

Gapwaves Supplier Code of Conduct

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Gapwaves' Supplier Code of Conduct shall be the basis and defines the minimum standard for all companies supplying goods or services to Gapwaves. These minimum standards reflect the corporate values of Gapwaves and apply to all suppliers as well as their subsidiaries and branches. Gapwaves requests suppliers to obligate their subcontractors to comply with this code of conduct. Any violation against this Supplier Code of Conduct may result in termination of business relations and contracts with Gapwaves.

1 Compliance with the relevant laws and standards

The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Children's Rights and Business Principles, the United Nations on Business and Human Rights, the international labor standards of the International Labor Organization as well as the United Nations Global Compact. Suppliers have to act in full compliance with all relevant laws, rules, requirements of standards and regulations at all times.

Gapwaves' suppliers shall have implemented, or plan to implement, a holistic management system covering quality and environmental dimensions. Gapwaves preferred management systems are ISO9001, ISO14001, IATF16949 and ISO45001.

2 Social responsibility

2.1 Exclusion of child labor

Child labor must not be used at any stage. Gapwaves requests suppliers to adhere to the recommendation from the ILO conventions on the minimum age for the employment of children. According to this, the age should not be less than the age at which compulsory schooling ends and in any case not less than 15 years.

2.2 Exclusion of forced labor

Suppliers must not support, or use forced labor, slave labor, bonded labor, or human trafficking. All work must be voluntary, and workers must be able to end employment at any time.

2.3 Fair pay and working hours

The remuneration paid to the employees must comply with all applicable laws on wages, including, for example, laws on minimum wages or overtime. If the legal minimum wage does not cover the cost of living, the business partner is obliged to pay a wage that covers the basic needs. Deductions from wages as a disciplinary measure shall not be permitted. Working hours must comply with all relevant laws or benchmark industry standards.

2.4 Non-discrimination

Suppliers shall hire employees solely based on their professional skills. They do not use or permit physical discipline. Suppliers do not engage in discrimination or harassment based on gender, race, color, religion, ethnicity, social background, age, sexual orientation, national origin, disability, political opinion, or any other legally protected characteristics.

2.5 Freedom of association/ Freedom of assembly

Suppliers shall respect the right of employees to freedom of association, to union membership, to appeal to labor representatives or to work as council membership in accordance with local laws. Employees shall communicate openly with management without fear of reprisal or harassment. Suppliers respect the freedom of assembly and the formation of interest groups and advocate for the protection of the rights of employees.

3 Health and safety in the workplace

Suppliers are responsible for a safe and healthy working environment and minimize physical hazards through proper design, technical and administrative inspections, preventive maintenance, and safe working practices, as well as regular safety training. Suppliers shall provide their employees with appropriate personal protective equipment and ensure that physical guards, interlocks, and barriers are in place wherever machinery poses a potential risk of injury to workers. In addition, suppliers shall provide training on health and safety issues to ensure that employees are properly educated and trained.

4 Environment

4.1 Air emission

Emissions from operations, including greenhouse gas emissions, shall be identified, routinely monitored, inspected and, if necessary, treated prior to their discharge. Gapwaves' suppliers shall continuously strive to reduce their air emissions.

4.2 Energy efficiency

Gapwaves' suppliers are required to monitor their energy consumption, and to strive for continuously improved energy efficiency in their operations.

4.3 Waste handling

Gapwaves' suppliers shall follow a systematic approach to identify, handle, reduce and responsibly dispose or recycle waste. Chemicals or other materials that pose a hazard if released into the environment shall be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse and disposal.

4.4 Raw materials and natural resources

Gapwaves' suppliers are required to monitor their use of raw materials and natural resources of all kinds, and to strive for continuously more efficient use of raw materials and natural resources.

4.5 Transportation

Gapwaves' suppliers shall use environmentally friendly modes of transportation both upstream and downstream in the supply chain whenever possible.

5 Ethics and Compliance

5.1 Fair competition

Gapwaves' suppliers are required to accurately and fully report and disclose information about their business, structure, financial condition, and performance in accordance with applicable laws as well as recognized industry practices. Suppliers shall ensure compliance with all applicable laws for the import and export of goods, services, and information as well as with applicable embargoes and sanctions.

5.2 Fraud, extortion, theft, corruption & intellectual property

Suppliers shall forbid any form of fraud, extortion, theft, or embezzlement by their personnel. Suppliers must safeguard all intellectual property rights and protect information of Gapwaves. The transfer of technologies and company know-how must be carried out with full respect for all intellectual property rights.

Gapwaves require that all business activities are based on the highest integrity standards. Gapwaves' suppliers must pursue a policy of "zero tolerance" against any form of bribery, corruption, extortion, and embezzlement.

Suppliers shall have governance and processes to monitor adherence to standards to ensure compliance with anti-corruption laws.

5.3 Non-disclosure/ privacy

Gapwaves' suppliers are required to meet reasonable expectations of their principal, suppliers, customers, consumers, and employees with regard to the protection of private information. Company and business secrets as well as confidential information must be kept secret.

Suppliers shall observe the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting, and forwarding personal information. In the event of the termination of employment, the obligations of confidentiality shall survive such termination.

5.4 Conflict Minerals

Gapwaves' suppliers must ensure that manufactured and delivered products do not contain "Conflict Minerals" (minerals associated with tin, tantalum, tungsten, and gold). If so, the suppliers shall comply with the EU Conflict Minerals Regulation.

5.5 Information security

Suppliers with access to Gapwaves systems or information shall implement appropriate information security controls.

5.5.1 Access and authentication

Suppliers shall apply the principle of least privilege to all access to Gapwaves systems and information. Multi-factor authentication (MFA) is mandatory for all access to Gapwaves systems.

5.5.2 Data handling

Information classified as Confidential by Gapwaves shall be encrypted in transit and at rest, and may only be shared via approved channels. Suppliers must not store Gapwaves information on unmanaged devices, personal cloud accounts, or non-approved services.

5.5.3 Devices

Devices used to access Gapwaves systems or information shall be protected with disk encryption, screen lock, and up-to-date security patches.

5.5.4 AI tools

Suppliers must not input Gapwaves confidential information, personal data, or source code into any AI service not expressly approved in writing by Gapwaves.

5.5.5 Incident reporting

Security incidents that may affect Gapwaves information or systems shall be reported to Gapwaves without delay.

6 Implementation of the requirements

Gapwaves may verify compliance with this Code of Conduct through a self-assessment questionnaire and audits at supplier production sites. Gapwaves reserves the right to audit the suppliers' suppliers and/ or subcontractors for compliance with this Code of Conduct. Gapwaves reserves the right to take appropriate action against suppliers who do not comply with this Code of Conduct, which may ultimately result in termination of the supply relationship.

Laban Cramér
Supply Director
Gapwaves

Supplier name:

Title:

Company:

Signature:

Date:

INTERNAL ONLY

CHANGE LOG

Version	Change	Issuer	Date
3	Chapter 4.5 added Change log added	Laban Cramér	2024-08-08
4	Change of template	Claes Haglund	2025-01-30
5	Chapter 5.5 Information security added	Claes Haglund	2026-09-21