

## SUPPLIER CODE OF CONDUCT POLICY

### 1 Introduction

Retta's values are: "we operate responsibly, together we succeed and we make brave reforms".

Complying with all applicable legislation and generally acknowledged ethical principals is crucial. Retta group has Code of Conduct Policy for employees and managers of all Retta Group companies ("Retta") and for Boards of Directors of all Retta companies.

For more information, see our Code of Conduct Policy.

Code of Conduct Policy is supplemented by this Supplier Code of Conduct Policy.

The Supplier Code of Conduct applies to all suppliers that deliver goods and/or services to Retta and their respective employees and agents (hereinafter individually and collectively referred to as "Supplier"). For the purpose of this Supplier Code of Conduct, contractors and consultants are also referred to as Suppliers.

If you have any questions about the content of this Supplier Code of Conduct, please reach out to Retta's Chief Compliance Officer, Local Compliance Officer or Specialist Sourcing, working environments.

### 2 Implementation and compliance with the Supplier Code of Conduct

Suppliers are expected to adhere to this Supplier Code of Conduct. Retta monitors compliance as described below in Section "*Monitoring and Enforcement*". Suppliers must ensure that relevant employees and other workforce are aware about the content of the Supplier Code of Conduct and are recommended and encouraged to implement equivalent requirements on their own suppliers.

The Supplier Code of Conduct contains "Requirements" that Suppliers are expected to comply with and "Recommendations" that Suppliers are encouraged to comply with or implement. Additional Supplier specific requirements related to the areas in this Supplier Code of Conduct may be defined in commercial agreements with specific Suppliers.

### 3 Legal compliance

Suppliers must stay up to date, and comply with, national and regional legislation as well as relevant and applicable international regulations and conventions related to all the areas in the Supplier Code of Conduct.

Where the requirements in the Supplier Code of Conduct are stricter than local laws, the requirements of the Supplier Code of Conduct must be applied. In the event of actual or potential contradictions between the Supplier Code of Conduct and applicable laws and regulations, Suppliers must notify Retta.

### 4 Human rights

#### *Requirements*

- Support and respect the protection of internationally proclaimed human rights.
- Be aware of and address any actual or potential negative human rights impacts that they cause or contribute to, or that is directly linked to their operations, products or services.

- Recognize and mitigate any real or potential negative human rights impacts arising from their operations, products, or services, or directly associated with them.
- No allowance or tolerance for any form of modern slavery, including forced labour, in own operations or through value chain.
- Prevent all forms of child labour and respect children’s right to personal development and education. The minimum working age is 15 years or the legally prescribed minimum work age, if higher.

## 5 Labour standards

### *Requirements*

- Ensure that all employees and individuals working under the control of Supplier are offered a safe and healthy workplace.
- Commit to zero fatalities at the workplace as well as high-consequence work-related injuries or ill health amongst employees.
- Ensure that a regular working week complies with relevant international labour standards.
- Pay wages and benefits at a minimum according to applicable laws, industry standards and relevant collective agreements, whichever is higher. Wages must be enough for employees to meet basic needs and to provide for some discretionary income (so called “living wage”).
- No tolerance for discrimination at the workplace against anyone (employee or business relation representative) based on age, race, gender, religion, ethnicity, sexual orientation or disability or other relevant characteristics.
- Respect employees’ freedom of association and employees’ rights to collectively bargain with Supplier.
- Treat employees equally, according to their abilities and qualifications.

### *Recommendations*

- Take active measures for employee wellbeing.
- Provide health insurance and extended income security and social benefits, even in jurisdictions where Suppliers are not required to do so.
- Where needed, seek to facilitate other forms of worker representation than collective bargaining.
- Promote diversity by striving to reflect the societies where Suppliers operate and promote various aspects of diversity including gender, age, ethnicity, skills, experiences, culture, and personality or other relevant characteristics.
- Contribute to the positive social and economic development of the communities where Suppliers minimise any negative social impacts of its operations on those communities.

