

TITLE Supplier Code of Conduct		CONFIDENTIALITY PUBLIC	DOCUMENT ID DOCID-1277143338-94
PRODUCT Policies	PROCESS Group Compliance	RESPONSIBLE FUNCTION Group CEO	VERSION 2.0
DOCUMENT TYPE Policy - Group Compliance		DOCUMENT OWNER Liselott Lindberg	PUBLISHED IN RELEASE [Published In Release]

# SUPPLIER CODE OF CONDUCT

ISSUER ROLE Issuer	SIGNATURE Liselott Lindberg	DATE 2022-04-07 10:17:00	VERSION 1.3
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## 1 INTRODUCTION

Cambio is committed to conduct its business in an ethical and responsible manner. Ensuring high level of ethical, environmental, and quality operations is therefore a top priority. Cambio works hard to ensure that human rights are respected and operations are environmentally sustainable throughout our supply chain. Conducting business in the right way is Cambio's way of doing business according to our values. There is no right way to do the wrong thing.

Cambio's products and services must meet strict requirements on functionality and safety. To ensure business success and that Cambio continues to be a trusted partner to its stakeholders Cambio will only work with respected and responsible business partners. Meeting and exceeding these standards are of vital importance to Cambio's business.

## 2 APPLICATION

This Supplier Code of Conduct (the "SCOC" or this "Code") helps to translate Cambio's values into action by outlining the non-negotiable minimum standards which Cambio requires its suppliers (the Supplier(s)) to comply with when doing business with Cambio.

This SCOC illustrates the values and principles that are core for Cambio's operations worldwide. References to Cambio throughout this Code cover Cambio Corporation and all its subsidiaries and associate companies worldwide ("Cambio"). Cambio supposes its business partners to share the same values and high ethical standard.

## 3 IMPLEMENTATION

All suppliers to Cambio shall review and sign this SCOC. It is a prerequisite for the Supplier to commit in all their activities to operate in a full compliance with the laws, rules, and regulations of the countries in which they operate.

Cambio expects that its suppliers comply with this Code of Conduct and that they do their utmost to live up to its requirements within their organisations and in their supply chain. This is expected to take place through dialogue, transparency and open cooperation benefitting both parties.

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The Supplier shall adopt or establish relevant management systems to ensure 1) compliance with applicable laws and regulations, and 2) conformance with this Cambio Supplier Code of Conduct.

The Supplier must also adopt similar requirements for its suppliers and monitor its supply chain. The obligations concern all operations connected to the performance of the contract, both within the supplier's own operations and in its supply chain. By mirroring the requirements, the Supplier shall ensure that the fundamental terms are fulfilled by hired subcontractors in all parts of the Supplier chain. In addition, the Supplier shall ensure that these subcontractors participate in the follow-up audits during the contract period.

## 4 COMPLIANCE WITH LAWS

The SCOC describes Cambio' commitment to international conventions, national legislation, and applicable industry rules. Any goods or services shall be produced and delivered to Cambio in accordance with the following fundamental terms regarding sustainable supply chains ("Fundamental Terms"):

### 4.1 International Declarations and Conventions

- The United Nations Universal Declaration of Human Rights (1948)
- The Eight Fundamental Conventions of the International Labour Organisation (ILO) regarding forced labour, child labour, discrimination, freedom of association and collective bargaining (no. 29, 87, 98, 100, 105, 111, 138 and 182)
- The United Nations Convention on the Rights of the Child, Article 32
- The United Nations Convention against Corruption

### 4.2 National legislation

- Labour protection and work environment legislation in force in the country where the goods are produced or work is performed
- Labour law, including regulations on salary, minimum wages, and social welfare protection in force in the country where the goods are produced or work is performed
- Environmental protection legislation that is in force in the country where the goods are produced or work is performed

### 4.3 Industry rules, as applicable.

- Industry rules, as applicable, which regulate all aspects of the industry's relationship with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs), to ensure that all interactions are ethical and professional at all times and to maintain the trust of regulators and patients.

Where there is a difference between national legislation, international declarations and conventions and applicable industry rules, the regulations with the stronger protection for the individual shall apply.

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The obligations concern all operations connected to the performance of the contract, both within the supplier's own operations and in its supply chain.

By mirroring the above listed Fundamental Terms, the Supplier shall ensure that these Fundamental Terms are fulfilled by hired subcontractors in all parts of its supply chain. In addition, the Supplier shall ensure that these subcontractors participate in follow-up audits during the contract period.

## 5 AUDITS AND SELF-ASSESSMENTS

The Supplier shall cooperate with Cambio's compliance efforts.

