

SUPPLIER CODE OF CONDUCT

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“Atea believes that information technology, combined with knowledge and creativity, can transform productivity and living standards across society. To fully realize our mission, it’s not enough for Atea to offer world-class IT solutions. We must ensure the long term sustainability of our business.” Steinar Sønsteby, CEO

Atea is committed to sourcing from suppliers who share its business ethics and principles, and apply them throughout their supply chain. Atea’s Code of Conduct, based inter alia on the UN Global Compact, states that “Atea’s suppliers shall deliver goods and services to Atea that are produced in accordance with the Responsible Business Alliance (formerly the Electronic Industry Citizenship Coalition) Guidelines.”

This Supplier Code of Conduct intends to set concrete expectations of Atea’s core-business suppliers and in turn of their contractors, sub-suppliers and other business associates at any level in the supply chain.

Supplier Code of Conduct

This Code is not meant to be exhaustive and there may be situations where it does not provide explicit guidance. We expect all suppliers to always comply with applicable laws and regulations and to exercise good judgement consistent with the business ethics promoted in this document.

Atea expects all its suppliers to progressively commit to implement the RBA Code of Conduct (hereafter “RBA Code”) – or an equivalent

code¹. The RBA Code establishes standards to ensure that working conditions in the electronics supply chain are safe, that workers are treated with respect and dignity and that business operations are environmentally responsible and conducted ethically. The RBA Code is intended to be a whole of supply chain initiative and involves, but is not limited to:

- Monitoring suppliers to uncover risks of and remediate non-compliance against the RBA Code
- Work proactively to ensure that the RBA Code is followed by their own contractors, sub-suppliers and other business associates at any level in the supply chain.
- Ensuring that management, monitoring and tracking processes are in place to ensure continuous performance improvement throughout their supply chain, not least through capacity building initiatives and continuous dialogue with suppliers.
- Implementing a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

Atea will also seek and favor suppliers who:

- a. Work to raise workers living standards, for

example through improved wage systems, benefits, welfare programs, reduction of working hours and any other activities that exceed legal requirements.

- b. Work to ensure and demonstrate that the RBA standards are applied to all workers, whether permanent, temporary, migrant, student, contract, direct or indirect employees.
- c. Demonstrate how they and their suppliers exercise due diligence on the supply of minerals whose sourcing could be linked to human rights violations and to direct or indirect support to armed conflict minerals, in line with the OECD guidelines or other equivalent guidelines².
- d. Use the RBA Code and sustainability criteria to drive business relationships with their suppliers.

Compliance and Collaboration

Atea expects its suppliers to commit to and actively pursue conformance with the RBA Code – or equivalent.

Atea expects its suppliers to share timely information and underlying documentation that will facilitate Atea’s monitoring of such commitment.

This includes all relevant information relating significant risks of non-conformance with the specific provisions set forth in the RBA Code, by either the suppliers or its sub-suppliers.

Atea will monitor how suppliers and sub-suppliers at any level within the supply chain live up to the expectations set out in this document. Atea will conduct systematic risk-based supply chain monitoring by various means. This will include but not be limited to self-assessments, information sharing agreements with priority suppliers, participation in industry audits, site visits and specific collaboration initiatives with suppliers and sub-suppliers, aimed at addressing priority issues.

For full details of the RBA Code:

responsiblebusiness.org/standards/code-of-conduct

CONTACT US: we believe there are many locally knowledgeable organisations that can help us understand the risks and dynamics in our supply chain. If you would like to share information with us about our supply chain, please contact us at responsiblesourcing@atea.se. The information provided will be treated confidentially.

¹ All references to the RBA Code hereafter are to be intended as referring to the RBA Code or an equivalent code of suppliers' choice. Evidence of equivalency needs to be provided to Atea.

² See also OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

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