

# Code of Conduct

## The International EPD System EPD program to EPD International AB

EPD International AB operates "*The International EPD System*" and is one of the leading global program operators for type III Environmental Product Declarations (EPD) headquartered in Sweden. EPD International AB upholds various business relationships to offer third party verified EPDs as a service to its customers. EPD International AB is licensor to and operates a strategic network of independent international hubs to offer standardised EPD services on a global scale.

As one of the leading global program operators for EPDs, we at EPD International AB:

- create value through enabling our business partners and ourselves to deliver innovative, high quality and trusted verified EPD services in global and national markets;
- have sustainability at the heart of our business model and treat all our business partners and other relevant stakeholders with respect and fairness;
- develop collaborations that base on integrity/trust and fair competition principles;
- have a personal responsibility to maintain the high ethical standards inherent in working for and with EPD International AB.

### Purpose and Scope

This is the Code of Conduct (hereafter the "Code") that defines the minimum standards EPD International AB demands from its employees and all its business partners to respect and adhere to when conducting business with EPD International AB. Please read the contents of this Code carefully. This Code is an important guide for you to satisfy our high expectations on your standards of behaviour in an increasingly complex business world. When this Code is inconsistent with your national laws and regulations or internal policies and guidelines, please contact the Secretariat of EPD International AB for advice.

### Applicability

All employees and business partners to EPD International AB irrespective of function, position and location are via their undertakings with EPD International AB invariably subject to this Code. This Code is an integral part of all contracts and supplements, all current and future EPD International AB policies, guidelines, etc. The Code sets forth how EPD International AB expects to cooperate with its partners in business dealings.

### Reference to EPD International AB governance documents

EPD International AB manages a series of documents that further clarify and complement this Code. Special attention shall be paid to its general programme instructions:

- General Programme Instructions for the International EPD® System (GPI)

### Compliance

All employees and business partners to EPD International AB shall comply with all applicable laws and regulations, the requirements set out in this Code and any contractual obligations with EPD International AB. All partners to EPD International AB shall keep record of all relevant documentation and provide supporting documentation upon request. EPD International AB reserves the right to verify compliance with this Code and its reference documents through self-assessments, and internal and external assessment mechanisms. In cases of non-compliance, EPD International AB will require implementation of progresses toward its internal investigation and compliance procedures and offers support during remediation. The standards

in this Code are in addition to, and not in place of, any provisions of any legal agreement or contract between EPD International AB and its employees and business partners. In case any business relation fails to comply with this Codes content, this may result in discontinuance of employment or business relationships.

### Business Ethics

Employees and business partners to EPD International AB shall conduct their business in an ethical and fair manner, operate in full compliance with international, national and local laws and regulations that are applicable to their business operations, and obtain all the necessary permits, also in relation to the inherent activities set out in the license agreements.

They shall:

- adhere to free and fair competition and abide by relevant anti-trust and competition laws and regulations.
- comply with all anti-corruption and anti-bribery laws. They shall not engage in any form of active or passive corruption, extortion, fraud, or bribery neither with public (officials) nor private parties.
- comply with all applicable laws and regulations governing the protection, use and disclosure of proprietary, confidential, and personal information that belongs or is related to EPD International AB. In case of sub-contracting, sharing of confidential information belonging to EPD International AB should be made with the consent of EPD International AB, but EPD International AB may not unreasonably withhold any such consent.
- abstain from money laundering activities and maintain proper and accurate records (true and fair view) governing all business transactions related to EPD International AB.
- respect the applicable trade control regulations, embargoes and other restrictions and the requisite compliance mechanisms in place.

### Conflicts of Interest

- All employees and partners to EPD International AB shall always act in the best interests of EPD International AB and its customers.
- All employees and business partners shall avoid situations in which their own (direct and indirect) personal interests, financial interests, relationships, and outside activities (may) potentially conflict with the interests of the customers to EPD International AB.

