



# CODE OF CONDUCT FOR SUPPLIERS

## MESSAGE FROM THE CEO

Mips is born out of a successful collaboration between the Karolinska Institute (KI) and the Royal Institute of Technology (KTH) in Stockholm, Sweden. We are based on, and should always be true to, science. Our ambition is to make our safety systems an expected feature demanded by consumers and the helmet industry for added safety. For us safety is the highest priority and should never be compromised.

We cooperate with more than one hundred brands all over the world, which sometimes can put us in complex situations. Our everyday life will present moral challenges. Therefore, it is important to have a Code of Conduct to act as a guiding principle. It offers guidance and a moral compass about how we should conduct ourselves and defines the directives and principles we follow as part of our operations. The Code applies to the entire supply chain.

I am confident that each and every one of us will do business in line with the Code of Conduct for Suppliers. Working together, we will be able to build sustainable growth, create value for all our stakeholders and reinforce our mission to lead the world to safer helmets.

**Max Strandwitz**  
President and CEO

## 1. INTRODUCTION

Mips is committed to high standards of business ethics and sustainability and to conducting our business with integrity and honesty. Our suppliers play an integral part of our journey and we can never succeed without our partners and suppliers in the value chain. We need all supplier's full commitment to support us in our sustainability journey through the care you invest in the parts, components and services you deliver but also in your own operations.

We have therefore adopted this Code of Conduct for Suppliers (the "Code"). The purpose of the Code is to define minimum requirements for all suppliers of Mips AB (publ), including subsidiaries ("Mips" or "we"). It is an integral part of the agreement between any supplier and Mips. The Code applies to all suppliers that deliver goods and/or services to any entity of Mips ("Supplier"). The term "Employee" used throughout this Code covers everyone working, or otherwise performing tasks, for or on behalf a Supplier.

The Code is based on Mips' Code of Conduct as well as international conventions and standards, such as the Ten Principles of the United Nations Global Compact, the International Labor Organization's (ILO) standards and OECD's guidelines. Mips is a signatory to the UN Global Compact and continually enhances efforts to protect and respect the UN Global Compact's 10 principles (which can be found at <https://www.unglobalcompact.org/what-is-gc/mission/principles>), and promote its spirit within the areas of human rights, labor standards, the environment and anti-corruption.

The Code supplements applicable law and external regulations and the Supplier must operate in full compliance with all laws and regulations applicable to its business.

If a Supplier fails to meet our expectations as set out in this Code, Mips' general approach is to encourage improvement. Critical deviations or repeated unwillingness to make improvements will however jeopardize the Supplier's relationship with Mips.

## 2. THE PEOPLE

### 2.1 Human rights

Mips supports and respects the protection of internationally proclaimed human rights. Mips strongly believes that the respect for employees and their human rights, regardless of their form of employment, forms the basis of any successful business. Therefore, we expect our Suppliers to respect and not infringe upon internationally recognized human rights (including the International Bill of Human Rights and the fundamental International Labour Organisation Conventions) and comply with all applicable laws in this area.

The Supplier shall recognize and respect employees' rights and freedom to join or form (non-violent) assembly or associations of their own choice and

to bargain collectively. No employee shall be subject to dismissal, discrimination, harassment, intimidation, or retaliation for exercising these rights.

Mips does not tolerate any forms of modern slavery, forced labour, or human trafficking. Consequently, the Supplier shall not engage in or tolerate restrictions of movement, confiscation or destruction of, or denial of access to, identification papers, educational certificates, travel documents and/or passports, withholding of wages, failure of providing an employment contract in a language understood by the employee, abusive working conditions, debt bondage, violence or any other kind of exploitation or abuse. Suppliers shall not charge recruitment fees from Employees or potential employees. Employees shall be free to leave their employment subject to any notice period as required by law and contract.

Mips respects, and expects the Supplier to respect, the rights of the child, in accordance with the UN Convention on the Rights of the Child and other applicable national and international child labour laws and regulations. Mips does not engage in or condone the unlawful employment or exploitation of children among our employees and/or in our facilities. Hence, we do not tolerate child labour and the Supplier shall prevent all forms of child labor. If any incidence of child labour is identified in the Supplier's operations, the Supplier shall initiate, or participate in, a program to transfer any children involved in child labour into quality education until they are no longer children. The Supplier shall also maintain appropriate and reliable age-proof for all Employees and have a written recruitment policy and system to verify the age of an Employee.

## **2.2 Wages and working hours**

The Supplier is expected to compensate Employees fairly. The Supplier shall always pay and provide its Employees' wages and benefits that, as a minimum, comply with applicable laws. Supplier shall provide its Employees with information about their employment terms and conditions, including benefits and notice periods on both sides, in a format and language they can easily understand, such as a written employment contract and a timely wage statement. Any deductions from wages shall be strictly in accordance with applicable law.

The Supplier shall always respect and comply with applicable laws on working and resting hours, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations.

## **2.3 Non-discrimination and fair treatment**

The Supplier shall treat all existing and potential Employees with respect and dignity and without prejudice, regardless of gender, transgender identity or expression, sexual orientation, nationality, religion or other beliefs, ethnicity, social origin, family or marital status, pregnancy, disability, age, or trade

union membership. Employees shall be given fair opportunities based on objective criteria such as competences, experience and performance.

The Supplier shall not tolerate harassments of any kind. The Supplier shall also not tolerate humiliating or physical punishment or allow any Employee to be subject to verbal, psychological, physical or sexual harassment or abuse. Supplier shall not resort to corporal punishment, violence or intimidation against any Employee.

