

Supplier and Business Partner Code of Conduct

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Made by	DTa
Checked by	BAc
Approved by	BoD and CEO

1. Purpose and scope

Cambi is committed to conducting business responsibly and in line with high ethical, social and environmental standards. This Supplier and Business Partner Code of Conduct sets out the **minimum requirements** that apply to all companies and individuals supplying goods or services to Cambi or acting on Cambi's behalf.

It applies globally to suppliers, subcontractors, distributors, agents, consultants and other business partners, collectively referred to as business partners.

Compliance with this Code is a condition for doing business with Cambi. Translations are available on request. It should be read alongside Cambi's Human Rights Policy, which outlines its broader commitments.

2. Compliance and integrity

Legal compliance and standards

Business partners must comply with all applicable laws and regulations wherever they operate. When national laws are weaker than recognised international standards, the higher standard applies.

Business partners must provide information and cooperate with Cambi to meet legal obligations under the **Norwegian Transparency Act** and the **UK Modern Slavery Act**.

Business integrity and fair competition

Business partners must conduct business with integrity and in fair competition. The following requirements apply.

- **Integrity:** Do not offer, give, request or accept bribes, facilitation payments, illegal payments or other improper advantages.
- **Gifts and hospitality:** Do not offer or accept anything of value that could improperly influence a business decision.
- **Conflicts of interest:** Disclose and manage actual or potential conflicts.
- **Fair competition:** Do not engage in price fixing, bid rigging, market sharing or other anti-competitive practices.
- **Anti-money laundering and tax integrity:** Ensure that financial transactions are lawful and transparent. Do not engage in money laundering, terrorist financing or deliberate tax evasion.
- **Sanctions and trade compliance:** Comply with export controls, customs requirements and international sanctions.
- **Accurate records:** Keep books and records that are complete, accurate and not misleading.
- **Contributions and sponsorships:** Do not make political contributions, charitable donations or sponsorships on Cambi's behalf without prior written approval.

Data protection, confidentiality and information security

Business partners must protect personal data, confidential information and intellectual property, and keep information systems secure.

- **Personal data:** Handle personal information in line with applicable laws, including the EU General Data Protection Regulation where relevant.

- **Confidentiality:** Protect Cambi's and customers' confidential information. Use it only for its intended purpose and prevent unauthorised disclosure.
- **Intellectual property:** Respect and safeguard intellectual property rights and licensed materials. Do not copy, share or use them without permission.
- **Information security:** Implement appropriate technical and organisational measures to prevent unauthorised access, loss or misuse of data and systems. Inform Cambi promptly of any breach of personal data or confidential information.

3. People and workplaces

Business partners must respect internationally recognised human rights and ensure safe, fair workplaces for all workers, including temporary, agency and migrant workers.

Human rights and labour

The following minimum requirements apply to the recruitment, employment and treatment of workers.

- **No forced labour:** Do not use forced, bonded, trafficked or prison labour. Do not charge recruitment fees. Do not require deposits or retention of identity documents. Allow workers to leave employment with reasonable notice.
- **No child labour:** Do not employ anyone under 15 years old or under the higher legal minimum. Do not assign hazardous or night work to anyone under 18.
- **Non-discrimination:** Make decisions on hiring, pay, training, promotion and termination without discrimination based on gender, age, ethnicity, religion, political opinion, disability, sexual orientation, trade union membership or any other protected characteristic. Prevent harassment and bullying.
- **Freedom of association and collective bargaining:** Respect workers' right to organise and to bargain collectively. Where the law restricts these rights, enable alternative forms of representation.
- **Fair wages and working conditions:** Meet at least legal and industry standards for wages, benefits and working hours. Ensure overtime is voluntary and paid at a premium. Provide written employment agreements. Where housing is provided, ensure it is safe, clean, and not used to exploit workers.
- **Humane treatment:** Treat workers with dignity and respect. Do not use physical or verbal abuse, threats or inhumane disciplinary measures.

Health, safety and well-being

The following requirements apply to health, safety and well-being in the workplace.

- **Risk management:** Identify, assess and control hazards to prevent accidents, injuries and occupational illness.
- **Training and equipment:** Provide job-specific training, instructions and supervision. Ensure safe plant and machinery. Provide and enforce the use of suitable personal protective equipment.
- **Emergency preparedness:** Maintain clear procedures and equipment for fire safety, first aid and other emergencies. Conduct regular drills.
- **Incident reporting and action:** Record, investigate and correct incidents and near-miss events without delay.

- **Contractors and visitors:** While in control of sites, operations or transport, protect employees, contractors, visitors and the public.

