

/ Supplier CODE OF CONDUCT

INTRODUCTION

Willo is committed to high standards of business ethics and sustainability. This code of conduct is based on the United Nation Global Compact (UNGC) and the eight fundamental International Labour Organisation (ILO) conventions. We encourage our suppliers to establish their own codes of conduct based on similar standards and to flow down these standards to all persons and entities supplying goods or services to Willo. We also expect that our suppliers will, upon receiving reasonable notice, give Willo access to relevant premises and documentation to verify compliance with the Supplier Code of Conduct. If a supplier fails to meet our expectations as set out in the Supplier Code of Conduct, Willo's general approach is to encourage improvement. Critical deviations or repeated unwillingness to make improvement, however, may jeopardize the supplier's relationship with Willo.

LEGAL COMPLIANCE

The supplier must operate in full compliance with laws and regulations applicable to its business.

LABOUR STANDARDS

No use of forced labour

The supplier must not engage in or support the use of forced labour. The supplier must not engage in or tolerate the use of corporal punishment, mental or physical coercion or abuse.

Minimum age requirements

The supplier must not engage in, or benefit from, the use of child labour, in accordance with the ILO convention 138.

Non-discrimination

Willo expects the supplier to make decisions on hiring, promotion, development and compensation based on the employees' abilities and skills related to the job. These decisions must never be based on irrelevant factors such as gender, age, ethnic or national origin, religion, disability, sexual orientation, union membership or political affiliation.

Freedom of association and collective bargaining

Willo expects the supplier to respect the right of employees to freely associate and bargain collectively.

Wages and working hours

Willo expects the supplier to compensate employees fairly and, as a minimum, to comply with legal minimum standards. Working hours shall comply with national laws.

Health and safety standards

Willo expects the supplier to ensure that its employees are offered a safe and healthy working environment. Adequate health and safety policies and procedures shall be established and followed.

ENVIRONMENT

Willo expects the supplier to contribute to sustainable development and to strive to reduce the negative environmental impact of its activities, products and services through a proactive approach and responsible management. This means that the supplier shall continuously work to minimise the environmental risks and, the use and emission of hazardous substances, and promote resource-efficient solutions.

BUSINESS ETHICS

Anti-corruption

The supplier must refrain from all forms of corruption, extortion and bribery, and specifically ensure that all payments or other benefits offered or made to public officials, private sector employees or any other party comply with applicable anti-corruption laws and regulations.

Business courtesies

Willo expects the supplier to compete on the merits of its products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, the supplier must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulations, does not violate the rules or standards of the recipient's organisation, and is consistent with reasonable marketplace customs.

Information protection

Willo expects the supplier to properly handle sensitive information, including confidential, proprietary and personal information. Information should not be used for any other purpose than for which it was provided. The supplier must respect the intellectual property of Willo and others.

Conflict minerals

Willo expects the supplier, where applicable, to exercise reasonable due diligence concerning its use of conflict minerals and the source of these minerals and to respond in a timely manner to Willo's request for information on these activities and findings.



Marcus Johansson, Managing Director
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