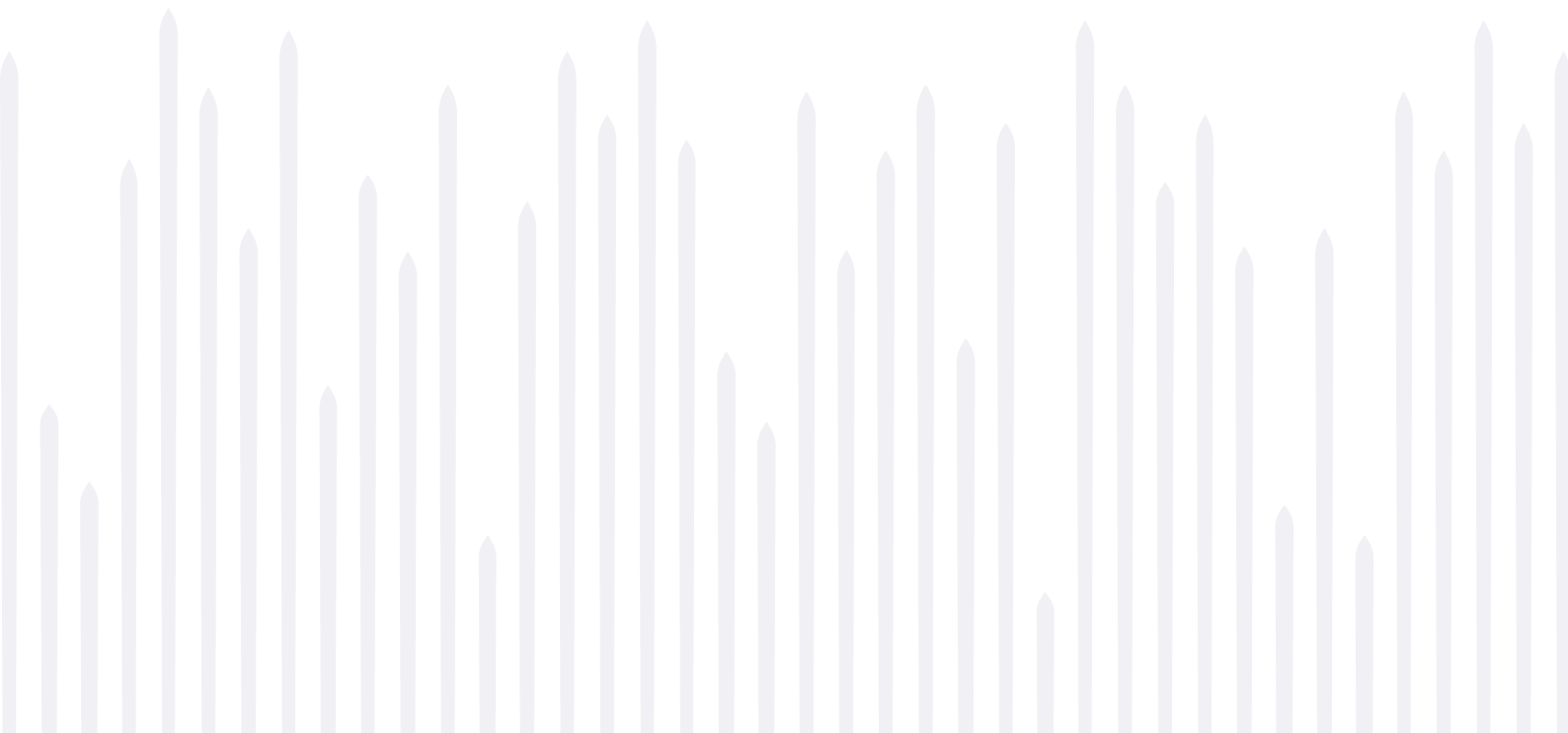


# excillum

## Code of Conduct Business Partners



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# 1 Introduction

At Excillum, we aim to be the world’s leading innovator and supplier of premium X-ray sources. By redefining the X-ray tube, Excillum is enabling new science, improving medicine and enhancing manufacturing.

