



Supplier Code of Conduct - 2025

Agenda

- Linxon values
- Adherence to the code
- Speaking up
- Avoiding conflicts of interest
- Appropriate business practices
- Corporate social responsibility
- Confidential information and data privacy
- Reporting suspected misconduct and concerns

Linxon core values



Trust

We care for the wellbeing of each other – physically and mentally.

We act ethically and keep our commitments.

Our customers can rely on us.



Entrepreneurship

We create value in everything we do.

We act with a **strong sense of ownership** for the result.

We are curious and find **innovative solutions**.

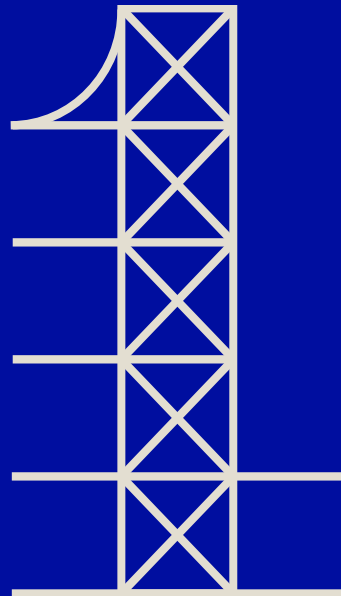


Collaboration

We value the opinion of other and create a spirit of teamwork and openness.

We learn from each other's different perspectives for the better outcome.

We help and support each other.



Principles of ethical standards

Adherence to the code

→ Culture of integrity

→ Linxon emphasizes integrity and high ethical standards across all business operations and partnerships.

→ Supplier code compliance

→ All suppliers and their representatives must adhere strictly to Linxon's Supplier Code of Conduct principles.

→ Training and awareness

→ Suppliers must educate their employees about the Supplier Code to ensure understanding and compliance.

→ Written confirmation

→ Suppliers are required to provide written confirmation of their commitment to uphold the Code's principles.

Speaking up – Reporting concerns

- **Importance of speaking up**
 - Everyone plays a role in upholding ethical standards by reporting integrity or misconduct concerns promptly.

- **Supplier responsibility**
 - Suppliers are encouraged to uphold the same ethical standards and report any integrity issues they observe.

- **Clear reporting process**
 - A defined reporting procedure is provided in the Supplier Code of Conduct to guide responsible disclosures.

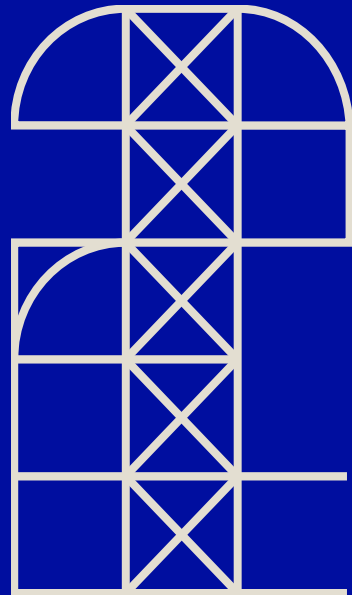
Conflicts of interest – Supplier obligations

- **Act in Linxon's best interest**
 - Suppliers must always prioritize Linxon's interests in all dealings and decisions to maintain trust and integrity.

- **Disclose conflicts early**
 - Suppliers must disclose any actual, potential, or perceived conflicts of interest in writing before starting business relations.

- **Ongoing conflict disclosure**
 - Suppliers should promptly inform Linxon of any conflicts arising during the business relationship to ensure transparency.

- **Avoid undisclosed conflicts**
 - Suppliers must avoid any conflicts of interest that are not properly disclosed and mitigated to uphold ethical standards.



Appropriate business practices

Legal compliance

- **Legal compliance**
 - Suppliers must comply with all relevant laws including corruption, bribery, and tax evasion regulations.
- **Ethical business practices**
 - Business practices must avoid activities that risk penalties or cause regulatory breaches for Linxon.
- **Health, safety, and environment**
 - Suppliers must adhere to health, safety, and environmental laws to maintain responsible operations.

Anti-trust and competition

- **Principles of fair competition**
 - Antitrust laws ensure suppliers engage in honest and fair competition upholding the integrity of the marketplace.
- **Prohibited anti-competitive actions**
 - Suppliers must avoid price fixing, market division, bid rigging, and sharing confidential competitor information.
- **Compliance with legislation**
 - Adhering to antitrust and competition laws is mandatory for suppliers to maintain lawful business operations.

Anti-bribery and corruption standards

- **Prohibition of bribery**
 - Suppliers must never engage in bribery or offer benefits to gain unfair business advantages.

- **Compliance with laws**
 - Suppliers are required to comply with international anti-bribery laws including OECD and UK Bribery Act.

- **Avoiding unfair advantage**
 - Avoid actions like gifts or payments aimed to improperly influence third parties or retain business.

