



CODE OF CONDUCT FOR BUSINESS PARTNERS



Code of Conduct for Business Partners

1. Introduction

Environmental, Social and Corporate Governance (ESG) aspects are a fundamental part of BioCirc's foundation and strategy, and BioCirc recognises the huge importance of these aspects on the long-term performance of BioCirc as well as the overall impact on society. BioCirc's business partners throughout the entire value chain have a vital role to play and this Code of Conduct for Business Partners (Code) establishes our expectations and requirements to our relationships with external business partners. In this Code, Business Partner means suppliers, vendors, contractors, joint ventures partners and other third parties delivering services or products to BioCirc.

Our Code reflects our commitment to conduct business responsibly, ethically, and sustainably across our entire value chain and the purpose of this Code is therefore to:

- Provide clarity on our values and principles, and define the environmental, social, ethical, and legal standards that we expect our Business Partners to meet.
- Communicate our commitment to responsible business practices and the importance we place on integrity, respect, and sustainability.
- Require and encourage our Business Partners to uphold human rights, labour standards, and environmental sustainability.
- Encourage Business Partners to actively contribute to our shared goals of responsible and sustainable business practices.

The Code is based on, amongst others, the UN Global Compact, OECD Guidelines for Multinational Enterprises, legislative initiatives from the European Union (e.g, Corporate Sustainability Due Diligence Directive) and the UN Guiding Principles on Business and Human Rights.

While we recognise that our Business Partners operate in different geographic, regulatory, and economic environments, we aim with this Code to cultivate a community of responsible and ethical Business Partners who share our commitment to sustainable development, social responsibility, and long-term success.

Statement from BioCirc Group's CEO

At BioCirc, we are fully committed to conduct our business in a manner that respects and protects the environment, supports social well-being, and upholds a strong corporate governance. Our ESG principles underpin every aspect of our operations, shaping our decision-making and strategic direction. By integrating ESG considerations into our business practices, we aim to create long-term value for our stakeholders while positively contributing to the world around us.

We hold ourselves and our partners accountable to the highest levels of integrity, transparency, and compliance with laws and regulations. By adhering to our Code of Conduct, we create a shared commitment to responsible, sustainable, and ethical business behaviour.

By collaborating with BioCirc, you become an integral part of our vision for a better future. We value your partnership and expect that you share our commitment to enhancing the ESG agenda. Together, we can create a business ecosystem that drives positive change, respects human rights, promotes environmental sustainability, and fosters fair and inclusive practices.



2. General principles

Compliance with laws and regulations

BioCirc is committed to comply with all applicable laws, regulations, and standards governing our operations and it is essential for BioCirc that business partners also comply with all local, national, and international laws and regulations relevant to their operations. In case of contradictions between the Code and applicable laws, rules, and regulations, suppliers and partners shall inform BioCirc.

Due diligence and transparency

BioCirc conducts risk-based due diligence on its value chain and Business Partners to identify and manage potential risks and adverse impacts to human and labour rights, environment and business ethics and we expect Business Partners to avoid causing or contributing to such risks and adverse impacts. BioCirc may verify Business Partners' compliance with the Code through information requests or audits and the Business Partner shall provide reasonable assistance and documentation to assist in such processes.

BioCirc expects Business Partners to incorporate the principles and standards in this Code into their own operations, which may be done through policies and risk management systems that are appropriate for the Business Partner's size and sector. Similar, Business Partners who engage third parties in connection with the relationship with BioCirc, shall take all reasonable steps to ensure their compliance with this Code or similar generally accepted principles and standards. As part hereof, Business Partners should through a risk-based approach and subject to the principles of proportionality conduct due diligence to identify and manage potential risks related to this Code in their supply chain.

Violation of this Code

Business Partners shall promptly notify BioCirc in writing of any known or suspected violation of this Code. This can be done through the normal channels of the business relationship or through our whistleblower system.

If Business Partners does not adhere to the principles and standards set out in this Code, BioCirc will work together with the Business Partners to identify and agree on corrective actions. BioCirc will seek appropriate remedial measures to cease, prevent, and minimize the extent of the violation. Failure to comply with key principles and standards, continuous failure to comply with the Code, or repeated and unjustified refusal to engage with BioCirc and to provide the required information can result in the suspension or termination of the Business Partners' activities with BioCirc.

Continuous improvement

BioCirc encourage our Business Partners to continually assess and enhance their own practices, aligning with industry best practices and evolving standards. We foster a culture of continuous improvement and innovation in ethical, social, and environmental performance and we also expect our Business Partners to collaborate on identifying areas for improvement, share knowledge, and drive positive change.



3. Environment

Climate change and environmental protection and sustainability

BioCirc is as a bioeconomic green energy company committed to sustainability and environmental responsibility and recognize the urgent need to address climate change and environmental protection. We strive to contribute to the global effort of mitigating emissions, and we expect our Business Partners to support our mission to achieve our goals.

Business Partners must adhere to all applicable environmental laws and regulations related to climate change, emissions control, and energy efficiency and Business Partners are encouraged to follow the leading international standards.

Business Partners are expected to measure, monitor, and manage their emission footprint, striving for a systematic reduction over time. Business Partners should minimize waste and emissions from their business activities, and we expect an efficient and sustainable use of resources such as energy, water, land, and raw materials and they should make efforts to avoid and minimize environmental and ecosystem impacts.

Business Partners shall provide information regarding their emissions, energy usage, and climate-related initiatives and collaborate with BioCirc to enhance value chain transparency by sharing relevant data and information when reasonable requested in order for BioCirc to comply with legislative initiatives.

