

Oras Group Supplier Code of Conduct

Oras Group is committed to ethical, sustainable, and socially responsible practices.

Oras Group's Code of Conduct serves as the foundation of the company's identity, work community, and commitment to responsible corporate citizenship. Rooted in Oras Group's core values, the Code of Conduct defines our company culture and guides our decisions and actions, both big and small. These values apply universally to all members of Oras Group, fostering integrity, accountability, and ethical behaviour in everything we do. We adhere to all relevant national and international laws and regulations while upholding the highest ethical standards. This Supplier Code of Conduct is an extension of these commitments. Its purpose is to ensure that Oras Group suppliers and their supply chains operate in full compliance with applicable laws and meet the same high standards of ethical conduct, environmental stewardship, and social responsibility that we uphold. These principles are fundamental to maintaining our shared vision of sustainability, integrity, and fair business practices.

This **Supplier Code of Conduct** is a binding part of any agreement or contract between Oras Group and its suppliers. The definition of "Supplier" also includes the Supplier's own 1st tier suppliers, contractors, and other business partners participating in the delivery of products, components, materials, or services to Oras Group. The Supplier shall ensure that its own 1st tier suppliers, contractors, and other business partners participating in the delivery of products, components, materials and services to Oras Group comply with the minimum requirements established in this Code, and that the Code is communicated by the Supplier to them. This Code defines the minimum requirements for employment practices, environmental protection, and business integrity that

we expect from all suppliers and their respective supply chains.

By adhering to these principles, suppliers not only contribute to a sustainable future but also strengthen the foundation of our mutual success. Oras Group looks forward to working together with all its suppliers to uphold these standards and address any challenges proactively.

As our supplier, you are expected to adhere to the following principles, ensuring alignment with international standards and regulations:

1. Legal compliance and ethical business practices

Suppliers are required to comply with all applicable laws, regulations, and governmental directives in the countries and regions where they operate. If local laws or customs differ from this Supplier Code of Conduct, the more stringent standard will be applied. Oras Group strictly prohibits any non-compliance and will never encourage or instruct any party to violate legal or regulatory obligations. Suppliers shall always:

- Fully comply with all applicable local, national, and international laws, regulations, and standards.
- Adhere to responsible business practices in all activities and conduct any business fairly, ethically, with integrity, and in compliance with anti-corruption laws.
- Comply with all applicable laws and regulations related to anti-money laundering and the prevention of financial crimes. Suppliers are expected to conduct appropriate due diligence on business partners, maintain transparent financial records, and avoid transactions that could facilitate money laundering, fraud, or other illicit activities.



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2. Human rights and labour practices

In all their operations, suppliers are expected to uphold and respect internationally recognised human rights, as outlined in the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the core principles of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, including:

- Child labour prohibition: Do not employ individuals below the legal working age as defined by applicable laws or international standards.
- Elimination of forced labour: Reject all forms of forced, bonded, prison, military, or compulsory labour, including human trafficking. The employees must have freedom of movement during their employment.
- Non-discrimination: Ensure equal opportunities and treatment, avoiding discrimination based on gender, age, race, ethnicity, religion, disability, sexual orientation, or any other protected characteristic.
- Freedom of association: Uphold employees' rights to discuss working conditions and labour matters with management in accordance with local laws and regulations and without fear of retaliation.
- Fair wages and benefits: Provide wages and benefits that meet or exceed legal and industry standards, respecting local minimum wage laws and ensuring fair compensation for skills and performance.
- Working hours: Adhere to legal regulations on working hours, ensuring reasonable working conditions and adequate rest periods.
- Harassment-free workplace: Maintain a workplace free from any form of harassment, abuse, or intimidation – including physical, verbal, psychological, and sexual misconduct. Any behaviour that creates a hostile or offensive work environment is strictly

prohibited. Suppliers are expected to establish clear policies and procedures to prevent and address harassment and to promote a culture of respect and inclusion.

- Diversity & equality: Treat all employees equally, regardless of gender, age, race, ethnicity, religion, disability, sexual orientation, or any other legally protected characteristic. Suppliers are expected to ensure that everyone has the opportunity to contribute and thrive within their organisations.

3. Occupational health and safety

Oras Group recognises that a safe and healthy workplace is fundamental to employee well-being, productivity, and overall business success. We expect our suppliers to share this commitment by prioritising the health and safety of their employees in all aspects of their operations and require the following:

- Provide a safe and healthy working environment that complies with applicable health and safety regulations.
- Take proactive measures to prevent workplace hazards and accidents.
- Ensure that living accommodations provided by the company meet health and safety standards.

4. Environmental responsibility

Oras Group is dedicated to minimising negative environmental impact and promoting sustainability throughout our value chain. Our suppliers play a critical role in our shared commitment to creating a sustainable future by integrating environmental responsibility into their operations and decision-making. Suppliers must ensure that they:

- Comply with all applicable environmental laws and regulations.