Gifts, hospitality and facilitation payments

- **Prohibition of facilitation payments**
 - Suppliers are strictly prohibited from making facilitation payments, regardless of local laws or indirect relationships.

- **Principles for gifts and hospitality**
 - Suppliers must ensure gifts and hospitality comply with laws, are authorized, reasonable, honest, and transparent.

- **Forbidden practices**
 - Suppliers must never accept or offer illegal, indecent, or cash benefits, nor create conflicts of interest.

Government officials

- **Transparency requirement**
 - Suppliers must provide full transparency about relationships with government officials to assess and manage risks.

- **Disclosure obligations**
 - Suppliers must disclose any owners, directors, or employees connected to government officials at relationship start and promptly thereafter.

- **Risk management**
 - Managing potential impropriety risks requires prompt disclosure and knowledge of any close personal or business ties to officials.

Money laundering and tax evasion

- **Anti-money laundering compliance**
 - Suppliers must comply with laws and regulations to prevent money laundering and criminal activity involvement.

- **Tax evasion: Zero tolerance**
 - Suppliers must enforce zero tolerance for facilitating tax evasion and adhere strictly to tax regulations.

- **Monitoring suspicious activity**
 - Recognizing and monitoring warning signals helps detect unusual or suspicious financial activities early.

Trade compliance

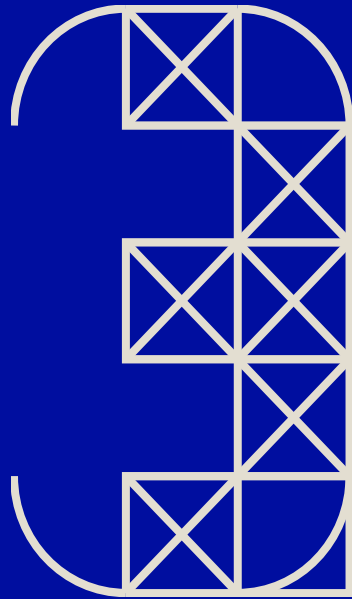
- **Export controls compliance**
 - Suppliers must comply with local and international export controls and economic sanctions in all jurisdictions they operate in.
- **Anti-boycott laws**
 - Avoid contractual clauses that would illegally boycott trade with any country to maintain lawful business practices.

Accounting practices

- **Maintain accurate records**
 - Suppliers must keep complete and accurate books and documents following accepted record-keeping standards.

- **Audit access rights**
 - Suppliers must allow audits and provide access to relevant books and documents upon reasonable notice.

- **Access duration requirement**
 - Audit access must be granted during the contract and for six years after its end or expiration



Corporate social responsibility

Human rights and modern slavery

- **Respect for human rights**
 - Linxon ensures dignity, fairness, and respect for all employees across its operations.

- **Zero tolerance for abuse**
 - Suppliers must avoid any activities encouraging human rights abuses or modern slavery regardless of local laws.

- **Employee freedom and training**
 - Employees are free to leave with notice and receive training on recognizing modern slavery risks.

- **Supply chain responsibility**
 - Suppliers must ensure their own supply chains are free from any form of modern slavery.

Diversity and inclusion

- **Respectful work environment**
 - Maintaining a workplace free from discrimination, harassment, and violence is essential for mutual respect.
- **Diversity and inclusivity support**
 - Encouraging and supporting diversity and inclusivity helps create a welcoming workplace culture.
- **Promoting equality**
 - Taking proactive measures to eliminate discrimination fosters equality in the workplace.
- **Collaborative improvement**
 - Working together with partners to enhance equality, diversity, and inclusion benefits all stakeholders.

Health, safety and environment

- **Compliance with safety laws**
 - Suppliers must treat workplace health, safety, and environmental laws as the minimum standard everywhere they operate.

- **Protecting people**
 - Protect everyone involved in operations, including personnel and visitors to work sites and offices.

- **Hazard management**
 - Focus on recognizing hazards, assessing risks, and eliminating dangers to ensure a safe environment.

- **Environmental care**
 - Conduct operations responsibly with care for the environment to promote sustainable practices.

Confidential information and data privacy



Suppliers must protect confidential information from unauthorized access to safeguard business interests and privacy.



Written consent is required before accessing confidential data, and access should be limited to essential personnel only.



Personal information must be protected in line with relevant data protection and privacy laws to ensure compliance.

Reporting suspected misconduct



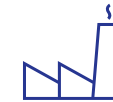
Suppliers must immediately report any evidence or suspicion of misconduct related to Linxon business.



Reports can be made through Linxon contacts or a secure third-party reporting line to ensure confidentiality.



Suppliers must fully cooperate with investigations, providing access to records and personnel as needed.



Linxon prohibits retaliation and fosters a safe environment for reporting concerns in good faith

Acknowledgement

- Kindly review and acknowledge your agreement to our Supplier Code of Conduct through this [link](#).

linxon