



**æeven**

**Responsible  
Sourcing  
Standards**

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# 1 Aeven's Responsible Sourcing Standards

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## 1.1 Introduction

The purpose of Aeven's Responsible Sourcing Standards is to outline the collaborative approach in Aeven's relations to suppliers and to ensure responsible and sustainable business conducts.

Aeven's Corporate Responsibility Policy outlines Aeven's general approach to working with responsibility and sustainability, and this is also imbedded in the way Aeven works with its suppliers.

To Aeven, putting good IT into practice for customers also means making a more positive mark on society. Aeven believes that digital transformation plays a crucial role in the green transition of the global society.

However, at the same time, the IT industry is a large contributor when it comes to CO<sub>2</sub> emissions. As a conscience-driven player in the IT industry, Aeven wishes to show how IT and digitization can lead to a more sustainable future. And Aeven wishes to enable a dialogue — leading to action — with its stakeholders about the sustainable digital transformation. Aeven's suppliers constitute important stakeholders in this endeavor.

Aeven relies on the conceptualizations of responsibility and sustainability provided by the United Nations (UN) Global Compact, the Sustainable Development Goals, the EU Taxonomy and the ESG principles. Aeven believes in the need for an honest, collaborative, and explorative dialogue with suppliers to facilitate real change. Aeven does not claim to hold all the answers to transforming its value chain. Instead, Aeven will find these solutions together with its suppliers to better ensure the realizability and mutual engagement in transforming their businesses together.

Aeven views the standards expressed herein as an integral part of Aeven's business relationship with its suppliers and Aeven expects its suppliers to share its fundamental principles and obligations to ensure responsible and sustainable conduct.

Aeven's Responsible Sourcing Standards is not a standalone document, but is imbedded in Aeven's procurement processes and procedures, and responsibility and sustainability are incorporated into the qualification- and approval processes of aeven's suppliers.

Aeven requires its suppliers to, as minimum, comply with the requirements of UN Global Compact and be actively engaged in improving their sustainability performances together with Aeven.

## 2 General compliance with laws and regulations

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Aeven's 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 suppliers 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 supplier's does not accept it either.

### **Export Control**

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

### **Privacy**

Aeven requires its suppliers 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.

### **Sustainability and transparency**

Aeven requires its suppliers to comply with the EU Taxonomy Regulation, its affiliated Delegated Acts, and the Corporate Responsibility Disclosure Regulation (CSRD) regarding disclosure of non-financial information.

### **Labor**

Aeven requires its suppliers to comply with national or international labor regulations, whichever presents the most favorable terms for local labor and as minimum comply with the requirements of the UN Global Compact.

### 3 Environment

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

Aeven requires its suppliers 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.

Furthermore, Aeven's suppliers 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, preferably with the Science Based Targets initiative (SBTi) where appropriate,
- 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 the EU Taxonomy.
- f. Aeven expects its suppliers to proactively develop, plan and supply its deliveries to aeven whilst minimizing adverse impact on the environment, which Aeven defines in line with the EU Taxonomy as impact on the climate, biodiversity and eco-systems, water- and marine resources, circular resource use, and pollution.

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Aeven's suppliers will find their impact on the environment applicable to their services to different degrees.

Therefore, Aeven will assess its suppliers' sustainability and responsibility performance based on below parameters from a life cycle perspective and a qualitative assessment of relevance for the specific supplier:

	Material environmental topics	Parameters
<b>Emissions</b>	<p><b>Energy and GHG emissions:</b></p> <p>Total use, Renewable energy use, and GHG emissions</p>	<ul style="list-style-type: none"> <li>• Monitored use</li> <li>• Energy efficiency initiatives</li> <li>• Energy mix</li> <li>• Renewable power certificates</li> <li>• Report on GHG emissions</li> </ul>
<b>Water</b>	<p><b>Water:</b></p> <p>Use, discharge, scarcity, risks, and stress levels</p>	<ul style="list-style-type: none"> <li>• Monitored use</li> <li>• Water efficiency initiatives</li> </ul>
<b>Waste</b>	<p><b>Waste:</b></p> <p>Addressing waste from operations</p>	<ul style="list-style-type: none"> <li>• Monitored use</li> <li>• Waste reduction initiatives</li> </ul>
<b>Pollution</b>	<p><b>Pollution:</b></p> <p>Addressing pollution from operations</p>	<ul style="list-style-type: none"> <li>• Monitored use</li> <li>• Pollution minimizing initiatives</li> </ul>
<b>Materials</b>	<p><b>Chemicals:</b></p> <p>Use, use of less toxic substances, and select circular chemicals</p>	<ul style="list-style-type: none"> <li>• Monitored use</li> <li>• Compliance report on applicable regulations (e.g., REACH, SVHC, and RoHS)</li> </ul>
	<p><b>Packaging circularity:</b></p> <p>Addressing packaging sources and end of life waste streams</p>	<ul style="list-style-type: none"> <li>• Monitored use</li> <li>• Re- or upcycling initiatives (programs and processes)</li> </ul>
	<p><b>Product circularity:</b></p> <p>Addressing product sources and end of life waste streams</p>	<ul style="list-style-type: none"> <li>• Re- or upcycling initiatives (programs and processes)</li> </ul>
<b>Support Environmental Management</b>	<p>Governance, continuous improvements, and certifications</p>	<ul style="list-style-type: none"> <li>• Environmental management system</li> <li>• Environmental corporate score (e.g., Sustainalytics)</li> <li>• Certified system (e.g., ISO)</li> </ul>

