

SUPPLIER CODE OF CONDUCT

PANKAS GROUP



Introduction and purpose

The Pankas Group is committed to responsible and sustainable business practices throughout the value chain. This means that we are dedicated to upholding ethical conduct, respect fundamental human rights, ensure the health and safety of all individuals, and minimize environmental impacts across our value chain.

With this Supplier Code of Conduct we intend to live up to internationally recognized instruments relevant to value chain workers, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

This Supplier Code of Conduct sets out our requirements for suppliers, subcontractors and business partners in relation to human rights, labour rights, environmental responsibility and business ethics.

Scope and application of the policy

This policy applies to all suppliers, subcontractors and business partners (suppliers) who provide goods or services to the Pankas Group.

General requirements

Pankas Group recognizes the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and OECD Guidelines for Multinational Enterprises. These international standards form the basis of this Pankas Supplier Code of Conduct, and we expect our suppliers to share our commitment to these standards.

All suppliers of services and materials must as a minimum comply with local laws and regulations in their countries of operation. Should any of the specific provisions of this Supplier Code of Conduct legally conflict with national or local laws, the applicable laws should always prevail; if such a conflict arises, the Pankas Group should be notified immediately.

Pankas Group expects all suppliers to comply with the EU Data Protection Regulation as well as local Data Protection Laws. Any supplier or partner who is processing personally identifiable data on behalf of any Pankas Group entity can be required to sign and commit to a Data Processing Agreement, outlining the rules and requirements regarding privacy and processing of personally identifiable data.

All suppliers must act in compliance with national and international competition legislation and regulation and must follow the WTO's legal ground-rules for international commerce to obtain open, fair and undistorted competition.

Human rights and labour rights

All suppliers to the Pankas Group must provide a safe and healthy working environment for all employees. This includes the implementation of safety procedures, providing appropriate protective equipment and training aimed at preventing workplace accidents and injuries.

Our suppliers are expected to make every effort to ensure a workplace free from discrimination and harassment, where all individuals are treated with dignity and respect, regardless of race, gender, religion, age, nationality, disability, sexual orientation, or political beliefs.

Employees must have freedom of association and the right to collective bargaining consistent with applicable laws. Employees must be treated within the applicable national or local laws regarding employment.

Working hours should be mutually agreed upon between the company and the employees. Our suppliers must compensate workers fairly, in accordance with local wage laws, and ensure compliance with legal working hours.

Our suppliers must adhere to the minimum employment age as defined by national laws or the ILO standards, whichever is stricter.

Pankas Group will not conduct business with suppliers who use forced, bonded or involuntary labour.

We expect our suppliers to respect employees' right to privacy when gathering or keeping personal information or implementing employee-monitoring practices.

Environmental responsibility

The Pankas Group urges its suppliers to work systematically to improve environmental conditions and reduce resource consumption minimizing negative impacts on the environment.

We expect suppliers to actively limit their use of resources. This includes minimizing the use of raw materials, energy and water, handling waste in an environmentally responsible way and recycling materials as much as possible.

Business ethics

Suppliers are expected to conduct business with integrity, fairness, and transparency, and to comply with all applicable laws and regulations.

Bribery and Corruption

Suppliers must not, directly or indirectly, engage in any form of bribery or corruption. Offering, giving, soliciting, or receiving anything of value to improperly influence a business decision is strictly prohibited.

Gifts and Hospitality

Suppliers must not, directly or indirectly, attempt to influence Pankas Group employees by offering costly gifts, excessive hospitality, travel, or other improper advantages.

Normal and modest gestures – such as customary business meals or symbolic tokens of appreciation – may be acceptable if they are reasonable, proportionate, and compliant with local law and Pankas Group guidelines.

Conflicts of Interest

Suppliers must avoid situations where personal or financial interests could conflict with their professional responsibilities. Any potential conflict must be disclosed immediately to Pankas Group.

Fair Competition

Suppliers are required to compete fairly and comply with all applicable competition and antitrust laws. Anti-competitive practices, such as price-fixing, bid-rigging, or market-sharing, will not be tolerated.

Anti-Money Laundering

Suppliers must comply with all applicable anti-money laundering laws and ensure that their operations are not used to facilitate criminal activity.

Implementation and monitoring

The Pankas Group recommends its suppliers to provide the requisite documentation for compliance with the Pankas Supplier Code of Conduct. We reserve the right to monitor suppliers and their facilities to ensure compliance with Pankas Supplier Code of Conduct.

The Pankas Group can request adequate action plans to correct monitoring findings and undertake follow-up visits to ensure that improvements are made. If improvements do not progress in an acceptable manner the Pankas Group reserves the rights to terminate the relationship.

Communication

The supplier is not permitted to include any company within the Pankas Group in the supplier's list of references or otherwise use the cooperation with Pankas as reference without the prior written consent from Pankas in each specific case.

By default, the use of the Pankas name is discouraged in supplier and/or affiliated companies' web pages, printed and electronic marketing materials, company presentations or any other communication, marketing, advertising or material similar in nature. The only exception will be social media including LinkedIn, Facebook etc. where information about certain achievements and the celebration of milestones with a Pankas Group entity will be allowed. In these instances, any and all content of such a post must be approved by Pankas Group prior to posting.

Whistleblower program

Pankas promotes ethical behavior in all business relationships. Our whistleblower program allows supplier representatives and other individuals not directly employed by Pankas to report illegal or unethical practices and violations of this Supplier Code of Conduct.

Concerns can be reported at www.pankas.com. All reports made in good faith will be investigated. Pankas ensures anonymity and confidentiality for everyone involved in the investigation, and guarantees protection against retaliation.

Audit and update

This Supplier Code of Conduct is reviewed at least every three years or as needed to ensure ongoing relevance and regulatory compliance.



Contact information

For questions or further guidance, you may contact your usual Pankas contact person or the Group ESG Manager.

I hereby accept with signature below, the above-mentioned terms:

On behalf of supplier

On behalf of PANKAS

Accepted by (name)

Accepted by (name)

Company name

Company name

Date

Date

Signature

Signature