4. Social

Respect for human rights:

Business Partners are required to respect and uphold internationally recognized human rights principles, including UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

This means that Business Partners should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved. Within the context of Business Partners' own activities, they shall avoid causing or contributing to adverse human rights impacts and address such impacts when they occur. In addition, Business Partners shall seek ways to prevent or mitigate adverse human rights impacts that are directly linked to their business operations, products or services by a business relationship, even if they do not contribute to those impacts.

Business Partners should undertake human rights due diligence as appropriate to their size, the nature and context of operations and the severity of the risks of adverse human rights impacts.

Prohibition of forced labour and child labour:

Business partners must not engage in any form of forced labour, including bonded labour, indentured labour, or any coercive practices. Similarly, the use of child labour (individuals below the legal



working age in the relevant country) is strictly prohibited. BioCirc expect Business Partners to refrain from using workers under the age of 18 for work which is regarded as hazardous.

Working conditions and fair labour practices:

BioCirc require that Business Partners uphold applicable laws, regulations and collective agreements regarding working hours, resting periods and compensation and benefits. Business Partners shall implement fair labour practices, whereby Business Partners should pay fair and equal wages and benefits to workers that enable the basic needs of the workers. Business Partners shall ensure that workers' working hours do not exceed limits set by law or applicable collective agreements and provide workers with the necessary rest in order to maintain a good well-being.

Freedom of association and collective bargaining:

Business Partners must respect the rights of employees to freely associate, join trade unions or worker organizations of their choice, and engage in collective bargaining (to the extent that such possibility is available in the country). They should not hinder or interfere with these rights.

Inclusion and non-discrimination:

Business Partners should foster an inclusive and diverse work environment, free from any form of prejudice or discrimination, including but not limited to race, colour, gender, age, nationality or national origin, religion, ethnic or social origin, belonging to an indigenous people, political views or sexual orientation. This also includes promoting equal opportunities for all employees and providing fair and unbiased treatment in all aspects of the employment.

Safe and healthy work environment:

Business Partners shall ensure a safe and healthy work environment. This includes identifying and mitigating potential hazards, providing appropriate training on health and safety practices, provide safety equipment and implementing measures to prevent accidents, injuries, and occupational illnesses.

Responsible sourcing practices:

Business Partners are expected to adopt responsible sourcing practices throughout their supply chains. This includes ensuring that materials, minerals, components and products are obtained from ethical and sustainable sources in clear compliance with applicable laws and regulations. Business Partners should take proactive measures to mitigate risks associated with high-risk minerals, conflict areas, or deforestation. This may involve implementing traceability systems, conducting risk assessments, and collaborating with relevant stakeholders to promote responsible sourcing.



Contribution to the well-being of affected communities:

BioCirc expects that Business Partners respect the rights and interest of affected local communities, including economic, social and cultural rights and Business Partners are encouraged to contribute to the well-being of the communities in which they operate. This can be achieved through supporting local development initiatives, engaging in social responsibility projects, and respecting the rights and cultural practices of local communities. BioCirc also expects Business Partners to inform communities if their activities significantly impact or include significant risk of impact to the environment or the general well-being of the community.

5. Governance

Upholding high ethical standards:

Business Partners are expected to conduct their business with high standards related to ethics and governance. This includes acting with integrity, honesty, and fairness in all interactions and transactions.

Prohibition of Bribery, Corruption, and Unethical Business Practices:

Business Partners are prohibited from engaging in any form of bribery, corruption, or unethical business practices and must adhere to applicable bribery and corruption laws and regulations.

This means that the Business Partner's employees, officers and third parties acting on behalf of the Business Partner must not offer, promise, give, request, or accept bribes, kickbacks, facilitation payments or improper payments or advantages to or from any individual or entity to obtain or give any undue advantage. This prohibition applies to all business dealings, including interactions with public officials, customers, suppliers, and competitors.

Business Partners shall have in place their own processes which prevent bribery and corrupt practices, including maintain accurate and transparent records of all business transactions and subject to proportionality conduct due diligence on their third parties to ensure compliance with applicable bribery and corruption laws.

Governance and Accountability:

Business Partners shall comply with applicable laws and regulations related to corporate governance and should establish effective corporate governance structures that promote transparency, accountability, and responsible decision-making. Business Partners shall comply with applicable accounting principles, financial reporting standards, and disclosure requirements and they are expected to maintain accurate and transparent financial records and disclose relevant information in a timely manner.

Compliance with Anti-trust and Competition Laws:

Business Partners must comply with anti-trust and competition laws to ensure fair and competitive business practices. They must not engage in anti-competitive agreements, abuse of market power, or other practices that restrict free and fair competition.



Avoidance of conflicts of interest:

Business Partners shall avoid situations that could create conflicts of interest or compromise their ability to make unbiased decisions towards BioCirc. They should disclose any actual or potential conflicts of interest and take appropriate steps to manage them transparently and responsibly.

Trade Compliance:

Business Partners should comply with international sanctions laws and regulations, including restrictions on trade with embargoed countries or entities, regardless of the Business Partner not being subject to such sanctions laws and regulations. They should also adhere to export and import control restrictions and controls, ensuring compliance with customs regulations and trade compliance laws.

Data Privacy, Information Security, and Confidentiality:

Business Partners shall protect personal data and adhere to applicable data privacy regulations. They should implement appropriate safeguards to ensure the confidentiality, integrity, and availability of sensitive information. This includes maintaining high information security standards, implementing data protection measures, and safeguarding against unauthorized access or disclosure.

Taxation:

Business Partners should comply with applicable tax laws and regulations in all jurisdictions where they operate. They should accurately report and pay taxes in a timely manner and cooperate with tax authorities in a transparent and responsible manner.