



Supplier code of conduct

Introduction

Svenska Retursystem (SRS) has been an essential link between producers, wholesalers, and stores in the Swedish grocery industry since 2001. Our pooling system is based on the principles for circular economy and sustainable growth is the heart of our daily business and operations. Within the company we all share the vision of a sustainable future. This Supplier Code of Conduct (SCoC) outlines the standards and expectations for ethical, responsible, and sustainable behavior required from all SRS Suppliers.

Compliance with applicable laws.

In addition to the requirements set out in this SCoC the Supplier shall comply with all applicable laws and regulations of the country in which the company has its registered office as well as of countries in which it operates. The Supplier shall always comply with the strictest requirements whether they are relevant applicable laws or SCoC specific requirements. In cases where this SCoC conflicts with national laws, Suppliers must adhere to the law and promptly inform SRS of the conflict.

The SCoC is based on the Ten Principles of the UN Global Compact and related international declarations. SRS expects Suppliers to ensure their own partners and subcontractors align with these requirements.

Social Sustainability

SRS follows the UN Guiding Principles on Business and Human Rights and expects Suppliers to respect these in all business practices.

Occupational Health and Safety (OHS): Suppliers must provide a safe, healthy work environment and comply with OHS laws where they operate. They should:

- Meet legal OHS standards, maintain a written policy, demonstrate management's commitment, and assign OHS roles.
- Implement and communicate safety procedures to employees.
- Have emergency preparedness plans and promote health and safety awareness.

- Foster a strong safety culture through open communication and proper training.
- Regularly assess OHS performance, report incidents, and continuously strive for improvement, including preventing substance-related issues.
- Ensure that all products delivered by the Supplier meet the quality and safety requirements set out in applicable laws.

Freedom of Association: Suppliers must respect employees' rights to join unions and engage in collective bargaining without intimidation, as permitted by national laws.

Child Labor: Suppliers must not engage in or benefit from child labor. They must only hire workers who meet the legal minimum age or are at least fifteen (15) years old, whichever is stricter, and comply with related laws.

Equal Rights: Suppliers must avoid discrimination in hiring and employment based on, including but not limited to, race, age, gender, religion, marital status, sexual orientation, ethnicity, disability, pregnancy, or political beliefs.

Hours of Work and Wages: Suppliers must pay at least the legal minimum wage and provide all legally required benefits. Working hours, compensation, and leave must comply with local laws and industry standards.

Forced Labor: Suppliers must not engage in any form of forced or involuntary labor.

Economic Sustainability

SRS expects its Suppliers to conduct business in an ethical and lawful manner.

Anti-Corruption: Suppliers must adhere to a zero-tolerance policy for bribery. They should not accept or offer any form of bribes or incentives to influence business decisions. This includes:



- SRS representatives shall always pay for their own travel and accommodation costs when visiting the Suppliers, conferences, reference plants etc.
- SRS representatives shall not be offered any gifts, hospitality or expenses that could be considered unreasonable or inappropriate with regard to possible business transactions.

Anti-Money Laundering and Trade Sanctions:

Suppliers must not engage in money laundering or support any criminal activities. Compliance with anti-money laundering and trade sanctions laws is mandatory.

Responsible Sourcing: Suppliers must source materials ethically, ensuring that products like tin, tantalum, tungsten, and gold do not finance conflicts or contribute to human rights abuses.

Fair Competition: Suppliers shall conduct their business in line with fair competition and in accordance with all applicable competition and



anti-trust laws. They shall not enter into discussions or agreements with competitors concerning pricing, market sharing or other similar activities.

Conflict of Interest: Suppliers shall avoid conflicts of interest that may compromise the Suppliers' credibility in SRS or other exterior parties' confidence in SRS. Any potential conflicts should be disclosed to SRS.

Business Continuity Planning: Suppliers shall be prepared for potential disruptions to their operations (e.g., natural disasters, terrorism, supply chain disruptions, outbreaks of infectious diseases—epidemics or pandemics, issues related to information security, cyberattacks). This preparedness includes plans to ensure business continuity and to protect both employees and the environment from the impacts of any serious disruptions within the scope of operations.

Intellectual Property and Data Protection: Suppliers must protect SRS's intellectual property and handle confidential information responsibly and not disclose it to third parties. Compliance with data protection laws, such as the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), is required. Suppliers shall ensure that

they have sufficient cybersecurity measures in place to protect them from any form of cybersecurity threats or malicious attacks.

Environmental Sustainability

SRS's vision of a sustainable future requires Suppliers to minimize their environmental impact. We expect all Suppliers to comply with applicable legal environmental requirements and obtain and keep current all required environmental permits, approvals, and registrations, and follow all reporting requirements. Furthermore, the Supplier should demonstrate and encourage the development and diffusion of environmentally friendly technologies following the mind-set Reduce – Reuse – Recycle in all processes.

Environmental Management: Suppliers must have an environmental policy and management system that sets and monitors goals for reducing environmental impact. Suppliers should:

- identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal,
- optimise its consumption of natural resources, including energy and water, and

- prevent pollution and minimize generation of greenhouse gases, solid waste, wastewater and other air emissions.

Resource Management and Waste Reduction: SRS expects its Suppliers to manage their operations responsibly in relation to environmental risks and impacts and to adopt a precautionary approach including implementing and demonstrating solutions to prevent pollution and minimize generation of solid waste, wastewater and air emissions. Prior to discharge or disposal, Suppliers shall characterize and treat wastewater and solid waste appropriately and according to applicable laws and regulations.

Product Development: Suppliers should design products with a focus on minimizing environmental impact, using recyclable or reusable materials.

Continuous Improvement: Suppliers are encouraged to continuously improve their environmental and sustainability practices through target setting and performance reviews.

Implementation and Monitoring

Suppliers must ensure all employees and subcontractors involved in delivering products or services to SRS are informed about this SCoC or an equivalent internal code. Suppliers must monitor compliance within their organization and supply chain, maintain relevant documentation, and provide it to SRS upon request. Significant operational changes must be communicated to SRS promptly.

Raising Concerns

If the Supplier, its employees or its contractors believe that the terms of the SCoC are not adhered to, or that the SRS representative is not acting in accordance with the SCoC, SRS encourages such concerns to be raised (This can be done anonymously) via SRS's whistleblower function at: svenskaretursystem.whistlelink.com

Audit and Transparency

SRS reserves the right to verify Supplier compliance through audits, which may be conducted on-site or via other methods, such as self-assessment questionnaires. Audits may be announced or unannounced and performed by SRS or a third party on SRS's behalf.

Suppliers are obligated to:

- Grant access to relevant facilities.
- Provide all necessary information, documents, and records upon request.
- Complete and return requested questionnaires or surveys promptly.

Corrective Actions and Enforcement

If a Supplier fails to meet the SCoC requirements, SRS will provide guidance for corrective action. Suppliers must act promptly and demonstrate progress. If the Supplier fails to carry out corrective actions, SRS reserves the right to cancel outstanding orders, suspend future orders or terminate the Supplier's activities with SRS. Should the main contract between SRS and the Supplier contain separate termination rules, it is nevertheless understood by both parties that breach of the requirements set out in this SCoC may be considered a material breach of contract, thus entitling SRS to terminate the contract.