Examples in which conflicts of interest (may) exist:

- Secondary employment/assignments;
- Contracting with a business managed by a close friend or family member;
- Significant financial/ownership interests in a business partner to EPD International AB, and/or a business EPD International AB has an interest in acquiring;
- Use of EPD International AB's property, labour, reputation or information in pursuit of personal (incl. political) interests.
- In case there may be/is a potential conflict of interest, EPD International AB's Secretariat shall promptly be informed (report and disclose). Next, EPD International AB will determine in a just and equitable manner whether a conflict exists, or not. To how best resolve the situation, EPD International AB transparently provides a solution.
- Existing conflicts of interest shall be resolved without detrimental consequences to EPD International AB.

### Confidentiality

EPD International AB is dedicated to protecting its own and third parties' proprietary, confidential (e.g. technical, commercial and legal) and personal information, and trade secrets.

- All business partners shall comply with all applicable laws and regulations governing the protection, use and disclosure of proprietary, confidential, and personal information, incl. the European Union's General Data Protection Regulation (GDPR<sup>1</sup>).
- Intellectual property (rights), such as patents, know-how and other third-party intellectual property is crucial to the success of customers to EPD International AB. Employees and business partners to EPD International AB shall protect and respect it in every case.
- Confidential and personal information, and business documents shall be suitably protected against unauthorised access. EPD International AB and its business partners shall adopt and uphold any customer data protection standard/guidelines where requested and relevant.
- Improper disclosure of confidential and personal information to unauthorised persons inside and outside EPD International AB is strictly prohibited.
- All confidential information EPD International AB and its business partners learn about during their employment or contracts is subject to discretion during and after business.

### Impartiality

All employees and business partners to EPD International AB shall take impartial decisions during all the verification/validation activities. Those decisions shall not:

- Allow commercial, financial or other pressures to compromise impartiality.
- Offer or provide both consultancy and validation/verification for the same claim from the same client;
- Be marketed or offered as linked with the activities of any organisation that provides consultancy;
- Provide validation/verification activities to clients who have received consultancy related to the same claim, if it poses an unacceptable threat to the impartiality. This includes potential clients with which the validation/verification body pre-engaged.

### Equity and fairness

- In all its business relationships, EPD International AB prohibits all forms of discrimination on criteria such as gender, age, religion, physical ability, national origin, sexual orientation, union membership, political affiliation, marital status, race, or colour.
- In all its business relationships, EPD International AB is committed to fully respect human rights throughout its operations, including ensuring the observance of human rights in all relationships involving EPD International AB, and encourages its partners to constantly improve their human rights performance. EPD International AB is committed, at a minimum, to uphold the principles set out in the International Bill of Human Rights and the International Labor Organization's core conventions.

### Responsibilities and Consequences of Infringements of this Code

- Compliance with this Code is the responsibility of each employee and business partner to EPD International AB.
- EPD International AB is dedicated to building an open working environment and ethical culture that is based on trust and not on sanctions.
- EPD International AB will investigate allegations of misconduct, including violations of this Code. EPD International AB will not hesitate to take adequate and reasonable measures (disciplinary and corrective actions) to ensure the proper implementation of and compliance with this Code.
- EPD International AB does not permit any measures against anyone who in good faith raises issues, concerns, allegations of compliance, violations or unethical conduct.

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<sup>1</sup> The General Data Protection Regulation (2016/679) is a regulation in EU law on data protection and privacy for all individual citizens of the European Union and the European Economic Area. The GDPR also regulates the transfer of personal data outside the EU and EEA areas.

### Consultation, Grievance Mechanisms and Access to Remedy

EPD International AB provides a company-based grievance mechanism for effective remedy to its internal and external partners and stakeholders. In the context of our relationship, if there is any believe that the terms of this Code of Conduct are not adhered to by its partners, or that EPD International AB acts in conflict with it itself, then EPD International AB encourages you to raise your concerns or report incidents via EPD International's reporting channel without retribution. All reported incidents are processed, investigated and followed-up (where appropriate) within a determined time frame.

Please visit [www.environdec.com](http://www.environdec.com) to learn more about your reporting options or contact us:

International EPD System

Email: [support@environdec.com](mailto:support@environdec.com)

### Declaration of Consent

At the request of EPD International AB, I undertake the obligations contained in this Code of Conduct.

Name in capitals.....

Signature.....

Position.....

Date.....