4. Environment and climate responsibility

Business partners must operate in an environmentally responsible manner and manage impacts across their activities, sites and supply chains, with particular attention to the most acute planetary pressures: climate change, biodiversity loss and nutrient pollution.

- **Compliance:** Follow all applicable environmental laws, regulations and permit conditions.
- **Climate impact:** Understand and reduce greenhouse gas emissions from operations and have a sustainability strategy, or a plan to develop one, with defined reduction targets and long-term ambitions towards net zero.
- **Water and marine resources:** Use water efficiently and prevent pollution of rivers, lakes and oceans by treating discharges responsibly.
- **Circularity and waste:** Use materials efficiently and prevent, reduce, reuse or recycle waste where possible, and manage hazardous waste safely.
- **Pollution prevention:** Minimise emissions to air, water and soil, ensure hazardous substances are disclosed, handled, stored, transported and disposed of responsibly, and avoid persistent pollutants and chemicals of concern where suitable alternatives exist.
- **Biodiversity and land use:** Avoid unlawful deforestation and ecosystem destruction and protect sensitive habitats and soils.

5. Product and supply chain responsibility

Business partners must ensure that products and services are safe and meet agreed requirements, and that supply chains are managed responsibly.

Product quality and safety

The following requirements apply to products and services delivered to Cambi.

- **Standards and specifications:** Meet applicable laws, regulations and industry standards and all agreed specifications and contract requirements.
- **Product safety:** Deliver only safe products and services and control risks to health, safety and the environment.
- **Traceability and recall:** Maintain traceability of materials, components and services and cooperate fully with corrective actions and recalls.
- **Change control:** Notify Cambi in advance of material changes to design, materials, process, manufacturing location or key sub-suppliers that could affect quality, safety, performance or compliance.
- **Documentation:** Provide clear instructions, required documentation, and labelling in the agreed language.

Supply chain responsibility

The following requirements apply to the management of your own supply chains.

- **Equivalent standards:** Apply standards equivalent to this Code in contracts with sub-suppliers in a way that is proportionate to risk.
- **Due diligence:** Identify, assess and address risks in your supply chains in line with recognised guidance for responsible business conduct.
- **Transparency:** Provide information on the origin of materials, components and services and on relevant sub-suppliers when requested.
- **High-risk materials:** Source minerals, metals, electronics and other high-risk commodities responsibly and avoid contributing to conflict, human rights abuse or severe environmental harm.
- **Cooperation:** Complete Cambi's due diligence questionnaires and provide supporting evidence when requested.

6. Monitoring and corrective actions

Business partners must cooperate with Cambi's due diligence.

- **Audits:** Allow Cambi, or independent third parties acting on Cambi's behalf, to conduct risk-based assessments or audits.
- **Access and information:** Provide relevant documents, records and reasonable access to sites and personnel on request, subject to confidentiality and applicable law.
- **Corrective actions:** Agree and implement corrective action plans within agreed timelines. If agreement cannot be reached, Cambi may escalate in line with Chapter 8.
- **Costs:** Cover your own costs of complying with this Code and implementing corrective actions.
- **Verification:** Provide evidence that corrective actions have been completed when requested.

7. Reporting concerns

Business partners must ensure concerns can be raised safely and addressed without retaliation.

- **Access to channels:** Provide safe and confidential ways for workers and stakeholders to raise concerns related to this Code.
- **Non-retaliation:** Do not retaliate against anyone who raises a concern in good faith.
- **Escalation to Cambi:** Report concerns that relate to Cambi, or that cannot be resolved within your own processes, through Cambi's reporting channels.
- **Cooperation:** Cooperate with Cambi in investigating and resolving reported concerns.

8. Consequences and governance

Consequences of non-compliance

Cambi prefers remediation over termination, but serious or unresolved breaches may affect the business relationship.

- **Suspension:** Cambi may suspend cooperation or new orders if the requirements of this Code are not met.

- **Termination:** Cambi may terminate the business relationship in cases of serious or repeated breaches.
- **Other remedies:** Cambi may exercise any additional rights available under law or contract.

Code governance

Cambi reviews this Code at least annually and assigns executive responsibility for maintaining the Code to ensure its effectiveness and alignment with recognised standards. The company will notify business partners of material changes, and continued cooperation requires respect for updated requirements. Acceptance of this Code is a condition for doing business with Cambi.

Acknowledgement

We hereby confirm that we have received, understood and accepted Cambi's Supplier and Business Partner Code of Conduct.

Company name:

Address:

Name:

Title:

Date:

Signature:

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