

Third Party Code of Conduct

Arelion Holding AB

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1 Introduction

Arelion Holding AB and its affiliates (collectively “Arelion”) is a provider of international telecommunications services on the wholesale and corporate markets through worldwide infrastructure and presence in more than thirty countries. In its operations, Arelion is committed to running its business ethically and responsibly from a social, environmental, and professional perspective and strives to conduct business in line with such commitments.

Respectively, when interacting with third parties such as suppliers, vendors, interconnect partners, agents, consultants, contractors, recipients of donations and sponsorships or other service providers (collectively “Third Parties”, individually a “Third Party”), Arelion expects Third Parties to operate in compliance with all applicable laws and regulations to fulfil all contractual obligations, and share our commitments to ethical and responsible business conduct and the values and principles described in this Third Party Code of Conduct (referred to herein as the “Code”).

While applicable national or local customs, laws, rules and regulations may vary by country, a number of international declarations, conventions and guidelines on human rights, labor rights and conditions, environmental responsibility and anti-corruption (e.g. the UN’ Universal Declaration of Human Rights, the Core Conventions of the ILO, the OECD Guidelines for Multinational Enterprises, the UN Guiding principles on Business and Human Rights and the United Nations Global Compact Principles) demonstrate that ethical and responsible business practices are a global matter of concern and have become a guiding force in doing business throughout the whole supply chain.

This Code is intended to reflect Arelion’s commitments to the above declarations, conventions and guidelines and to provide guidance on Arelion’s expectations in doing business with Third Parties. When doing business with Arelion, it is our expectation that Third Parties will fulfil all legal, regulatory and contractual obligations and the requirements set out in this Code.

The Code constitutes an integral part of the agreement between the parties. As applicable, Third Parties may validly choose to abide by their own code of conduct or a code by a relevant industry association to the extent such code provides equivalent or similar guarantees and goals as in this Code. In such case, the code shall be approved by Arelion and included in the agreement.

Arelion expects Third Party to operate with a management system approach. All conditions in the Code should be cascaded throughout the supply chain relevant to the deliverables to Arelion. Third Party shall maintain a robust Due Diligence process addressing at a minimum, anti-corruption, human rights and environmental impact. The Due Diligence measures shall be relevant to the size and nature of the Third Party.

2 Anti-bribery and corruption

Third Party is prohibited from engaging in any form of corruption and commits to conduct its business operations in an ethical manner by maintaining a culture of integrity, transparency, openness and compliance with applicable laws, regulations and all contractual obligations with regards to:

- Prohibiting corruption in all its forms, including but not limited to prohibiting extortion, solicitation, bribery of public officials, private sector bribery, negligent financing of corruption, facilitation payments, nepotism, fraud and money laundering.
- Prohibiting any offer, promise, gift, request, agreement to accept, receipt of payments, any kind of undue benefits, charitable or political donations, directly or indirectly, to obtain or retain personal or business advantage from any public official, individual, employees or business partners.
- Establishing an adequate anti-corruption program and internal controls based on a risk assessment, considering corruption risks such as the geographical and industrial sector of business operation.

Without prejudice to the above, it is understood that conducting business under certain conditions and in certain markets may require the Code to be supplemented by specific anti-bribery and corruption provisions, which provisions will be included in the agreement as applicable.

3 Business ethics

Arelion requires ethical behavior and integrity in all business dealings. Third Parties are expected to maintain standards of integrity, transparency, and ethical conduct by:

- Establishing policies to address conflicts of interest involving its employees arising from financial interests in business partners, individuals serving as government officials at public bodies or state-owned enterprises with jurisdiction over or dealings with Third Party's business operations or personal family affiliations between its employees and those of its business partners.
- Conducting business operation in line with fair competition (e.g., preventing bid rigging or other mechanisms limiting fair competition in tenders or any form of cartel practices with competitors),
- With regards to deliveries to Arelion: utilizing responsible and ethical AI practices throughout all phases of the AI lifecycle. Including respect for human rights by ensuring fairness, diversity and equality, as well as accountability, transparency, safety and security. Responsible AI principles, including the ability to demonstrate how AI has been embedded, that it is designed with 'a human-in-control' approach and that any data used to train AI systems is obtained and processed in strict compliance with all applicable laws and regulations, and

- Comply with all applicable export control, customs, and trade sanctions laws and regulations, including but not limited to those administered by the United Nations, the European Union, its Member States, the United Kingdom, the United States of America (including OFAC, EAR, and ITAR).

4 Human Rights

Third Party commits to upholding human rights within its business operations and to treat its employees with respect and dignity and to comply with all binding legal, regulatory or contractual obligations with regards to:

- Respecting the right of freedom of expression and the privacy rights of all individuals.
- Respecting and recognizing the freedom of association and promotion of open communication between employees and management.;
- Protecting children's rights and preventing illegal, clandestine and un-declared employment, prohibition and prohibition of forced and child labor.
- Suppliers providing products including Tin, Tantalum, Tungsten, Gold and Cobalt shall ensure a Due Diligence process has been conducted in accordance with OECD 'Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; and if applicable and on request, provide a Conflict Minerals Report such as from the Responsible Minerals Initiative.
- Protection of privacy rights, particularly in relation to handling of personal data which may be subject to specific national or supra national regulations including but not limited to the General Data Protection Regulation ("GDPR") in the EU/EEA area; and
- Seeking to address any potential or actual adverse human rights impacts arising from its business operations by taking appropriate steps to avoid and/or mitigate them.