Upon request from Cambio the Supplier shall, within four (4) weeks from the receipt of the request or another time period specified by Cambio, report in writing on their compliance with the fundamental terms and how the Supplier forward the requirements in their supply chain.

In order to assess compliance with the SCOC, Cambio may visit, or let external monitors visit, the Supplier's facilities, with or without notice. For monitoring compliance Cambio uses a comprehensive audit checklist, against which the corporate responsibility performance is verified and benchmarked. Violations of the SCOC may result in immediate termination of collaboration, and also in legal action.

The Supplier shall arrange periodic self-assessments. There shall be a process for correction of responsibility deficiencies identified in audits, assessments, and inspections. The Supplier is expected to share accurate and complete information with the auditors. Falsification of data or withholding information about working conditions, labour practices, production process, environmental management, products, or materials or such is a serious violation to the SCOC.

## 6 LABOUR AND HUMAN RIGHTS

Supporting and respecting the protection of internationally proclaimed human rights as defined in the United Nations Universal Declaration of Human Rights, including freedom of thought, opinion, expression, religion and to peaceful assembly, protecting Supplier's employees; threats, harassments, intimidation, and violence in the workplace will not be tolerated. Not allowing working conditions or treatment that contravene basic human rights and violate our zero tolerance for child labour, or are in conflict with laws and practices of relevant countries where these require a higher standard.

## 7 DIVERSITY AND INCLUSION

Equal opportunity in all employment practices, policies and rules as well as treating all employees fairly and impartially based on competence, experience, and performance, without regard to race, ethnicity, age, disability, gender, religion or sexual orientation or any other characteristics protected by applicable law

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## 8 HEALTH AND SAFETY

Ensuring high standards of Health and Safety management throughout all its operations. Supplier shall take appropriate measures to prevent workplace accidents and work-related illnesses.

## 9 ENVIRONMENT

Suppliers shall conduct their operations responsibly in relation to the environment and comply with local and national environmental legislation. The Supplier's environmental management system shall be equivalent to the requirements in the ISO14001 or Eco-Management and Audit Scheme (EMAS). Through a structured and systematic approach and the identification, measurement and follow-up of its environmental impact, the supplier shall aim to continually improve its environmental performance and minimize the use of resources and the production of waste. The supplier shall aim towards employing a life-cycle perspective concerning environmental impact from products and services and shall place environmental requirements on subcontractors. The Supplier shall be able to provide evidence of compliance.

## 10 BUSINESS ETHICS AND INTEGRITY

### 10.1 Fair dealing

Supplier must not seek competitive advantages through illegal or unethical business practices. All Supplier's employees are expected to deal fairly with others. No one should take unfair advantage of another through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

### 10.2 Free and open competition

Cambio embraces free and open competition. Competition law aims to protect free competition in the market, by regulating the relationships with business partners and competitors. Although there is no one uniform set of competition laws that apply in all countries, certain basic principles apply everywhere to prohibit collusive or unfair business behaviour that restricts free competition.

### 10.3 Anti-bribery and corruption

Corruption is the abuse of entrusted power for private gain. It is considered to be one of the biggest threats to market and social development. Corruption disrupts competitive markets, misallocates resources, and can lead to violation of human rights. It undermines the rule of law and trust in business and its leaders. It is Supplier's responsibility as a company and its employees' responsibility as individuals who represent the Supplier, to prevent corruption in all its forms, including bribery, facilitation payments and inappropriate gifts, hospitality, and favours.

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## 10.4 Export and import controls

The Supplier is responsible for screening and tracking local and global export/import controls and economic sanctions.

## 11 PROTECTING CAMBIO'S PHYSICAL PROPERTY, INTELLECTUAL PROPERTY RIGHTS AND DATA

Cambio's Suppliers shall respect and protect Cambio's physical property, intellectual property, and confidential information, and comply with all applicable privacy and data protection laws, rules, and regulation.

Cambio' owns and utilizes many types of intellectual property rights, including but not limited to copyrights, patents, trademarks, know-how and trade secrets ("IPRs"). Some IPRs are protected via registration, some not. Cambio's IPRs and data belong to the most valuable assets of Cambio. The Supplier shall manage and transfer IPRs and data in a manner that protects such IPRs and data.

Suppliers shall understand their role as custodians of Cambio's and its customers' information, data, and intellectual property rights. Any and all ownership of IPRs and data shall be respected and protected, and all use thereof shall be conducted in a manner which safeguards and not endangers the ownership and confidentiality of any IPRs, data and proprietary information belonging to Cambio, Cambio's customers and/or any third party.