In our aspiration towards our vision, Excillum is committed to conducting business in the most ethical, responsible, and sustainable way possible. It is fundamental to Excillum to comply to all applicable laws, regulations, and standards in all the countries in which we operate. In addition to that, Excillum strives to advance social and environmental responsibility and business ethics by defining a set of standards to which we hold ourselves accountable. These standards are set forth in this Code of Conduct.

It is the expectation of Excillum that our business partners, our suppliers, and other participants in our supply chain are equally committed to this Code of Conduct. It provides a clear statement of what Excillum expects in terms of social & environmental responsibility and business ethics.

# 2 Business Partner’s Commitment

This Code of Conduct applies to all participants in Excillum’s supply chain – hereafter referred to as Business Partners. A Business Partner means any entity, individual or organization including, but not limited to suppliers, sub-suppliers, distributors, contractors, consultants, channel partners or any other party involved in activities where products, services or other deliverables will be provided to or made available to Excillum, or for which Excillum will make beneficial or other non-commercial contributions.

It is Excillum’s expectation that this Code of Conduct is read, communicated, and understood by directors and employees of Excillum’s Business Partners. It is the responsibility of the Business Partner to ensure that this Code of Conduct is adhered to throughout the Business Partner’s supply chain. Excillum encourages the Business Partner to continuously improve business processes, and if/as required sets clear goals to meet the standards in this Code of Conduct. Excillum expects that any questions, concerns, or possible violations of this Code of Conduct are communicated to Excillum, and that the Business Partner fully cooperates in the event of internal or external investigations of possible violations.

Any breach of this Code of Conduct is subject to consequences, including suspension or termination of the business relationship.

Excillum reserves the right to at any time verify compliance to this Code of Conduct by e.g., on-site audits, evaluations and inspections conducted in cooperation with the Business Partner.

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### 3 Excillum’s Code of Conduct

#### 3.1 General

The Business Partner shall adopt or establish a management system with a scope that supports the content of this Code of Conduct. The management system shall be designed to ensure

- compliance with applicable laws, regulations and customer requirements related to the Business Partner’s operations and products
- conformance with this Code of Conduct
- identification and mitigation of operational risks related to this Code of Conduct
- facilitation of continuous improvement.

#### 3.2 Labour

**Freely Chosen Employment** – The Business Partner shall prohibit any use of forced, bonded, exploitive or involuntary labour, and follow the local labour and employment laws. All work, including overtime, must be voluntary, and employees must be free to leave work at any time or terminate their employment without penalty upon reasonable notice. Business Partners may not confiscate identity or immigration documents of employees such as passports or work permits.

**Child Labour** – The Business Partner must not engage in, or benefit from, the use of child labour, in accordance with the ILO convention 138.

**Working Hours** - Working hours are not to exceed the maximum set by local law and must not be more than 60 hours per week except in emergency situations.

**Wages and Benefits** - Compensation paid to Business Partner’s employees shall comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits.

#### 3.3 Workplace

**Respectful Treatment** – The Business Partner shall ensure that there is no harsh or inhumane treatment (or threat of treatment) including violence, sexual harassment, sexual abuse, mental or physical coercion or punishment, bullying, public shaming, or verbal abuse.

**Non-Discrimination/Non-Harassment** – The Business Partner shall be committed to a workplace free from harassment and discrimination based on gender, gender identity, ethnicity, faith or religion, disability, sexual orientation or age in hiring and employment practices such as wages, promotions, rewards, and personal development.

**Freedom of Association** - In conformance with local law, the Business Partner shall respect the right of all employees to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities.

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### 3.4 Health and Safety

**Occupational Safety** – The Business Partner shall provide and maintain a safe and healthy work environment and work systematically and proactively to minimizing the incidence of work-related injury and illness. The Business Partner shall comply with all applicable laws, regulations and rules governing employee occupational health and safety. Health and safety information and training shall be provided to employees in an understandable way, and employees shall be encouraged to raise any concerns without retaliation.

