



LEAX Group

Supplier Code of Conduct

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1 General Compliance

1.1 Applicability

LEAX Group Supplier Code of Conduct, hereinafter referred to as "SCoC", applies to legal persons or legal entities that provides products and/or services to or on behalf of LEAX Group or any of its subsidiaries and affiliates, hereinafter referred to as "The Supplier" and "LEAX" respectively.

2 Labour and Human rights

LEAX shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labour and social security laws and regulations.

2.1 Discrimination

The Supplier shall ensure no person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin is strictly prohibited.

2.2 Harassment

The Supplier shall ensure that every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

2.3 Forced and compulsory labour

The Supplier shall not use forced labour, including prison labour, indentured labour, bonded labour or other forms of forced labour.

2.4 Child labour

The Supplier shall not directly or indirectly employ children below the minimum age of 15, unless the exceptions recognised by the ILO 138 Minimum Age Convention (article 6, 7) apply.

2.5 Young workers

The Supplier shall ensure that legally young workers under 18 years of age do not work overtime or at night and are protected against conditions of work which are harmful for their health, safety, morals or development.

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2.6 Wages and benefits

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income.

The Supplier shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Wages and benefits shall be paid on time, regularly and in a transparent way.

The Supplier shall not withhold payments, apply penalties or make any deductions from wages, unless prescribed by law or fixed by collective agreement.

2.7 Working hours

The Supplier shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

2.8 Freedom of association and collective bargaining

The Supplier shall respect the basic right of employees to freedom of association and collective bargaining.

2.9 Data privacy and information security

The Supplier complies with all relevant data privacy and information security legislation and other related regulation when handling and/or processing personal data.

2.10 Human Rights Due Diligence

The Supplier must implement a risk-based due diligence process following international standards like the OECD Guidance and UN Guiding Principles.

This process should identify, assess, prevent, mitigate, and monitor human rights risks in both operations and business relationships.

If risks or violations are found, the Supplier must take corrective and preventive actions and track their effectiveness.

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3 Health and Safety

3.1 Health and safety hazard prevention

The Supplier shall ensure that there is a process in place to identify, evaluate and prioritise elimination of health and safety hazard risks. The Supplier shall provide an appropriate workplace environment with safe facilities that are adapted to the purpose of the work performed.

The Supplier shall ensure that employees have appropriate personal protective equipment, machine and safety equipment as well as instructions on proper use. These instructions shall be communicated to, and understood by, concerned employees.

3.2 Emergency preparedness

The Supplier shall identify the risks of accidents to mitigate, limit and/or prevent the damage. Emergency plans shall be developed and implemented for each situation. All employees shall have knowledge about risks in their own operations and how to act in different types of crisis situations that may occur.

The Supplier shall have fully operational firefighting equipment, fire exits, first aid material, emergency plans, alarm procedures and signs easily accessible in sufficient number throughout the facility.

The Supplier shall make sure that there are always employees trained in first aid, fire safety and crisis support present at the workplace and clearly visualised. Response to various kinds of crises situations shall be trained regularly.

3.3 Accidents and incidents

The Supplier shall have systems to report, investigate and act regarding all accidents, near-accidents and unsafe situations. Managers and employees shall have knowledge about accidents and near accidents, understand the importance of preventive work and corrective actions and practice it in their daily work.

3.4 Facilities

The Supplier shall provide clean and safe facilities, including dining areas, food storage, locker rooms and resting areas. Employees shall always have access to potable clean water and toilets.

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3.5 Workplace Ergonomics

The Supplier shall identify load ergonomic risks and evaluate employee exposure. Load ergonomic includes conditions that can affect muscles and joints in the human body such as working position, repetitive movements, physical load and lifting positions. Concerned employees should be involved when designing or redesigning workplaces.

4 Environment

4.1 Environmental permits and licenses

The Supplier shall obtain, maintain and comply with all required permits and licenses for its operations.

4.2 Environmental protection

The Supplier shall endeavour to avoid and reduce adverse environmental impacts from its operations. The Supplier shall act to safeguard biodiversity. The Supplier shall handle environmental violations and complaints systematically, comply with all reporting obligations and keep stakeholders informed.

4.3 Resource efficiency and climate

The Supplier shall promote energy efficiency, sustainable use of resources and circularity. To actively reduce its direct and indirect greenhouse gas emissions, the Supplier shall minimize negative climate impacts and is expected to establish related targets and plans. The Supplier is expected to minimize its use of fossil fuels. The Supplier shall also control and implement actions taken to reduce the use of energy, water, raw materials and packaging materials.

In addition, specific requirements may be agreed in commercial agreements.

4.4 Hazardous substances

The Supplier shall handle hazardous substances and chemicals responsibly, and where reasonably possible, substitute such substances for less hazardous ones.

4.5 Emission and waste handling

The Supplier shall control and implement actions taken to reduce emissions to air. The Supplier shall implement systematic waste handling management for wastewater, hazardous and non-hazardous waste. Oils, chemicals, batteries and other hazardous waste shall be kept separated from other waste and handled to avoid leakage into air, water or soil. Waste should be sorted to be re-used or recycled. Landfill deposits should always be avoided.

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4.6 Chemicals

The Supplier shall have implemented methods, procedures and equipment to introduce, handle, label and store chemicals in a safe way to minimise negative impact on people and the environment. The Supplier shall work actively to limit and restrict their number of chemical products and select chemicals with lowest possible health and environmental risk. The Supplier shall always perform risk assessments and take action to minimise any negative impact on people and the environment before introducing new chemicals. Employees working with risk chemicals shall always have updated and accessible instructions and special training regarding risk handling and emergency preparedness.

The Supplier shall always provide Safety Data Sheets for all chemical products used in, or in connection with, any article when there is a risk that LEAX staff can be exposed to those chemical products.

5 Ethics

5.1 Personal information

LEAX requires its suppliers to protect the personal data of employees, former employees, customers, suppliers, and other persons concerned. The Supplier shall only collect, process, use and store personal data where there is the consent of the person concerned, a contractual agreement or some other legal basis.

5.2 Bribery and corruption

LEAX supports national and international efforts to protect competition from the distorting effects of corruption and rejects all corrupt practices and forms of behaviour which could damage the company. LEAX expects its suppliers to reject and prevent all forms of corruption, including but not limited to what are known as facilitation payments, i.e. payments to speed up the performance of routine tasks by officials.

The Supplier must ensure that their employees, subcontractors and other representatives do not grant, offer or accept bribes, facilitation payments, inadmissible donations or other inadmissible payments or undue benefits to or from customers, officials or other business partners.

5.3 Competition and antitrust

LEAX requires The Supplier to comply with valid and applicable competition and antitrust laws. The Supplier will not conclude anti-competitive agreements with competitors, suppliers, customers or other third parties and will not abuse a dominant market position.

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5.4 Export Control/ Sanctions

LEAX suppliers shall comply with all applicable international trade and export control regulations and properly classify and obtain all applicable approvals, licenses and certificates prior to export or transfer of products, technology or software.

5.5 Conflict of interest

Personal interests or relationships shall not influence The Supplier in decision making, only objective and fact-based criteria are valid.

5.6 Gifts, hospitality and invitations

LEAX suppliers shall not offer LEAX employees or any other business partners any inappropriate benefits either directly or indirectly in the form of gifts, hospitality, or invitations to unduly influence them. Neither do they ask for, nor accept such benefits.

5.7 Money laundering

LEAX Suppliers shall only conduct business relationships with business partners of whose integrity they are convinced. They shall ensure that the applicable legal money laundering and terrorism financing provisions are not breached.

5.8 Responsible sourcing of minerals

The trade of minerals in some parts of the world, funds the deadliest conflicts and worst forms of human rights violations. The Supplier shall exercise due diligence consistent with the relevant parts of the OECD Due Diligence Guidance or equivalent processes along their mineral supply chains. This includes the implementation of policies and measures to identify risks and take appropriate action to ensure that the minerals used do not directly or indirectly through the extraction, transport, trade, handling or export of those minerals finance or benefit armed conflicts.

