

# Group Responsible Sourcing Policy

## Introduction and contents

This policy contains Systemair's Responsible Sourcing policy and sets the requirements and guidelines for how Systemair manages its suppliers in a responsible way. The policy has been developed to strengthen Systemair's efforts in performing necessary checking and verification of suppliers, specifically concerning human and labour rights due diligence. Failure to comply with the policy can have serious consequences for Systemair. Systemair is a member and supports the UN Global Compact's 10 Principles on human rights, labour, environment and anti-corruption.

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The English version of this policy shall prevail should there be any discrepancies between other translated versions.

## Scope of policy

This policy applies to all Systemair group companies and for all Systemair's employees.

## General principles and requirements

Managing procurement and suppliers in a responsible way is a key priority for Systemair. The following sections describe how Systemair ensures responsible sourcing by managing supplier risks. In addition to the specific parts described in this policy Systemair's overall code of conduct contains the following non-negotiable codes:

- Systemair's suppliers shall be evaluated and selected based on their ability to deliver on sound commercial terms and their ability to live up to Systemair's supplier code of conduct (RBA).
- Systemair does not accept child labour in our business activities, nor do we accept products from suppliers who exploit child labour through their subcontractors (Principle 5 of the UN Global Compact).
- Systemair does not accept any form of forced and compulsory labour in our business activities or in our supply chain (Principle 4 of the UN Global Compact).
- Our new, largest and high-risk suppliers must confirm that they follow our supplier code of conduct, based on the Responsible Business Alliance (RBA) code of conduct. The RBA code establishes standards to ensure that working conditions in the supply chain are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

## Responsible sourcing and due diligence

Systemair has a broad supplier base and takes responsibility to minimise risks related to violating human and labour rights. The risk assessment is based on suppliers' location and size of annual spend. The output of the assessments provides input on how to prioritize due diligence activities on suppliers.

If the outcome of the due diligence activities show reason for concern necessary and appropriate actions are taken as soon as possible for mitigation. Monitoring and follow-up are planned accordingly. If the outcome shows severe faults, necessary actions are taken to either support the supplier to improve or to end the relationship.

In addition to be accepted as a supplier in the supply base of the Systemair Group each supplier needs to live up to complete the full self-information. This contains the most important supplier data and that they confirm to comply to several regulations, certification and standards within this sheet. This includes for example the RoHS directive and the REACH regulation.

## Supplier code of conduct (RBA)

The supplier code of conduct, that Systemair uses is the Responsible Business Alliance (RBA) Code of Conduct. The RBA has developed this code over several years and it contains all relevant standards and international guidelines, ensuring that the supplier has a responsible

business conduct and supply chain. Overall, this is a set of environmental, social and ethical industry standards.

When approving the supplier code of conduct in our supplier self-information they confirm that they adhere to the following points:

### Labour

Commitment to uphold the human rights of their workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

It specifically includes: Freely Chosen Employment, Young Workers, Working Hours, Wages and Benefits, Non-Discrimination/Non-Harassment/ Humane Treatment, Freedom of Association and Collective Bargaining.

### Ethics

Upholding the highest standards of ethics including business integrity and protection of identity and non-retaliation to name a few.

It specifically includes: Business Integrity, No Improper Advantage, Disclosure of Information, Intellectual Property, Fair Business, Advertising and Competition, Protection of Identity and Non-Retaliation, *Responsible Sourcing of Minerals*, Privacy.

The *responsible sourcing of minerals* includes that the supplier shall adopt a policy and exercise due diligence on the source and chain of custody of minerals in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

### Environment

Minimizing environmental impact and minimize adverse effects on the community, environment, and natural resources within their manufacturing operations, while safeguarding the health and safety of the public.

It specifically includes: Environmental Permits and Reporting, Pollution Prevention and Resource Reduction, Hazardous Substances, Solid Waste, Air Emissions, Materials Restrictions, Water Management, Energy Consumption and Greenhouse Gas Emissions.

### Health and safety

The incidences of work-related injury and illnesses should be minimized. A safe and healthy work environment must be guaranteed. Participants also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

It specifically includes: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing, Health and Safety Communication.

*For a more detailed look on the RBA Code of Conduct it is available via the following link:*  
[https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0\\_English.pdf](https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf)

## Roles and responsibilities

This policy is approved by the VP Global Supply Chain, member of Group Management. It is revised at least once per year to ensure an up-to-date policy in line with internal and external stakeholders' requirements and expectations. Group Purchasing is responsible for developing, implementing and revising the policy.

All employees have a personal responsibility to adhere to this policy. Local Management has extra responsibility to promote this policy and create necessary conditions to follow and monitor compliance.

## Communication and education

This policy is available on Systemair's Global Management System and should be read by all who have access to it. If any uncertainties arise after reading, this should be brought up with the individuals immediate manager.

Local Systemair companies must carry out regular trainings for relevant employees on the contents of this policy to improve awareness and knowledge on the topics.

## Reporting irregularities

Systemair gathers information in three ways: Annual reporting, other internal communication and if necessary, a whistleblower function. Communication is based on one of our core values Trust and the importance of employees reporting and escalating possible irregularities when made aware.

Through Systemair's whistleblower function employees and partners can provide information while being guaranteed total anonymity. All reports are received and investigated by an external company. Cases can be reported via Systemair's website or Intranet. Cases are reported to Systemair's whistleblowing committee.