



## Supplier Code of Conduct

**December 2024**

<b>Ansvarlig:</b> Sverre Rosén	<b>Godkjent av:</b> Jeroen Hoff	
<b>Versjon:</b> 3	<b>Sist revidert:</b> 18.12.2024	<b>Neste revisjon:</b> 31.12.2025

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## Introduction

Connect Bus AS (“Connect Bus” also “the Company”) is a Nordic bus company with operations in Sweden and Norway. CBRE Investment Management is the sole shareholder in the Company. The Company has a Board of Directors, comprising of representatives of the shareholder, an Independent Non Executive Director and an Independent Chairperson.

## Governance

Connect Bus is committed to conduct its business in accordance with the applicable laws and regulations and to abide to the highest ethical and business conduct standards. Amongst these, the Supplier Code of Conduct explicitly refers to:

- UN Convention on the Rights of the Child, article 32
- ILO Forced Labour Convention, No.29
- ILO Freedom of Association and Protection of the Right to Organize Convention, No.87
- ILO Right to Organise and Collective Bargaining Convention, No.98
- ILO Equal Remuneration Convention, No.100
- ILO Abolition of Forced Labour Convention, No.105
- ILO Discrimination (employment and occupation) Convention, No.111
- ILO Workers’ Representatives Convention, No.135
- ILO Minimum Age Convention, No.138
- ILO Worst Form of Child Labour Convention, No.182

EU-sanctions against certain countries, supported by the Norwegian and/or Swedish government, shall be respected by the Company and its suppliers.

This Supplier Code of Conduct sets forth the Company’s fundamental ethical and business conduct requirements for its suppliers. Suppliers are responsible for ensuring that their personnel, agents, representatives, suppliers, subcontractors and other business partners understand and comply with the requirements set forth in this Supplier Code of Conduct. It is the responsibility of the supplier to notify Connect Bus in writing of any known or suspected violation of this Supplier Code of Conduct.

Connect Bus will assess the supplier’s compliance with the principles and commitments of this Supplier Code of Conduct during the provision of services and/or furnishing of products. Such assessment might include, inter alia, on-site inspections of facilities and review of information such as books, records, certifications, permits and other documentation evidencing supplier’s compliance with this Supplier Code of Conduct.

This Supplier Code of Conduct will be updated periodically by management to reflect regulatory, industry, market and other developments and approved by the Board of Directors annually, at a minimum.

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## Commitments

The Supplier must:

- Never offer, promise, authorise or provide, directly or indirectly, anything of value (including, without limitation, business gifts or courtesies) with the intent or effect of inducing anyone to forego their duties and provide unfair business advantage to Connect Bus, the supplier or others. The Supplier and all its employees, agents, representatives, suppliers, subcontractors and other business partners will comply with all the laws on **anti-bribery, anti-corruption, anti-money laundering** and the prevention of **fraud** and other **financial crime**, including **tax evasion** and its facilitation, in all the countries in which the supplier and any of its affiliates or associates conducts business, directly or indirectly
- Not give or receive from any director, employee or representative of Connect Bus any **gift, entertainment or other favour of material value**, or any commission, fee or rebate, with the intent or effect of inducing anyone to forego their duties and provide unfair business advantage to Connect Bus, the supplier or others
- Never engage in any illegal **anti-competitive conduct or deceptive trade practices**
- Comply with all applicable **data protection, privacy and information security** laws and regulations, including those pertaining to Connect Bus
- Protect the **confidential, proprietary and personal information** it processes by implementing appropriate technical and organisational measures to ensure a level of security appropriate to risk and continued compliance with applicable data protection and privacy regulations. The supplier must only engage subcontractors and other business partners who ensure the same level of technical and organisational security. The supplier must, without undue delay, notify Connect Bus if it reasonably suspects a **data breach** of any information processed on behalf of Connect Bus occurred, making available all information reasonably requested to assist in the investigation and remediation of such breach and ensure compliance with all obligations under the applicable law
- Avoid **conflicts of interest** or situations giving the appearance of a conflict of interest, promptly notifying Connect Bus of any instances of actual or apparent conflict between the supplier's interest and that of Connect Bus
- Recognise that **adverse effects** of its activities on the community, environment and natural resources must be **minimised**. To this end, the supplier must comply with all applicable **environmental laws** including, without limitation, those which relate to (i) obtaining and maintaining required environmental permits, approvals and registrations, as well as complying with applicable operational and reporting requirements; (ii) the handling, removal, transportation and disposal of hazardous materials used by the supplier; and (iii) monitoring, controlling, treating and sanitising air emissions, waste water and solid wastes
- Seek opportunities that promote the **efficient sourcing of materials, use of resources and energy**, as well as **clean energy and low emissions solutions**

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- Comply with the United Nations Universal Declaration of Human Rights, respecting the **human rights** of, without limitation, temporary, migrant, student, contract, direct and any other type of employee, in all its operations. The supplier must not engage in or condone **child labour** and commits to combat the unlawful exploitation and employment of children, therefore prohibiting any use of child labour by vendors, subcontractors and other business partners, working with law enforcement authorities to address any such instances the supplier becomes aware of
- Respect the **free choice** of all persons and strictly prohibit **forced or compulsory labour** and commit to not do business with, tolerate or associate with organisations and entities that condone or are engaged in the practice of coercing or imposing work with little or no freedom of choice, working with law enforcement authorities to address any such instances the supplier becomes aware of;
- Commit to the highest standards of **equality, diversity and inclusion**, ensuring an equitable, diverse and inclusive workplace, free of **harassment and discrimination**
- Commit to safe and **secure working conditions**, providing a safe and secure workplace to all its employees
- Comply with all **health, safety and security laws** of the jurisdictions in which it does business and limit worker exposure to potential safety hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures. If necessary to perform a job, the supplier will provide workers at no cost the proper personal protective equipment and ensure its proper maintenance
- Record, track and report all **occupational injuries and illnesses** as required by the applicable laws, encouraging worker reporting, classifying and recording cases of injury and work-related illness, providing necessary medical treatment and investigating and implementing corrective actions to eliminate their causes
- Commit to be an **ethical employer**, respecting its employees' contributions and rewarding them fairly, while striving to improve **labour standards**
- Ensure employees are free to raise concerns **without fear of retaliation** in any form, providing **whistleblower protection**
- Comply with all laws concerning employees' **freedom of association** and collective bargaining, and
- Cooperate with Connect Bus in the assessment of the supplier's compliance with this **Supplier Code of Conduct**, promptly correcting any instances of non-conformance identified during such assessments and agreeing to participate in Connect Bus-selected third-party monitoring services as Connect Bus may direct, at the own expense of the supplier.

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