Information regarding smelters or refiners for minerals used by suppliers or subcontractors must be disclosed to LEAX upon request.

The Supplier shall also work to identify and manage sustainability and human rights risks related to other critical raw materials used in its products and operations, including but not limited to metals, energy-intensive materials and other high-risk inputs.

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6 Management

A considerate, structured, knowledgeable and engaged management which provides the organisation with effective management systems is the base of sustainable business. The values of this SCoC shall be integrated in the daily business. Management shall identify, assess, communicate and train the organisation in legal and other requirements to ensure compliance.

Sustainability, ethics and compliance with this SCoC shall be integrated into the Supplier's overall business strategy and governance structure.

The Supplier's top management is ultimately responsible for ensuring compliance with this SCoC and for providing adequate resources to implement and maintain effective management systems related to sustainability, human rights, health and safety, environment and business ethics.

6.1 Company statement

The Supplier shall develop a company statement, such as a Code of Conduct, with a commitment to the highest social, ethical and environmental standards. This company statement should be clearly displayed in languages locally understood by the employees in all company facilities.

6.2 Responsibility

The Supplier should have a sustainability representative, or similar, reporting to top management. The representative should develop and implement sustainability targets and actions within the company and ensure compliance with the SCoC.

The sustainability representative, or equivalent function, shall have a clear mandate and sufficient authority to report sustainability risks, performance and non-compliances directly to top management. Sustainability objectives, risks and progress shall be reviewed by top management on a regular basis.

6.3 Trainings

The Supplier shall develop, implement and uphold a training plan for employees. The training should be tailored to everyone, ensuring that each employee is equipped with the proper skills and knowledge related to their working tasks. The company's statement and policies shall be clearly communicated in detail to their employees.

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6.4 Supplier management

The Supplier are responsible for ensuring compliance with the SCoC in its supply chain. The Supplier shall conduct audits of their supply chain when requested by LEAX. Any non-compliance identified in the Supplier's supply chain should be assessed and remedied within a reasonable time frame and without any additional cost to LEAX. Failure to notify LEAX of such non-compliance shall constitute a breach of this SCoC.

The Supplier shall apply a risk-based approach to supplier management and due diligence within its supply chain. This includes identifying and prioritising suppliers and subcontractors based on sustainability, human rights, environmental and ethical risks.

The Supplier shall monitor compliance through appropriate measures such as self-assessments, audits or other evaluation activities. In case of identified non-compliance, the Supplier shall establish and implement corrective action plans within defined timeframes. Persistent or severe non-compliance may result in consequences, including termination of the business relationship.

6.5 Monitoring and Continuous Improvement

The Supplier shall establish processes to monitor, measure and evaluate compliance with this SCoC. Relevant performance indicators shall be used to track progress and identify areas for improvement. The Supplier shall work systematically with continuous improvement and take corrective actions where deficiencies are identified.

7 Report of Misconduct

It is important for LEAX to have an ethical corporate culture, and our policies support a culture where issues and misconduct are addressed, accountability is promoted, and trust is built. LEAX encourages external partners to report misconduct related to violations of this SCoC or the LEAX Code of Conduct, and if necessary, to use the [LEAX Whistleblowing channel](#) for third parties, which is a phone and web-based reporting tool managed by a third party. The goal should always be to contribute to improving our company in terms of conducting business in a correct and responsible manner.

The Supplier shall ensure that employees and other relevant stakeholders have access to effective and confidential grievance mechanisms and are protected against retaliation when reporting concerns or misconduct in good faith.

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8 Change history

Date	Change	Version
2021-09-01	First issue released	1.0
2024-06-10	Section 5.4 Export Control added	2.0
2024-12-13	Section 7 Report Misconduct added	3.0
2026-02-20	The whole policy has been revised	4.0