

# Code of Conduct for Business Relationships

**aeven**

Adaptive digital infrastructure

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# Aeven's Code of Conduct for Business Relationships

## 1. Introduction

### Purpose

The purpose of Aeven's Code of Conduct for Business Relationships (CoCBBR) is to outline Aeven's standards and expectations towards Business Relationships (BRs), including suppliers, and ensure responsible business conduct across Aeven's value chain. Aeven has implemented the standards outlined in this CoCBBR and is prepared to share any related information or documentation with our BRs.

Aeven's Responsibility Policy (available on [www.aevengroup.com](http://www.aevengroup.com)) outlines Aeven's commitment to respect human rights, environmental, and economic sustainability, which is also embedded in the way Aeven works with its BRs.

In Aeven, we are committed to contribute positively to the societies we operate in. When it comes to the things that matter most—our wellbeing, our society, and our planet—there are no competitors. Therefore, we are committed to collaborating with our business relationships to drive meaningful change through specific actions.

Our role as a trusted partner to many Danish companies and public institutions comes with the responsibility to set high standards in sustainable efforts. We recognize the leverage we have to influence positive outcomes. This is why we're committed to being a leader in the changes we want to see.

### Scope

The standards and expectations, expressed in this CoCBBR, are based on the internationally agreed minimum standard for responsible business conduct: The [UN Guiding Principles on Business and Human Rights](#) (UNGPs), and the [OECD Guidelines for Multinational Enterprises](#) (OECD). They address all key areas of sustainable development: Human rights (including labor rights), environment (including climate), and economic sustainability (including anti-corruption, anti-trust, and tax).

Aeven expects its BRs to implement and maintain a management system that is fully aligned with the globally agreed minimum standard (UNGPs/OECD). If an equivalent framework has been implemented, the BR is to inform Aeven.

Should BRs not have implemented a management system in alignment with the UNGPs/OECD standards at the time of receiving this CoCBBR, an implementation plan should be developed and presented to Aeven upon request. Aeven expects BRs at any time to be able to declare their stage of implementation in relation to the requirements outlined in this CoCBBR.

The management system shall, at a minimum address:

- Adverse impacts on the human rights stated in the International Bill of Human Rights, including the core labor rights from the International Labour Organization's Declaration on Fundamental Principles and Rights at Work

- Significant adverse impacts on the environment in relation to the areas addressed by the Rio Declaration on Environment and Development, including the climate as reflected in the Paris Agreement
- Significant risks of adverse impacts on anti-corruption, as related to the scope outlined by the United Nations Convention against Corruption

For Aeven's full impact assessment, please refer to our [grievance mechanism](#).

If Aeven's BR causes, contributes to, or is linked to severe impacts on human rights, the environment, or anti-corruption, the BR shall notify Aeven immediately at [Responsibility@aevengroup.com](mailto:Responsibility@aevengroup.com). The notification shall include actions to end the severe impacts and to prevent or mitigate re-occurrence.

Aeven encourages our BRs to inform us immediately at [Responsibility@aevengroup.com](mailto:Responsibility@aevengroup.com), should BRs find that we contribute to adverse impacts that BRs experience, or contribute to with us.

The policy is a minimum standard, applicable to all Aeven's employees, organizational units, and services as well as our Business Relationships, including Suppliers.

## 2. General compliance with laws and regulations

Aeven's Business Relationships, including suppliers, must comply with all applicable laws and regulations in all countries where they conduct business as well as to the standards specified in this document.

This also includes the following laws and regulations:

### Competition law

Aeven's BRs must comply with and adhere to international and local competition law and regulations. Aeven does not accept to neither directly or indirectly support violation or circumvention of competition law and requires that Aeven's BRs do not accept it either.

### Export Control

Aeven's BRs must adhere to and comply with any export control restrictions and regulations.

### Privacy

Aeven requires its BRs to comply with international and local law regarding the processing and handling of personal data that pertains to Aeven or Aeven's deliveries and/or services.

### Responsibility and transparency

Aeven requires its BRs to comply with the EU regulations regarding disclosure of non-financial information. This includes the EU Taxonomy Regulation, its affiliated Delegated Acts, and the Corporate Responsibility Disclosure Regulation (CSRD). Upon request, BRs shall deliver data for Aeven's CSRD reporting. BRs that are not directly covered by CSRD requirements are expected and encouraged to develop and implement relevant processes, appropriate for a company of their size and industry, to provide the ESG data requested by Aeven.

### Labor

Aeven requires its BRs to comply with national or international labor regulations, whichever presents the most favorable terms for local labor.

## 3. Environment

Aeven's BRs, including suppliers, must engage in, and together with Aeven, ensuring that their operations minimize adverse impact on the environment.

Aeven requires its BRs to as minimum comply with all applicable environmental laws and regulations in the country of operation, and in so doing obtain and maintain the necessary registrations, permits and licenses.

### Due Diligence

Aeven expects its BRs to proactively develop, plan and supply its deliveries to Aeven whilst regularly assessing their risks of significant adverse impacts on the external environment in relation to the areas addressed by the Rio Declaration on Environment and Development, including the climate as reflected in the Paris Agreement. BRs shall identify risks of impact, act to prevent or mitigate both the adverse impacts identified, and measure and track effectiveness of such actions.

