

Revision date: 13/12/2023



Coolbrook Supplier Code of Conduct

1 INTRODUCTION

- 1.1 Coolbrook is committed to compliance and sustainability through the supply chain. This Supplier Code of Conduct (the “Code”) amends Coolbrook’s Code of Conduct and sets out the principles according to which we expect all our suppliers to operate.

2 SCOPE AND REQUIREMENTS

- 2.1 This Code is applicable to Coolbrook’s suppliers globally and it is based on recognized international standards on human rights, labour conditions, environment and anti-corruption.
- 2.2 Coolbrook’s suppliers are obliged to comply with the principles of this Code in all their business activities and to ensure and monitor compliance with the Code among their respective suppliers. All suppliers shall also comply with any additional requirements set out in the contract documents.
- 2.3 Coolbrook’s suppliers shall confirm compliance with this Code by continuously documenting compliance, providing information to Coolbrook upon request, and allowing audits by Coolbrook or on its behalf. Furthermore, Coolbrook’s suppliers are expected to inform Coolbrook proactively and without delay of any breach of this Code.
- 2.4 Material breach of the Code, or repeated refusal to provide required information, may lead to the termination of cooperation with Coolbrook.

3 REQUIREMENTS FOR SUPPLIERS

3.1 Compliance with Laws and Business Ethics Standards

Coolbrook’s suppliers shall comply with the applicable laws and regulations in all locations where they conduct business and act in accordance with the highest business ethics standards.

3.2 Conflict of Interest

Coolbrook’s suppliers shall avoid any situations where a conflict of interest between the supplier and Coolbrook exists and shall disclose any potential or existing conflict of interest to Coolbrook.

3.3 Confidentiality, Intellectual Property

Coolbrook’s suppliers shall safeguard the security of Coolbrook’s information and intellectual property rights, and to process personal and other data properly.

3.4 Fair Marketing and Competition Practices

Coolbrook’s suppliers shall conduct responsible marketing and compete fairly and ethically in all other respects.

3.5 Anti-Corruption, Anti-Bribery

Coolbrook’s suppliers shall avoid any form of bribery or corruption; providing Coolbrook representatives with any gifts or hospitality in any situation in which it might influence, or

appear to influence, a representative's decision in relation to the supplier, is strictly prohibited.

3.6 Anti-Money Laundering

Coolbrook's suppliers shall implement protective measures and refrain from any activities which may be considered participating in or enabling money laundering.

3.7 Sanctions; Export Control

Coolbrook's suppliers shall comply with the applicable laws and regulations regarding export control and export restrictions, as well as economic sanctions imposed by the EU, the US, the UK and the UN.

3.8 Human Rights

Coolbrook's suppliers shall support and respect internationally proclaimed human rights, and ensure not being involved in human rights violations, directly or indirectly.

3.9 Labour Standards

Coolbrook's suppliers shall recognize and respect employees' freedom of association and their right to collective bargaining.

3.10 Forced Labour

Coolbrook's suppliers shall oppose and not participate in, or benefit from, the use of forced and/or compulsory labor, child labour or human trafficking in any form.

3.11 Wages and Working Hours

Coolbrook's suppliers shall ensure that all employees are provided with fair and reasonable salary and working conditions in accordance with the industry standards and, at least, such required by the applicable laws.

3.12 Non-Discrimination

Coolbrook's suppliers shall treat their employees with respect and no discrimination in any form, regarding e.g. race, ethnicity, nationality, gender, age, religion, political views, sexual orientation, disability or otherwise, shall be accepted.

3.13 Health and Safety

Coolbrook's suppliers shall provide their employees with a safe and healthy workplace in compliance with the applicable laws.

3.14 Environment

Coolbrook's suppliers shall comply with the applicable environmental laws and regulations, consider the climate impact of their operations and take all reasonable efforts to reduce their environmental footprint.