

## **HMK Bilcon**

### Supplier code of conduct



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## SUPPLIER CODE OF CONDUCT

HMK Bilcon is committed to conducting responsible and sustainable business practices. This Supplier Code of Conduct (CoC) outlines the minimum requirements for our suppliers regarding environmental, social, and ethical business practices (ESG). Suppliers must ensure that their employees, subcontractors, and business partners adhere to these standards. Compliance with this CoC is fundamental for doing business with HMK Bilcon.

### 1. Non-compliance and consequences

- 1.1. Suppliers must ensure their employees and subcontractors are familiar with this Code of Conduct and any applicable international standards and national legislation.
- 1.2. If a supplier does not expect to be able to comply with this Code of Conduct, HMK Bilcon must be informed in advance so that it is possible to initiate a dialogue on how and when the supplier will be able to comply with the principles.
- 1.3. In case of identified breaches of / non-conformities with this CoC and mentioned standards, the Supplier is obliged to inform HMK Bilcon and initiate relevant and appropriate actions to manage the non-conformities.
- 1.4. HMK Bilcon reserves the right to audit organizations when non-conformities are documented or suspected. Audits will be conducted in collaboration with the supplier.
- 1.5. This Code of Conduct is not intended to be a complete list of all requirements and standards, but a guide to ensure responsible business conduct.
- 1.6. HMK Bilcon expects the supplier to continuously strive to improve their performance in the areas of human rights, labour and workers' rights, environment and climate, business ethics, and anti-corruption.
- 1.7. If a supplier violates the requirements of this Code of Conduct, and other legal and/or internationally recognized frameworks relating to quality, sustainability, cybersecurity, product compliance, etc., and shows repeated negligence, or if a supplier refuses to improve performance related to identified issues, HMK Bilcon reserves the right to terminate the cooperation.

### 2. Environment and Climate

#### Commitment

- 2.1. HMK Bilcon works actively to minimize its environmental impact, including reducing greenhouse gas emissions, optimizing energy use, minimizing waste, and promoting environmentally friendly practices.
- 2.2. We are committed to reporting transparently on our climate impact and we are continuously improving data quality to ensure a databased foundation for mitigative actions.
- 2.3. We have an ambition to continuously improve our environmental efforts to reduce negative impacts using a structured PDCA-approach (as required by ISO14001).

### Expectations of suppliers

- 2.4. HMK Bilcon encourages our suppliers to actively work with and implement sustainable practices that reduce their environmental footprint, thereby minimizing CO2 emissions, reducing waste, promoting resource efficiency and circularity, and protecting nature and ecosystems.
- 2.5. Suppliers are expected to collaborate with HMK Bilcon in promoting sustainable procurement and reducing environmental impact throughout the supply chain.
- 2.6. Suppliers must support carbon reduction efforts by providing relevant emissions data upon request and exploring opportunities for joint sustainability initiatives.

## 3. Human rights, work environment, and workers' rights

### Commitment

- 3.1. In line with HMK Bilcons commitment to responsible business practices, HMK Bilcon is committed to respecting internationally recognized human rights standards and complying with national legislation, and we expect the same from our suppliers.
- 3.2. We have an ambition of actively advancing human rights throughout our value chain by promoting fair labour practices, safe working conditions, and respect for individual dignity.

### Expectations of suppliers

- 3.3. Suppliers must ensure working conditions comply with international labour standards, including the fundamental principles set by the ILO and the UN Guiding Principles on Business and Human Rights.
- 3.4. Suppliers must not engage in or benefit from human trafficking, modern slavery, forced labour, or child labour.
- 3.5. Suppliers must provide a safe and healthy workplace, minimize occupational hazards, and offer necessary protective equipment.
- 3.6. Suppliers must comply with employment regulations, eliminate discrimination, respect employees' freedom of movement, and allow them to form or join trade unions freely.

## 4. Business ethics and anti-corruption

### Commitment

- 4.1. HMK Bilcon is a trustworthy and transparent organization that acts with high integrity. At HMK Bilcon, we have high standards of business ethics and reject all forms of corruption, bribery, and abuse of power.
- 4.2. We have an ambition of continuously strengthening our ethical standards and promoting a culture of integrity, transparency, and zero tolerance for corruption throughout our operations and partnerships.

### Expectations of suppliers

- 4.3. Suppliers must implement effective procedures to prevent corruption, bribery, extortion, and unauthorized payments.
- 4.4. Any form of corruption or unethical business practices is strictly prohibited, and suppliers must promote transparency and accountability.
- 4.5. Suppliers are encouraged to develop internal policies to prevent corruption and unethical conduct.

## 5. Cybersecurity

### Commitment

- 5.1. HMK Bilcon acknowledges the risks relating to inadequate cybersecurity governance and has always worked proactively to ensure a high-performing data governance culture.
- 5.2. HMK Bilcon has obtained ISO 27001 certification and continues to strengthen cybersecurity measures to counter evolving threats.
- 5.3. We have an ambition of continuously enhancing our cybersecurity practices to stay ahead of emerging risks and maintain a secure and resilient digital environment.

### Expectations of suppliers

- 5.4. Suppliers must uphold strong IT security practices, comply with relevant regulations, and continuously improve security frameworks.
- 5.5. While ISO 27001 certification is encouraged, suppliers must at a minimum demonstrate a proactive approach to protecting sensitive data and ensuring IT resilience.
- 5.6. Suppliers must promptly report any cybersecurity breaches affecting HMK Bilcons data.

## 6. Whistleblower scheme

### Commitment

- 6.1. HMK Bilcon has a whistleblower scheme where employees can anonymously and securely report serious matters or suspicions of, for example, bribery, extortion, embezzlement, theft, accounting manipulation, sexual harassment, and other matters.
- 6.2. We have an ambition of fostering a culture of transparency and trust by continuously strengthening and promoting the use of our whistleblower scheme.

### Expectations of suppliers

- 6.3. Suppliers must be aware of and respect the whistleblower scheme of HMK Bilcon.
- 6.4. Suppliers, who are not required by law, are encouraged to implement similar mechanisms for their employees and subcontractors.

- 6.5. If suspected of corruption or unethical conduct, suppliers must cooperate fully with investigations and take corrective action.
- 6.6. Suppliers must ensure that whistleblower solutions are in place and accessible to all employees.

## 7. Product compliance and responsible sourcing

### Commitment

- 7.1. HMK Bilcon is committed to delivering high-quality products that comply with any specific product regulation in any of the markets we operate in. In addition, we have an ambition of continuously improving our practices to ensure responsible sourcing and full compliance with evolving product regulations across all markets.

### Expectations of suppliers

- 7.2. Suppliers must comply with all applicable product safety, environmental, and quality regulations, for instance REACH, RoHS, the EU Conflict Minerals Regulation, and other relevant product-specific regulations to ensure chemical safety and responsible sourcing as well as handling of waste.

## 8. Confirmation

By signing this Code of Conduct, the supplier confirms their commitment to comply with the stated requirements.

Dato: [Select date]

Dato: [Select date]

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Name of Supplier contact,  
Company

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Name of Supplier contact,  
Company