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- Take measures to minimise negative environmental impact by promoting energy efficiency and responsible use of chemicals, minimising waste, preventing harmful releases to air, water, and soil, and reducing greenhouse gas emissions.
- Ensure that raw materials such as nickel, tin, tungsten, tantalum, and gold (3TG) are sourced in accordance with sustainable practices and do not originate from conflict-affected and high-risk areas, as defined by existing EU regulations, such as the EU Conflict Minerals Regulation ((EU) 2017/821).
- Commit to protecting biodiversity and enhancing resource efficiency.

5. Product compliance

Oras Group is committed to providing products that meet the highest standards of quality, safety, and sustainability. We expect our suppliers to ensure that all supplied products and materials comply with applicable laws, regulations, and industry standards and are delivered according to our defined specifications. This includes supporting sustainable sourcing practices and striving for continuous improvement in product design and manufacturing to minimise environmental impact. Suppliers shall:

- Ensure products meet regulatory requirements for prohibited and restricted substances.
- Take proactive steps to improve energy efficiency and reduce the environmental footprint of products and production processes.

6. Data privacy and intellectual property

Protecting data and respecting intellectual property rights are integral to maintaining trust and fostering innovation in our business relationships. Oras Group

expects its suppliers to handle all personal data with confidentiality and in accordance with applicable data protection laws. Suppliers shall:

- Protect the confidentiality and security of personal data, ensuring it is processed responsibly and used only for legitimate purposes.
- Respect and safeguard intellectual property rights, avoiding unauthorised use or disclosure.

7. Anti-corruption and fair competition

Oras Group operates with integrity and transparency, rejecting all forms of corruption and unethical business practices. We expect our suppliers to uphold these values by following anti-corruption laws and ensuring fair competition in all their dealings. Oras Group suppliers must have a zero-tolerance policy against bribery and corruption. Ethical conduct is essential to building trust and fostering long-term partnerships. Suppliers shall:

- Abstain from all forms of corruption, including bribery and facilitation payments, to influence public officials or business partners.
- Have standards and procedures in place to ensure that directors, employees and third parties acting on their behalf do not offer, promise, give, or accept any bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any other improper advantage.
- Not provide Oras Group's employees with any gifts or hospitality in any situation where said gifts or hospitality might influence, or appear to influence, an employee's decision in relation to the supplier.
- Ensure fair competition and avoid any anti-competitive practices or agreements.



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8. Conflict of interest

Maintaining impartiality and avoiding conflicts of interest are key to ethical business relationships. We value transparency and expect suppliers to prioritise integrity in all interactions. All suppliers are requested to:

- Avoid situations that create or appear to create any kind of conflict of interest with Oras Group.

9. Trade compliance

Oras Group requires its suppliers to ensure that their operations and supply chains adhere to legal requirements, fostering smooth and lawful international trade. Suppliers are required to:

- Fulfill all trade compliance requirements, including those related to export, import, customs, and sanctions.

10. Substance abuse prevention

A safe and productive working environment is essential to the success of all stakeholders. Suppliers must strive to:

- Maintain a workplace free from the influence of alcohol and drugs in order to ensure a safe and productive working environment.

11. Responsible business practices

Oras Group believes in conducting business responsibly, balancing economic performance with social and environmental accountability. Suppliers are expected to:

- Conduct due diligence to identify, prevent, and mitigate risks related to human rights, labour, the environment, and ethics.
- Make reasonable efforts to ensure that your suppliers and subcontractors adhere to the principles outlined in this Code.

- Promote transparency in business practices and communicate honestly about your operations and challenges. Maintaining ethical and responsible business practices requires open communication and the ability to report concerns without fear of retaliation. Oras Group strongly recommends its suppliers to provide employees accessible and confidential channels for reporting unethical behaviour, violations of this Supplier Code of Conduct, or other concerns related to legal and regulatory compliance.

Oras Group furthermore encourages suppliers and their employees to report any suspected misconduct, including breaches of this Code, through our **whistleblowing channel**, which can be found at: <https://report.whistleb.com/en/orasgroup>. Reports can be made anonymously, where permitted by law, and Oras Group guarantees that all concerns will be taken seriously and handled confidentially. Retaliation against individuals who raise concerns in good faith will not be tolerated.

Oras Group takes compliance with this Supplier Code of Conduct seriously and requires all suppliers to strictly adhere to the principles outlined in this Supplier Code of Conduct. Suppliers must take appropriate measures to ensure compliance throughout their operations and supply chains and shall make the mentioned standards and regulations accessible to all their employees. Oras Group reserves the right to monitor compliance through on-site audits or self-evaluation questionnaires, which may be conducted periodically or as deemed necessary by Oras Group.



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Failure to comply with any of the requirements in this Code of Conduct may result in corrective actions, including but not limited to suspension or termination of the business relationship. Oras Group is committed to working collaboratively with suppliers to resolve any issues, but violations that compromise the integrity of our business or that of our partners will not be tolerated.

By continuing their business relationship with Oras Group, suppliers acknowledge and agree to comply with the principles and requirements of this Supplier Code of Conduct.

Approved by the Oras Group Management Team,
March 2025.