Furthermore, Aeven's BRs are required to invest or actively engage, as applicable, in activities with the purpose of

- a. identifying, measuring and/or reporting on greenhouse gas emissions in line with the GHG Protocol,
- b. setting or commit to setting targets for reducing GHG emissions,
- c. converting energy use to renewable energy to the extent possible within the local context,
- d. minimizing energy use, and
- e. transforming operations and activities to the extent possible to comply with criteria laid out in EU directives regarding non-financial activities and information.

## 4. Human Rights

Aeven's BRs must support and respect the protection of internationally proclaimed human rights stated in the International Bill of Human Rights, including the core labor rights from the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

### Human Rights Due Diligence

In accordance with the minimum standard for responsible business conduct (UNGPs/OECD), they must establish an appropriate due diligence process to identify, prevent, mitigate, and account for actual and potential risks of adverse impacts on all human rights as well as provide access to remedy to affected stakeholders.

Risks of adverse impacts on human rights include, but are not limited to (for extensive list of human rights, please refer to the standard mentioned above):

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**Right to non-discrimination**

**Right to safe and healthy working conditions**

**Right to rest, leisure, and paid holidays**

**Right to a living wage and social security, including social insurance**

**Right to children's and young people's protection from exploitation (no child labor)**

**Right not to be subjected to slavery, servitude or forced labor**

**Right to form and join trade unions and the right to strike**

**Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment**

**Right to self-determination (indigenous peoples rights)**

**Right to privacy**

**Right to freedom of information**

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For further description of these areas, please refer to the UNGP/OECD minimum standards on Human Rights.

## 5. Governance and Economic Sustainability

Aeven's BRs shall act with integrity while conducting business and inform Aeven of any significant impact in the value chain and report any non-compliances with this Code of Conduct to Aeven.

### Due Diligence

Aeven expects its BRs to regularly assess their risks of significant adverse impacts on areas of economic sustainability. In accordance with the minimum standard for responsible business conduct (UNGPs/OECD), BRs shall identify risks of impact, act to prevent or mitigate both the adverse impacts identified, and measure and track effectiveness of such actions.

### Business integrity

BRs shall comply with all laws and regulations on bribery, fraud, corruption, and prohibited business practices applicable in the specific country. BRs shall not engage in any form of bribery, facilitation payments, corruption, extortion, or embezzlement. BRs shall not give or receive bribes — including indirect bribes made through intermediaries and third parties — to obtain undue or improper advantage.

BRs shall also refrain from offering donations, grants, expensive gifts, and extravagant entertainment to Aeven's employees or other counterparts in Aeven to influence business decisions.

### Minerals from conflict-affected and high-risk areas

Aeven is committed to eliminating conflict minerals within its supply chain. BRs that supply products or parts hereof that contain metals or minerals (Minerals) must comply with OECD's "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas".

Aeven requires its BRs to exclusively source minerals from certifiable conflict free areas if sourcing from the Democratic Republic of Congo.

### Management system for responsible business conduct

BRs are expected to implement governance structures appropriate to their business in terms of company size and impact on human rights, environmental and economic sustainability, including

- a. a policy, approved by the most senior level of the company, representing the BR's commitment to respect all key areas of sustainable development,
- b. a process for regular assessments of risks of actual and potential adverse sustainability impacts, and
- c. remediation of identified and actual adverse sustainability impacts.

### Operational Level Grievance Mechanism

Where the Business Relation identifies that it causes or contributes to actual severe adverse impacts on the principles, the business relationship must, in accordance with the UN Guiding Principles on Business and Human Rights, provide access to remedy through legitimate processes (grievance mechanisms) for



those affected. Notification of relevant authorities may also be necessary regarding significant impacts in the environmental and economic areas. BRs must document consultations with those affected and all actions taken to address grievances.

### Whistleblower program

Subject to Danish act no. 1436 of June 24, 2021, on Whistleblowing, BRs must establish anonymized and secure whistleblower programs to ensure safe and reliable systems and ensure the protection of whistleblowers.

## 6. Sub-suppliers

Aeven requires its BRs to inform their own suppliers of products and services to Aeven of the above-mentioned standards and to ensure that the sub-suppliers comply with these standards.

BRs are required to report any potential or actual risks of non-compliant practices on the part of sub-suppliers to Aeven.

Upon request, BRs shall inform Aeven of all sub-suppliers that are used in deliveries of products and services to Aeven.

## 7. Documentation

Aeven's BRs must, upon request, provide Aeven with information and documentation regarding their compliance with this Code of Conduct for Business Relationships.

Appropriate records include:

- Policy Statement(s)
- Documentation of due diligence processes, including operational-level impact assessments
- Transparent records on tracking effectiveness of actions, documented grievance mechanisms, and requirements to BR
- Enhanced due diligence is expected from larger BRs and from BRs working with dangerous products and/or services, and/or in pre-, in-, or post-conflict areas.