

## THIRD PARTY CODE OF CONDUCT

Techstep is a complete mobile technology enabler, making positive changes to the world of work; freeing people to work more effectively, securely and sustainably. We help customers who want to work smarter, while also delivering on their ESG commitments. Sustainability is an integral part of our business and strategy, in order to deliver long-term stakeholder value.

### OUR APPROACH

We recognise that our mission can only succeed in close cooperation with our suppliers and business partners, hereinafter referred to as Third Parties. This Third Party Code of Conduct sets out the ethical principles we expect our Third Parties to follow and promote throughout their own operations and supply chains. We see our Third Party relationships as opportunities to continuously improve practices together.

This Code is not exhaustive, and situations may arise where it does not provide explicit guidance. In all cases, Third Parties are expected to comply with applicable laws and regulations and exercise sound judgement consistent with the principles outlined here.

Our expectations are aligned with internationally recognised standards, including:

- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Fundamental Conventions
- UN Universal Declaration of Human Rights
- UN Convention on the Rights of the Child
- UN Convention against Corruption

Where international standards offer stronger protection than national law, Third Parties must take reasonable measures to follow the higher international standard.

### OUR EXPECTATIONS OF THIRD PARTIES

#### General

- Comply with all applicable laws and regulations in which you operate
- Provide correct and consistent information to stakeholders in a timely manner and upon request
- Be transparent about efforts and challenges to enhance learning and improvement
- Be determined to continually improve, and engage your own value chain to advance efforts over time
- Not to conduct any business directly or indirectly with Third Parties on the sanction list. The sanction list refer to a person, group or legal entity in public economic- and/or travel sanction lists published by the United Nations Security Council, the list of persons, groups and entities subject to EU and EEC financial sanctions and/or its member states. Specifically, any trade with any entity within the following states require specific up-front approval of the CEO or Techstep ASA: Russia, Belarus, North Korea and Iran.

## **Human rights and labour practices**

- Treat people with dignity and respect, and not tolerate any forms of discrimination, harassment, humiliation, or abuse
- Pay fair wages to all employees, on time and in accordance with legal requirements. Wage statements shall be understandable and provided in a timely manner.
- Ensure that work is in compliance with regular working hours/ days, overtime is paid for, breaks, rest periods, holidays and parental leave is respected
- Ensure all work is completed voluntarily. No employees, contractors or agents of the organisation should be forced, bonded, indentured or subject to threat or involuntary labour. They must also be free to terminate their employment with reasonable notice. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment.
- Avoid any form for child labour by respecting the local minimum age for employment for work. If young workers are employed, they must not do work that is mentally, physically, socially or morally dangerous or harmful, or interfere with their opportunity to attend school and develop.
- Respect and support the free association of labour and employee rights to join a trade union, where allowable by law
- Pay special attention to those most vulnerable to adverse human rights impacts, including women, children, migrant workers, workers with a disability or from a minority background
- Prevent and address the risk of human rights impacts linked to your business

## **Health and safety**

- Provide a working environment that is physically, psychologically and socially safe
- Manage health and safety systematically in accordance with international standards, adopted to the Third Party's size and complexity of operations

## **Environmental management**

- Seek efficient and sustainable use of resources and strive to minimise impact on biodiversity, climate change and water scarcity
- Work proactively to incorporate environmental considerations into product design, day-to-day operations and supply chain management
- Manage waste responsibly and adopt circular economy principles into the business model
- Seek to improve energy efficiency and shift to renewable energy sources where possible
- Keep an environmental management system, and track, document and report on progress

## **Ethical business conduct**

- Behave ethically, with integrity and honesty
- Not tolerate any form of corruption in own business or among suppliers or business partners, and ensure compliance with all applicable anti-bribery, anti-fraud, anti-tax evasions
- Compete fairly and make business decisions in the best interest of the companies involved, without letting personal relations or considerations influence decision-making
- Commit to responsible sourcing, and take appropriate steps to avoid use and supply of minerals whose sourcing could be linked to human rights violations and to direct or indirect support to armed conflict minerals
- Respect and protect know-how and intellectual property rights
- Provide an easy, accessible whistleblower channel, with possibility of confidential, anonymous and protected reporting without fear of retaliation

## **Information security and personal data protection**

- Third Parties with access to sensitive information shall actively protect this information against unauthorised access, use, disclosure, disruption, modification, inspection, recording and destruction

## **COMPLIANCE**

We expect our suppliers and other business partners to respect the principles set out in this Third Party code and ensure that their subcontractors are informed and comply with accordingly.

We recognise that different Third Parties may be at different stages of maturity and are committed to supporting them to improve their ability to meet these expectations. We welcome open and honest discussions with Third Parties where they feel they might not be able to fully adhere to the code and the opportunity to explore solutions to these challenges.

Techstep will work systematic evaluating the sustainability risks linked to our Third Parties and sub-Third Parties and how they live up to expectations set out in this Third Party code. Persistent failure to comply with these standards or with applicable laws and regulation may result in termination as a Techstep Third Party, where this right has been contractually agreed in advance by both parties, and referral of the matter to local authorities.

We encourage Third Parties to report any potential misconduct of this code to [compliance@techstep.io](mailto:compliance@techstep.io) or through our anonymous whistleblower channel available from our website.

**TECHSTEP THIRD PARTY CODE OF CONDUCT COMMITMENT**

We hereby confirm that we have read and understand Techstep’s Third Party Code of Conduct. We further confirm that have full knowledge of all relevant laws in the countries where we operate, as well as the international standards referred to in this code.

We agree to comply with Techstep’s Third Party Code of Conduct, to take responsibility for informing own suppliers, sub-suppliers, manufacturers and business partners involved in the production and supply of mobile devices and services for Techstep about the requirements in this code.

Date:

Company name:

Name

Title:

Signature by authorised company signatory: