

Version: 17.06.2025

# AS TREV-2 GRUPP BUSINESS PARTNER CODE OF CONDUCT

AS TREV-2 Grupp (hereinafter referred to as **TREV-2** or **company**) aims to improve the quality of life and safety of people through its activities. We are guided by the company's vision of providing sustainable and smart solutions. We conduct ourselves in a law-abiding and dignified manner, and we expect companies that have direct contractual relationships with TREV-2 (hereinafter referred to as **business partners**) to be equally diligent with respect to social and environmental issues, business ethics, and integrity.

This Business Partner Code of Conduct sets out TREV-2's expectations for a responsible and sustainable approach to business.

#### Legal and ethical conduct

Business partner conducts themselves in a law-abiding and dignified manner and ensure that companies that have a direct contractual relationship with them and cooperate with them behave in the same way.

Business partner complies with all applicable national and international laws, regulations and requirements in the location and jurisdiction in which they operate.

# Working conditions and safety

Business partner values their employees and complies with all legislation on employment and occupational health and safety, ensuring a safe and healthy working environment for employees. All employees are treated with dignity and respect.

Business partner organises their daily activities in such a way as to prevent possible dangerous situations and accidents. Employees are provided with effective, properly maintained and appropriate personal protective equipment and it is ensured that the equipment is used for its intended purpose.

All occupational accidents are recorded, and an investigation is initiated, after which corrective measures are taken to prevent further accidents.

## **Equal treatment and human rights**

Business partner values individual and collective initiative based on trust, respect and solidarity to support the professional development of employees.

Business partner treats all employees equally and does not tolerate discrimination in any form, including based on racial or ethnic origin, colour of skin, gender, sexual orientation, gender identity, disability, age, religion, political opinion, national or social origin, and any other form of discrimination covered by EU and national law.

Business partner supports and respect the protection of international human rights and ensures that there are no human rights violations. TREV-2 does not cooperate with companies involved in human trafficking, forced or compulsory labour and child labour.

# Communication and data protection

Business partner pays great attention to the quality of the information they provide and strives to ensure transparent and reliable information for all stakeholders.

Business partner complies with the rules on the protection of personal data by collecting, using, storing, handling, transferring, and disclosing personal data in accordance with the law in force.



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#### **Conflict of interest**

Business partner should avoid contact with TREV-2 employees when it may result in a conflict with the employee's obligation to act in the best interests of TREV-2. As part of their cooperation with TREV-2, business partner must notify TREV-2 of any conflict of interest or situation that appears to be a conflict of interest.

Business partner notifies TREV-2 if an employee of TREV-2 or their close family member has a major financial or other interest in the business partner, is in a managerial position with the business partner, or works for the business partner.

### **Anti-corruption activities**

Business partner is expected to have zero tolerance for corruption. Any behaviour or action that might be considered active or passive corruption or influencing trading by complying with the law regarding corruption must be avoided.

## Competition

Business partner is expected to act in accordance with applicable competition law to ensure free and fair competition.

Business partner does not engage in anti-competitive collusion between competitors on the pricing and delivery of services, enter into agreements with suppliers that restrict or hinder competition, or engage in any abuse of a dominant position.

#### **Economic sanctions**

Sanctions prohibit or restrict financial and trade transactions with targeted individuals, entities, governments, and countries. Export control laws prohibit the unauthorised or unlicensed export, transfer and sale of certain goods, technology and technical data to certain countries, companies, and persons as well as (in some cases) re-export from one third country to another.

Business partner is expected to comply with all applicable legal requirements regarding economic sanctions and export controls.

# Reporting breaches and unethical behaviour

TREV-2 applies the principles of the Act on Protection of Persons Who Report Work-Related Breaches of European Union Law. Information on the reporting channel and procedure can be found on the TREV-2 website.

### Intellectual property and third-party copyright

Business partner is expected to protect the intellectual property and confidential information provided to them during their business activities. In addition, it is expected to comply with related contractual agreements and establish systems to ensure the data protection of intellectual property. Copying, distributing, and selling TREV-2 information, software, and other intellectual property is strictly prohibited.

# **Product/service quality**

Business partner is expected to provide high-quality goods and services. All products and services must comply with the quality and standard requirements set out in the applicable contracts and legislation.

Any problems that may adversely affect the quality and safe use of the supplied goods and services must be immediately reported to TREV-2 and mitigated immediately by the contractual partner.

In addition, business partner should inform TREV-2 about changes in procurement and production processes that may have a significant impact on the quality and safety of the goods and services.

## **Environmental protection and sustainability**



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Business partner organises their daily activities in such a way as to be able to comply with the principles of continuous environmental protection, prevent environmental pollution, reduce the environmental footprint of their activities, and increase environmental performance.

Business partner follows the principles of sustainability, considers the environment and the surrounding area in their activities, promotes and supports sustainable development and environmental protection, and complies with the requirements of environmental legislation.

### Local communities and third parties

Business partner considers that construction and infrastructure projects can have a significant impact on local communities, so they seek to identify the potential adverse impacts of their projects on local communities as early as possible by identifying potential risks and assessing community impacts. Where appropriate, dialogues with stakeholders, including communities affected by the project and/or their representatives, are initiated and maintained.

In the performance of the works, efforts are made to prevent any damage to third parties.

### Supply chain

Business partner implements the principles of this Code in their activities and, in turn, ensures compliance with them in their own supply chain.

Business partner maintains appropriate documentation to confirm and prove compliance with the Code.

## Principles of responsible/fair tax payment

The company complies with all applicable tax laws and regulations in the countries in which it operates.

Tax obligations are met accurately, correctly, and in a timely manner.

Communication with tax authorities is open, cooperative, and honest.

Aggressive tax planning and unethical tax practices that could damage the company's reputation or public trust are avoided.

Tax reporting is accurate and meets local standards.

The company is committed to responsible fiscal behaviour in order to strengthen its reputation as a reliable and transparent partner and contribute to the development and sustainability of society.

#### Implementation and monitoring

Direct contractual partners are expected to familiarise themselves with the principles set out in the Business Partner Code of Conduct, accept and comply with them, and, if necessary and possible, communicate them to the contractual partners in their supply chains. The Code of Conduct has been created to integrate or supplement legal provisions and is not a substitute for legal provisions.

TREV-2 reserves the right to monitor business partner for compliance with the Code of Conduct through appropriate documentation, self-assessments, or audits.

The Code of Conduct forms an integral part of all contracts entered into between a business partner (including supplier or subcontractor) and TREV-2.

If TREV-2 detects a violation of the Code of Conduct, the Company has the right to require that the business partner takes immediate remedial action.

If the business partner continues to violate the Code of Conduct or is unable to remedy the deficiencies, TREV-2 reserves the right to terminate the cooperation with such a business partner