### **3. THE BUSINESS**

#### **3.1 Compliance with laws and regulations and fair competition**

At Mips we are committed to sound business ethics in all our business activities and relations with stakeholders, both within our own operations but also with third parties. We conduct our business with integrity and honesty and we respect the laws and regulations in the countries in which we operate. We require our Suppliers to conduct their business in the same way and always in full compliance with all laws and regulations applicable to its business. This Code sets out minimum requirements when it comes to appropriate behaviour even if this entails a higher standard than required by applicable laws. If applicable laws are stricter than the Code, the applicable laws must always prevail.

The Supplier shall respect and always act in accordance with all applicable fair trade and competition laws (also called anti-trust laws) as well as marketing and advertising practices. The Supplier shall not engage in any illegal business, industrial co-operation or cartels.

#### **3.2 Anti-corruption**

Mips has a zero-tolerance policy when it comes to corruption, extortion and bribery. Corruption refers the abuse of entrusted power for private gain including a to behaviour that has an inappropriate impact on people's decisions and actions. This includes bribery, extortion, conflicts of interest, embezzlement, blackmail, fraud, nepotism and cronyism. The Supplier shall not engage in, endorse nor tolerate any form of corruption, directly or indirectly. The Supplier shall not offer nor accept any form of improper benefit to or from a third party, private or public, with the purpose of obtaining or retaining business or any form of preferential treatment. Such benefits may comprise not only cash but also business opportunities, favours, travel, facilitation payments, promises to pay debts or unlawful gifts and entertainment.

#### **3.3 Conflict of interest**

Mips expects the Supplier to conduct business in a manner that avoids conflict of interest situations. Any situation where a Mips employee or professional under contract with Mips may have a personal interest of any

kind in the Supplier's business or any kind of economic ties with the Supplier, shall be reported to Mips by the Supplier.

## **4. THE WORKPLACE**

### **4.1 Health, work environment and safety**

Mips is convinced that it is essential to provide a safe and healthy work environment for all employees and therefore we only engage with Suppliers that ensure their workers and employees a safe and healthy work environment. This also applies to Suppliers or business partners who provide residential facilities for their employees.

The Supplier shall ensure that its Employees' potential exposure to safety hazards, such as machines, equipment or substances, or other chemical, biological or physical agents, are identified, assessed and controlled through proper design and/or preventative maintenance and safe work procedures. Where hazards cannot be adequately controlled by these means, Employees shall be provided with appropriate personal protective equipment, including necessary training to use it, and access to first-aid supplies. Safety information shall be made available to everyone in order to educate, train, and protect the Employees from safety hazards. The Supplier shall store hazardous substances in safe, secure, separate and ventilated areas and in accordance with applicable laws and regulations. Adequate health and safety policies and procedures shall be established and followed.

The Supplier shall have adequate emergency preparedness procedures in place in order to identify and assess potential emergency situations. Emergency plans, fire safety and response procedures shall be implemented, including Employee notification and evacuation procedures, Employee training and evacuation drills. Fire safety procedures shall, where available, be periodically reviewed and approved by local authorities as required by law and regulation.

Employees shall have ready access to clean drinking water, hygienic toilet facilities, hygienic food preparation, storage and eating facilities, adequate ventilation, light and temperature levels, and acceptable levels of noise and dust pollution (as applicable) both at the work place and at the housing facilities, if provided by the Supplier. These housing facilities shall meet all requirements in local laws and regulations related to safety, security, health and hygiene.

### **4.2 Confidentiality and intellectual property rights**

The Supplier shall respect Mips' sensitive information, including confidential, proprietary and personal information and intellectual property rights by safeguarding against misuse, mishandling, counterfeit, theft, fraud or improper disclosure in accordance with applicable law and the contractual terms with Mips.

## 5. THE ENVIRONMENT

At Mips we conduct our business on a long-term basis which means that we support the preserving of a sustainable society. Our environmental responsibility is an integral part of our core activities and we expect it to be an integral part of our Suppliers' business as well. Hence, we expect our Suppliers to act in a sustainable and environmentally responsible way and to always comply with applicable environmental legislation and relevant international standards and, further, actively strive to impose as little impact on the environment as possible. The Supplier shall also work with annual target setting to reduce environmental impact. Further, the Supplier shall dispose of all waste material, by-products and hazardous pollutants in an environmentally responsible manner. The Supplier should minimize waste and maximize recycling to protect and conserve the environment. Mips encourages the Supplier to always choose the most environmentally friendly option possible regarding power supply and packaging and transportation of goods.

## 6. SUB-CONTRACTING

Mips does not permit unapproved sub-contracting under any circumstances. In the event that a sub-contractor is approved by Mips in writing, the Supplier hiring the sub-contractor must cause such sub-contractor to adhere to and comply with this Code. Additionally, the Supplier must submit to Mips, in writing, the name and the location of the sub-contractor. All production orders must be placed within facilities that have been pre-approved by Mips.

## 7. COMPLIANCE

The Supplier shall be responsible for continuously monitoring and reviewing that it acts in accordance with the expectations and requirements set forth in this Code. Mips reserves the right to follow up on compliance with the requirements set forth in this Code, and the Supplier shall, on demand, supply Mips, or a party appointed by Mips, with relevant information concerning the requirements set forth in this Code.

Should the Supplier become aware of any suspected or concluded non-compliance with the expectations and requirements set forth in this Code, or any related policy or law, the Supplier shall report its concerns immediately to the Supplier's main contact at Mips, or anonymously and confidentially by using Mips' whistleblowing service. The whistleblowing service is available at [report.whistleb.com/mipsprotection](https://report.whistleb.com/mipsprotection), where you also find more information about the reporting process.

Actions inconsistent with this Code must be promptly corrected. Critical deviations or repeated unwillingness to make corrections will jeopardize the Supplier's relationship with Mips.