**Hazard Prevention** - Health and safety hazards are to be identified, assessed, and managed (mitigate/eliminate/control) through an established, systematic, proactive process. The Business Partner shall provide employees appropriate personal protective equipment and safe work procedures (including occupational health and safety training).

**Emergency Preparedness** - All potential emergency situations and events shall be identified and assessed by the Business Partner, and potential impact shall be minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, employee training, and drills.

**Industrial Hygiene** - The Business Partner shall ensure that employees’ exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, employees’ health shall be protected by appropriate personal protective equipment.

**Physically Demanding Work** - Employee exposure to the hazard of physically demanding tasks, such as manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks shall be identified, evaluated, and controlled by the Business Partner.

**Machine Safeguarding** - Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to employees.

### 3.5 Environment

Excillum’s Business Partners must develop, implement, and maintain environmentally responsible business processes and shall comply with existing legislation and regulations regarding the protection of the environment.

**Energy Use, Pollution Prevention and Waste Reduction** - The Business Partner shall ensure the minimization of energy consumption as well as the use of natural resources. Emissions and discharges of pollutants, greenhouse gas and generation of waste (including water and energy) are to be minimized or eliminated at the source by practices such as modifying production,

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maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

**Wastewater and Solid Waste** – The Business Partners should implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle (non-hazardous) solid waste.

**Air Emissions** - Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion by-products generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge by the Business Partner.

**Climate Impact** - If energy consumption or transportation is a significant environmental aspect of the Business Partner’s operations, Excillum expects the Business Partner to measure greenhouse gases emissions and have targets and plans to reduce the emissions.

**Hazardous Substances** - Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

**Conflict Minerals and Unsustainable Mined Materials** – The Business Partner shall exercise reasonable due diligence concerning its use of conflict minerals and the source of these minerals to avoid knowingly acquiring conflict minerals or unsustainable mined minerals produced at high environmental and social costs.

### 3.6 Business Ethics

**Business Integrity** - The highest standards of integrity are to be upheld in all business interactions. The Business Partner shall have a zero-tolerance policy to any and all forms of bribery, fraud, corruption, extortion and embezzlement.

**Accounting Records** – Business Partner's Accounting records must be kept and presented according to the laws of each applicable jurisdiction; in reasonable detail, accurately and fairly reflect transactions, assets, liabilities, revenues and expenses; and not contain any false or misleading entries.

**No Improper Advantage** - Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. Excillum does not accept any type of gift or any offer of hospitality from Business Partners beyond that of a representational nature. Business Partners shall ensure compliance with anti-corruption laws.

**Conflict of Interest** – Excillum expects the Business Partner to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in its dealings with Excillum. Excillum expects the Business Partner to report to Excillum any situations of actual or potential conflicts of interest between the personal interests of those involved in the dealings and the interests of Excillum.

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**Disclosure of Information** - All business dealings should be transparently performed and accurately reflected on the Business Partner’s business books and records. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

**Intellectual Property** - Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and Business Partner information is to be safeguarded.

**Protecting Sensitive, Confidential, Proprietary and Personal Information** – The Business Partner is expected to ensure that all sensitive, confidential and proprietary information (including personal data/information) is appropriately protected by implementing relevant information, IT and cyber security programmes. In its relationship with Excillum, the Business Partner must comply with all applicable data privacy laws and regulations. The Business Partner must report to Excillum any suspected or actual data breach or security incident as soon they are aware.

**Protection of Identity and Non-Retaliation** - The Business Partner should have a communicated process for their employees to be able to raise any concerns without fear of retaliation (“whistle-blower” program).

**Responsible Sourcing of Minerals**- The Business Partner shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

**Personal Data Protection** - Business Partners are to commit to protecting the integrity of personal information and data of everyone they do business with, including suppliers, customers, consumers, and employees. Business Partners are to comply with privacy and data protection laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

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