## 6 Business ethics

### *Requirements*

- Prohibit all forms of corruption and bribery including extortion and facilitation payments.
- Ensure that employees of Supplier avoid all conflicts of interest that may impact – or appear to impact – Retta.
- Business decisions relating to Retta must remain independent from any consideration that does not involve the business at hand and cannot be influenced by private interests.
- Implement measures to prevent the risk of becoming involved in unethical, illegal or criminal activities such as money-laundering or terrorist financing or engagement with business partners that are the target of economic sanctions or export control laws.
- Comply with relevant export controls and sanctions laws and regulations, including United Nations sanctions and applicable sanctions under the laws of the European Union, the United States and the United Kingdom.
- Comply with the principles of free enterprise and fair competition, including ensuring that no employees engage in discussions or agreements with competitors regarding price fixing, market sharing, bid rigging, or similar.
- Protect Retta’s personal data from any improper disclosure, theft or misuse at all times and respect the right to information and privacy of end users.
- Comply with all applicable employer obligations
- Pay the right amount of tax, in the right place, at the right time.

### *Recommendations*

- Implement a Code of Conduct or Code of Ethics.
- Provide employee training on areas covered by this Supplier Code of Conduct.

## 7 Environment and climate change

### *Requirements*

- Identify actual and potential environmental and climate impacts from their operations, including but not limited to products and services, and continuously strive to prevent and minimize negative impact.
- Continuously develop their environmental impact reporting and produce relevant reporting upon request. Commit to Retta’s environmental policies and standards when providing goods and services for Retta.
- The supplier adheres to environmental regulations and standards related to its operations and emphasizes environmentally responsible practices in all its locations.
- Maintain a transparent and traceable supply chain.

**Recommendations**

- Obtain a recognized sustainability certifications, such as ISO 14001 (Environmental Management System) or other relevant certifications based on industry standards.
- Wherever possible promote and contribute to: climate change adaptation; the sustainable use and protection of water and marine resources; the transition to a circular economy; pollution prevention and control; and the protection and restoration of biodiversity and ecosystems.
- To work continuously and systematically towards better environmental performance by setting targets, measuring, and reporting on progress Reporting concerns on all areas of materiality in all areas of operation
- Support the Paris Agreement commitment to mitigate climate change by keeping the global temperature rise below 1.5 degrees and implement measures supported by science-based targets to reduce greenhouse gas emissions in operations and reach net zero by 2050.

We recommend all our Suppliers to maintain a secure whistleblowing/reporting system and we require all our Suppliers who have legal obligation to maintain a whistleblowing channel, to have such in place. Suppliers may not tolerate any forms of retaliation against anyone who in good faith submits a report of an alleged violation. We encourage our Suppliers to ensure their employees have the right to raise concerns about potential breaches of this Supplier Code without the fear of reprisals through the Supplier ordinary whistleblowing/reporting channel.

We also note about our own Whistleblowing channel. For more information, see our Whistleblowing Policy.

**8 Monitoring and enforcement**

If a Supplier becomes aware of any violations of this Supplier Code of Conduct it is expected to inform Retta without undue delay. Following a violation, Supplier will be given the opportunity to remedy any such violations. If Supplier does not inform Retta about the violation or does not remedy an acknowledged violation, Retta has the right to take legal actions including the right to terminate the commercial agreement between Retta and Supplier.

Retta must have the right to and may verify Supplier’s compliance with the requirements in this Supplier Code of Conduct by means of dialogue, self-assessment questionnaire or on-site audits. Retta must also have the right to conduct interviews with Supplier’s employees and gain access to relevant, accurate and complete documentation and records related to this Supplier Code of Conduct. Audits may be carried out by Retta or an independent third party appointed by Retta. Retta acknowledges that its audit rights including access to documentation and records may be restricted due to Supplier’s legal or contractual obligations.

Effective date	Version	Change description
20 December 2023	v 1	original