5 Labor Rights

Third Party commits to uphold reasonable labor terms of employment and standards, and to provide a reasonable work environment for its employees regarding conditions of freedom, equality, security and dignity and to comply with all binding legal, regulatory or contractual obligations concerning employment practices and workplace conditions, with regards to:

- Applying employment terms and conditions in line with all requirements set by national laws and regulations and providing fair employment conditions and rights for the employees from onboarding to termination.
- Securing reasonable working hours (with at least one day off for every seven-day period and leave periods allowed, non-excessive overtime hours and a normal work week not exceeding 48 hours).
- Securing labor rights, with regards to, living wages and benefits in line with collective bargaining agreements or industry standards, as applicable.

- Prohibiting harassment, abuse and discrimination of any kind.
- Supporting diversity, equal opportunities, prevention of discrimination or abuse of any kind during the hiring process and in any other employment practices.

6 Occupational Health & Safety

Third Party commits to provide and maintain a safe and healthy workplace for its employees, visitors and any sub-contractors working on its premises on its behalf and to comply with all binding legal, regulatory or contractual obligations with regards to:

- Preventing and protecting against workplace hazards and risks to avoid work-related accidents or bodily injuries, including during the operation of equipment or during work-related travel.
- Providing reasonable and fit for purpose workplace and premises conditions.
- Providing appropriate emergency situations preparedness, procedures and training to detect, avoid, and mitigate hazards that constitute a risk to the health, hygiene, and safety of staff.
- Providing upon request, summary of investigations of health & safety incidents in connection with the provision of services to Arelion and their mitigating activities, and
- Having a work environment management system in place for product suppliers, end-of-life suppliers and field service suppliers, even where products and services are procured through a broker, distributor or sub-contractor.

7 Environment

Third Party commits to operate in an environmentally responsible manner and to comply with all binding legal, regulatory or contractual obligations, with regards to:

- Compliance with applicable environmental regulations enacted to regulate air emissions, solid and wastewater disposal.
- Managing consumption of energy, water, paper, minerals and metals and other resources used in day-to-day operations in a responsible manner, following local conservation plans and in line with circular economy principles: eliminating waste and pollution, circulating products and materials at their highest values and regenerating nature.
- Having in place a GHG emissions reduction plan for Third Party's full value chain (Scope 1, Scope 2, and Scope 3).
- Implementing a systematic approach to identify, manage, reduce and responsibly dispose of or recycle solid waste and also ensure the proper use and disposal of hazardous waste.

- Electricity suppliers, electronic equipment suppliers, including end-of-life and recycling suppliers shall have an environmental management system in place. This also applies when products and services are procured through a broker or distributor.
- Electricity and electronic equipment suppliers, shall operate in compliance with all relevant regulations including, but not limited to, Regulation (EC) NO 1907/2006 on Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), the Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS), Directive 2012/19/EU on waste electrical and electronic equipment (WEEE) and the requirements laid down in Directive 2009/125/EC (Ecodesign). Declaration of compliance shall be provided in the agreement documentation, and
- data centre and -hosting suppliers must have implemented all relevant practices listed as “expected practices” in the most recent version of the European Code of Conduct on Data Centre Energy Efficiency, or in CEN-CENELEC document CLC TR50600-99-1 “Data centre facilities and infrastructures - Part 99-1: Recommended practices for energy management”.

8 Compliance

As part of Arelion’s efforts to do business in an ethical and responsible manner, Arelion expects that Third Party will have in place adequate internal business processes, systems and controls to promote the values and principles set forth in this Code and, more generally, securing compliance with all applicable laws, regulations and contractual obligations in the areas covered by this Code.

Prior to the commencement of provision of services to Arelion and at any time during the term of the applicable agreement, as may be required from time to time, Third Party agrees, upon request, to participate in a due diligence process organized by Arelion and to provide information and data related to its compliance with, and the measures adopted (including copies of records or written statements), to ensure compliance with this Code. As applicable, Third Party shall also provide information and data to Arelion for annual reporting purposes and other reports required by local regulations, at no additional cost.

Third Party shall promptly inform Arelion if it is unable to continue to comply with this Code or discovers a breach or suspected breach of any applicable legal, regulatory or contractual obligation in connection with the provision of service to Arelion in the areas covered by this Code or if Third Party cannot act in a manner consistent with the values and principles set forth in this Code. For any identified non-compliance with the Code, Third Party shall provide a corrective action plan to Arelion within an agreed timeframe.

In the event of Third Party’s material breach of the Code, Arelion shall have the right, upon written notice and with immediate effect, to terminate any order or the whole agreement without prejudice to any other rights and remedies available.