# Harlequin Trade AB - Supplier Code of Conduct

Ethical and sustainability requirements for suppliers and business partners

**Purpose and scope**

Harlequin Trade AB ("Harlequin") expects its suppliers, business partners and relevant subcontractors ("the Suppliers") to conduct their operations in a responsible and sustainable manner. Suppliers shall respect internationally recognized human rights, workers' rights, applicable environmental requirements and principles of responsible business conduct.

The requirements in this Code of Conduct apply to activities connected to products and services supplied to Harlequin. Suppliers shall ensure that relevant employees, representatives and subcontractors are informed of and comply with these requirements.

Suppliers shall, where relevant, communicate equivalent requirements to their own suppliers and subcontractors involved in the supply chain for products or services supplied to Harlequin.

## 1. Laws and regulations

Suppliers shall comply with all applicable national and international laws, regulations and legally binding requirements relevant to their operations. Where national legislation and internationally recognized principles differ, Suppliers are expected to seek to apply the higher level of protection, insofar as this does not result in a violation of applicable law.

- Applicable trade restrictions, export and import requirements.
- Applicable competition law and rules on fair business practices.
- Applicable laws and regulations concerning corruption, fraud and money laundering.
- Applicable environmental and chemical legislation concerning hazardous materials, emissions, waste and wastewater, including the handling, transport, storage and disposal of such substances.

## 2. Human rights and workers' rights

Suppliers shall respect internationally recognized human rights and the dignity, health and safety of all workers.

### Child labour

Child labour is prohibited. Suppliers shall comply with applicable minimum-age legislation and shall not employ persons below the applicable legal minimum age or the age of completion of compulsory schooling, whichever provides the greater protection. Additional requirements are set out in Harlequin's UNCRC addendum.

### Forced labour and human trafficking

Forced, bonded, indentured, trafficked or otherwise involuntary labour is prohibited. Workers shall not be required to surrender passports or other identity documents as a condition of employment. Workers shall be free to terminate their employment in accordance with applicable law and contractual terms.

### Non-discrimination and respectful treatment

Suppliers shall not discriminate on grounds such as race, ethnic or social origin, nationality, religion or belief, age, gender, disability, sexual orientation, marital status or other status protected by applicable law. Harassment, abuse and other degrading treatment are prohibited.

### Occupational health and safety

Suppliers shall provide a safe and healthy working environment and comply with applicable occupational health and safety requirements. Relevant risks shall be identified and reasonable preventive measures shall be implemented.

### Fair pay and employment terms

Suppliers shall provide wages, benefits and employment conditions that at minimum comply with applicable legislation and binding collective agreements. Working hours, overtime and rest periods shall comply with applicable law. Overtime shall be compensated in accordance with legal requirements and shall, where required by law, be voluntary.

Suppliers are encouraged to work towards wages and employment conditions that support a reasonable standard of living for workers and their families.

### Freedom of association and collective representation

Suppliers shall respect workers' rights to freedom of association and to lawful forms of worker representation and collective dialogue, in accordance with applicable law and internationally recognized labour principles. Where independent trade unions or collective bargaining structures are legally available, workers shall be free to participate in them. Workers shall not be discriminated against, intimidated or subjected to retaliation for exercising lawful rights of association, representation or collective dialogue.

## 3. Environment

Suppliers shall comply with applicable environmental legislation and shall take a responsible and preventive approach to environmental impacts.

- Work to prevent pollution and reduce unnecessary consumption of energy and natural resources.
- Manage waste, emissions, wastewater and hazardous substances responsibly.
- Comply with applicable chemical and product-related requirements and provide Harlequin, upon request, with relevant environmental, material and chemical documentation.
- Inform Harlequin of significant changes in materials, production processes or manufacturing locations that may affect product compliance, environmental performance or sustainability risks.

## 4. Business ethics

Suppliers shall conduct business honestly, responsibly and in accordance with applicable agreements and legal requirements.

### Anti-corruption and bribery

Suppliers shall not directly or indirectly offer, promise, give, request or accept bribes, kickbacks or other improper advantages intended to influence business or public decisions. Suppliers shall take reasonable measures to prevent corruption, fraud and money laundering in their operations.

### Conflicts of interest

Suppliers shall avoid actual or apparent conflicts of interest and shall disclose circumstances that could improperly influence business decisions involving Harlequin.

### Protection of assets and information

Suppliers shall protect Harlequin's and its customers' tangible and intangible assets and respect intellectual property, confidential information and applicable data-protection requirements.

## 5. Supply chain transparency and onward communication

Suppliers shall, upon request from Harlequin, provide information reasonably necessary to enable Harlequin to assess sustainability risks and map the relevant supply chain. Such information may include the legal name, physical address and country of relevant manufacturing facilities, subcontractors and, where relevant and reasonably available, material suppliers and other upstream suppliers.

Suppliers shall inform Harlequin if significant parts of the relevant supply chain change and shall communicate equivalent sustainability requirements to relevant subcontractors involved in products or services supplied to Harlequin.

## 6. Compliance, follow-up and corrective actions

Suppliers are responsible for monitoring their compliance with this Code of Conduct. Harlequin may perform risk-based follow-up through, for example, dialogue, questionnaires, document reviews, supplier assessments, factory visits or review of relevant third-party audits.

If a non-compliance is identified, the Supplier shall cooperate with Harlequin and, where appropriate, prepare and implement a time-bound corrective action plan. Harlequin will normally seek improvement and remediation of identified non-compliance. In cases of serious violations, repeated non-compliance or failure to implement agreed corrective actions, Harlequin reserves the right to suspend purchases, require additional control measures or terminate the business relationship.

## Supplier acknowledgement

We confirm that we have received, read and understood this document and undertake to comply with its requirements in activities connected to products and services supplied to Harlequin Trade AB. We undertake to communicate relevant requirements to employees, representatives and subcontractors involved in such activities and to cooperate with Harlequin Trade AB regarding reasonable requests for information, follow-up and corrective actions.

**Company:** _____

**Name and position:** _____

**Place and date:** _____

**Signature:** _____