# 4 Social Practices

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Aeven's suppliers must support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in human rights abuses.

### Dignity and rights

Aeven's suppliers must provide their employees with equal dignity, freedom, and rights in accordance with the UN Declaration of Human Rights.

### Equality and non-discrimination

Aeven's suppliers must provide its employees with equal dignity, freedom and rights and shall not discriminate in their hiring or employment practices on grounds of race, skin color, gender, sex, sexual orientation, language, religion, disability, political or other opinion, marital status, pregnancy, national or social origin, property, or birth or other status.

Workers must not be subjected to medical tests that can be used in a discriminatory way.

### Health and safety

Aeven's suppliers must provide their employees with a safe, healthy, and hygienic workplace and accommodation, where this is provided by the company.

Aeven requires its suppliers to implement effective programs and to take appropriate precautionary measures for ensuring the safety of workers by minimizing work-related accidents and illnesses.

Aeven's suppliers must identify and assess emergency situations, implement emergency plans and response procedures in the workplace and in any accommodation provided by the company, and provide sufficient fire exits, escape routes and firefighting equipment.

### Wages and benefits

Suppliers shall pay employees at least the minimum wage required by law or the prevailing industry standard in the country, and shall provide all legally mandated benefits, including medical insurance, social insurance and pensions, in full and on time.

### Working hours and holiday

Suppliers shall not breach local regulations on working hours and shall remunerate overtime in accordance with local laws and regulations as a minimum. Employees, including those on temporary contracts, shall not be required to work more than 60 hours a week, including overtime, on a regular basis (or the maximum legal working hours if this is less than 60). Employees shall be entitled to at least one day off in every seven-day period and shall receive paid annual leave and holidays in accordance with local laws.

Wage deductions as a disciplinary measure shall not be permitted, nor shall any wage deductions not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures shall be recorded.

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### Child labor

Suppliers shall not recruit or employ child labor. The minimum age of workers shall be 15 years, or the minimum age set by the national laws in the country of manufacturing, whichever is higher. Young workers, i.e., those above the minimum age and below the age of 18, may only be employed for non-hazardous work.

### Freely chosen employment

Suppliers shall not use forced or involuntary labor (e.g., forced, bonded, indentured, or involuntary prison labor). Employers shall not retain workers' identity papers or hold deposits from workers. Workers shall have a copy of the written employment contract setting out the terms and conditions of their employment.

### Freedom of association and collective bargaining

Suppliers shall respect the rights of employees established in local law to join or not join labor unions, seek representation, and join worker organizations.

Workers shall be able to bargain collectively, and worker representatives shall not be discriminated against.

### Treatment of employees

Suppliers shall treat their employees with respect and dignity and shall not subject them to any kind of cruel, inhuman, or degrading punishment, physical, verbal, or sexual abuse, or threat of abuse or harassment.

### Treatment of indigenous peoples

Suppliers shall conduct their operations with respect for indigenous peoples and shall ensure due diligence when operating in areas where projects may affect indigenous peoples.

Suppliers shall not in any way expose indigenous peoples to exploitation or expropriation of their labor nor appropriation or their social, cultural, geographical, or economic valuables.



# 5 Governance

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Aeven's suppliers shall act with integrity while conducting business and inform Aeven of any significant impact in the supply chain and report any non-compliances to the Aeven Responsible Sourcing Standards to aeven.

### Business integrity

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

Suppliers 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. Suppliers 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 suppliers to exclusively source minerals from certifiable conflict free areas if sourcing from the Democratic Republic of Congo.

### Whistleblower program

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

### Environmental and Social management systems

Suppliers are expected to implement environmental and social sustainability governance structures appropriate to their business in terms of company size and environmental and social impact, incl. processes for

- a. how to prevent and control identified potential adverse sustainability impact, and
- b. how to treat, remediate or control identified and actual adverse sustainability impact.

## 6 Sub-suppliers

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Aeven requires its suppliers 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.

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

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

## 7 Documentation

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Aeven's suppliers must, upon request, provide Aeven with information and documentation regarding their compliance with Aeven's Responsible Sourcing Standards.