

February 01, 2022

CueDee Supplier Code of Conduct

Introduction/Purpose

This Code of Conduct (CoC) has been developed for the purpose of protecting human rights, promoting fair employment conditions, safe working conditions, responsible management of environmental issues and ethical standards.

In addition to compliance with all relevant laws, regulations, and standards in relevant countries CueDee requires partners and suppliers and their subcontractors to comply with the Code of Conduct, or relevant standards with higher demands, when doing business with CueDee.

CueDee, or representative of CueDee, shall at any time be granted access to partner, supplier or sub-supplier's premises and requested documentation shall be presented within reasonable time by partner, supplier/sub-contractors.

Partners and suppliers are expected to be familiar/well educated and meet requirements under national legislation, regulations and industry standards.

Materials, intellectual property and resources of CueDee shall be used for CueDee's interests and benefits, it's value protected and used with caution. Intellectual property includes patents and other copyrighted materials, knowhow and trade secrets, brands and trademarks. Respect and protect CueDee's confidential information and trade secrets from unauthorized disclosure and misuse, and do not share with third parties except under approved terms which restrict their disclosure and use.

It is your responsibility as a partner or supplier to ensure that your employees and your subcontractors are complying with CoC.

The responsibility for the partner or supplier lies beyond these statements which only serve as a brief guideline for understanding CoC. Any partner or supplier should be prepared to comment on these statements.

All communications are always professional, respectful, and free from bias.

Partner and supplier shall ensure that there are adequate management systems and controls in place to ensure compliance with the CueDee CoC

As a partner as well as supplier you are parts of building the good reputation of CueDee and you must take care not to cause harm to it. If there is uncertainty regarding the CueDee CoC, it's the partners and suppliers' responsibility to ask CueDee for guidance and clarification.

Anti-corruption

We have a strict zero tolerance policy on any form of corruption or financial irregularity.

The highest standards of business integrity are to be expected in all business interactions. Any and all forms of corruption, bribes, extortion, fraud or unfair methods of competition are strictly prohibited. CueDee is committed to complying with applicable anti-money laundering and terrorist financing laws and regulations.

CueDee complies with the Swedish Business Code issued by the Swedish Institute Against Bribes (IMM) which aims to guide companies in questions of how gifts, remuneration and other benefits may be used in the business sector to promote the company's operations.

All financial transactions e.g. purchases, sales, or other, concerning CueDee products, services and similar, shall take place in accordance with the relevant laws and regulations in each country.

No improper payments or other remuneration to any person or organization for the purpose of establishing or retaining business relationships is allowed.

Partners and suppliers shall maintain neutrality in relation to political parties and candidates.

If a conflict of interest arises in situations where the partner, supplier or an employee has competing professional or personal interests, making it difficult to fulfill duties impartially, CueDee management must be notified immediately.

Health and safety

Work environment and work situation that prevents physical and mental ill health shall be ensured, prioritized and continuously improved by the Employer.

All employees should be given appropriate health and safety education and fire training as well as training in handling chemicals, if used. Such training shall be done on regular basis.

Where and what type of Personal Protective Equipment (PPE) your employees need for their safe work shall be identified and, if required appropriate training shall be given. PPE, as well as required training, shall always be free of charge for the employees.

Fair employment

Partners and suppliers are obliged to inform their employees about the conditions of their employment, and any updates thereof. Employees in their turn should have access to this information in a language understandable to them.

Pay and terms shall be fair and reasonable and comply with applicable laws or industry standards. Working hours shall comply with applicable laws. Equal pay for equal work must be promoted by partners and suppliers of CueDee.

All kinds of discrimination based on partiality or prejudice is prohibited such as discrimination based on race, colour, gender, sexual orientation, gender identity, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, indigenous status, disability, age, union membership or employee representation and any other characteristic protected by local law, as applicable.

Working conditions

Employees shall not be required to lodge deposits of money, identity papers or other personal documents and similar with their employer. Neither commit to work for the employer for an unreasonable period of time due to personal training or other personal benefits. The relationship with and between employees should be based on mutual respect and equality and allow reasonable influence in areas that impact the individual's work situation.

Employees should have the freedom to exercise their legal right to be a member of, organize, or work for organisations that represent their interests as employees. The respect and equality of employees shall be present in every aspect of employment – recruitment, hiring, compensation, job assignments, and promotion.

Employees must not be required to pay any recruitment fees or other aggregable fees to obtain their employment. Deduction from wages as a disciplinary measure shall not be permitted.

CueDee does not tolerate in any context the use of child labour, forced labour, human trafficking, involuntary or unpaid work or modern-day slavery and exploitation in our operations or in any part of our supply chain.

The UN's convention on the Rights of the Child, the ILO's Convention on the Minimum Age for Employment, and the Convention on Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, are guidelines for all business activities that are conducted at CueDee; -partners and -suppliers.

Environment

CueDee; -partners and -suppliers meet or exceeds the legal requirements for protecting the environment. Recycling considerations and economizing on natural resources are an important basis of operations. The environmental perspective should be part of every important decision in your operational work. CueDee; -partners and -suppliers does not unlawfully or improperly use or exploit natural resources.

You as a partner or supplier should identify the areas in which you have a major environmental impact, your "significant environmental aspects". You should have a process to identify, prioritize and mitigate the significant environmental risks and other aspects associated with your operations and activities.

Partners and suppliers are expected to be familiar with and meet or exceed requirements under national legislation, regulations and industry standards. As a minimum requirement, partners and suppliers, should ensure safe handling of hazardous substances and waste.

Reach, RoHS & Conflict Minerals Compliance

CueDee expects its partners and suppliers to, at any time, fulfill the latest obligations according to REACH, RoHS and Conflict Minerals regulations and directives.

Audits

Your company's compliance to the Code of Conduct requirements may be verified in several ways: through assessments and audit on site or through questionnaires and self-assessments.

Upon request, a partner or supplier must provide requested information and/or allowing access to premises for CueDee appointed representatives.

Reporting

Reports of violations of this Code of Conduct may be submitted anonymously and confidentially to info@cuedee.se or via post to CueDee AB, Sikea 58, SE-91593 Robertsfors. No penalty or other negative consequences shall apply to persons who submit a report in good faith.

Partners and suppliers of CueDee are also responsible to inform CueDee of any actual or potential contradictions between this Code of Conduct and applicable laws and regulations.