



## Supplier code of conduct

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## Document history

Version	Date	Reason
1.0	2023-04-05	New instruction
2.0	2024-03-18	Updated metadata, no new or changed content
3.0	2025-02-13	Sentence added about ensuring compliance with import and export regulations

## 1 General

EKE Electronics Ltd. (hereinafter referred to as "EKE") has management level commitment to support ethical business practices. With regards to suppliers, compliance with these rules and principles is required for the establishment of new commercial relations and their continuity in time.

This EKE supplier code of conduct defines the main principles underlying supplier's business activities as one of our suppliers. As EKE's supplier one must comply with all applicable laws and regulations, the requirements set out in this EKE supplier code of conduct and contractual obligations to EKE. In order to ensure the compliance with requirements set by EKE, the supplier shall keep record of all relevant documentation and grant EKE an access to audit and inspect the supplier's operations and facilities. In case a supplier displays behaviour that are not in line with requirements set by EKE, EKE shall have the right to take the appropriate measures against the supplier, including rejecting future collaboration or terminating the current relationship.

The supplier shall be open, honest and accurate, and its business activities transparent, when communicating with EKE.

Although this supplier code of conduct is applicable to EKE's direct suppliers, EKE requests its suppliers to transfer the following principles to their own suppliers in the supply chain.

## 2 Compliance with relevant legislation

The supplier shall comply with all applicable laws and regulations, and conform with the requirements of good citizenship in each jurisdiction where the supplier performs its activities. This includes, but is not restricted to, compliance with laws and regulations on competition, corporate governance, taxation, financial disclosure, employee rights, environmental protection, occupational health and safety, and export control.

### 3 Human rights and fair labour conditions

The supplier shall support and respect the protection of human rights, as defined in the United Nation's Universal Declaration of Human Rights. The supplier is not allowed to take any action that violates these human rights principles, either directly or indirectly.

The supplier must respect applicable labour laws and regulations including, but not limited to, minimum wage, equal treatment and non-discrimination, protection against child exploitation and against modern slavery, respect for diversity and promotion of social inclusion, length of the workday, days off, compensation, freedom of association and the right to collective bargaining.

### 4 Health and safety

The supplier shall provide a safe and healthy workplace for all its employees. The supplier shall formally appoint a competent person to manage health and safety, to establish appropriate organizational structures and procedures for the effective management of health and safety, and ensure that all employees are sufficiently aware of the risks and appropriately trained on the implementation of control measures.

In case the Services or part of them are carried out by personnel of the Supplier in the business premises of third Party designated by EKE, The Supplier shall at all times monitor compliance with the safety rules of the third party and/or EKE. The Supplier shall make sure it has all needed registrations, certificates and insurances to be allowed to send its personnel on site. The Supplier shall make sure that all of its employees travelling on-site have all required safety-related trainings completed and personal safety equipment available. The Supplier shall remain responsible for its employees to follow all safety instructions on site.

### 5 Environment

EKE is working determinedly to reduce our environmental footprint by developing our products, improving our operations, reducing waste and recycling reusables. The same EKE expects from its suppliers. The supplier shall have appropriate environmental management system in place to conduct its business in an environmentally sustainable way, carrying out activities to minimize negative environmental impacts, protect climate and prevent pollution.

### 6 Restricted materials

The supplier shall follow and comply with all relevant laws and regulations related to substance and material restrictions. The supplier shall certify and ensure that no "conflict minerals" originated in conflict-affected or high-risk areas, are produced, or contained in the supply, including those from its own

suppliers. The supplier shall implement a policy regarding conflict minerals and exercise due diligence to investigate the source of these minerals.

Suppliers must ensure full compliance with all import and export regulations and restrictions. Any updates or changes to these regulations concerning Supplier's products shall be reported to EKE without delay during the duration the of contract.

## **7 Business ethics**

The supplier shall conduct its business in an ethical manner and adhere to anti-trust and other competition laws. In particular, the supplier shall refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including EKE employees), government officials and any other party are in compliance with applicable anti-bribery laws and local policies.

The supplier shall also adhere to international trade regulations and export control regulations.

## **8 Confidentiality and protection of proprietary information**

EKE's intellectual property is one of its most valuable assets, which shall be protected. At the same time, the supplier shall respect the intellectual property of others.

All communications, information and / or data disclosed by EKE, whether written, visual or oral, shall be confidential. The supplier shall not disclose the confidential information of EKE to anyone, shall not use it for any other purpose than the one determined by EKE, and shall keep the confidential information in confidence with the same degree of care as is used for its own confidential information and at least with reasonable care. The supplier shall comply with the specific requirements of the applicable confidentiality / non-disclosure agreement.

The Supplier shall have the right to use EKE as a customer reference only with prior written consent.

In case the Supplier or its personnel would like to have EKE or EKE's personnel represented in their social media content, this can only be done with prior consent and by respecting one's privacy.

## **9 Quality**

EKE's systems are designed for long operative life and EKE is continuously improving its quality in order to deliver more value to its customers, improve its efficiency and make work more satisfying. The same EKE expects from its suppliers.

The supplier shall have appropriate quality management system in place. At the minimum the quality management system shall comply with latest version of the International standard ISO 9001 and/or ISO/TS 22163. EKE recommends the supplier to have third party certified quality management system.

The Supplier's manufacturing and design processes shall meet relevant railway industry standards, including but not limited to EN50155 as well as product specific standards.

## **10 Business continuity planning and security**

An uninterrupted production of components and/or services is of vital importance to EKE, as the client, as well as the supplier itself. To ensure this, the supplier shall have business continuity plan (BCP) taking into account the possible source of interruption, such as crime, pandemics, natural disasters, strikes or lock-outs or decision made by authorities. The BCP shall also include practices on mitigating identified risks and proven concepts to continue business.

The supplier shall also have appropriate, up-to-date security management system in place that has security risks identified, evaluated and managed. The Supplier shall pay special attention to possible cyber security risks, including physical security risks, data security risks as well as product security risks.