

SUPPLIER AND PARTNER CODE OF CONDUCT

1 EXTENT

SkiStar's *Supplier and Partner Code of Conduct* (referred to as the *Supplier Code of Conduct* below) applies to all suppliers and partners of the company (referred to as supplier below). The company's suppliers are expected to act on the basis of provisions in this Code of Conduct. The supplier shall in its agreements with subcontractors transfer these obligations to its subcontractors by communicating this Code of Conduct or similar principles. In the event of any deviations from the Code of Conduct, SkiStar will take measures which, if correction is not possible or not taken, may mean that the supplier's business relationship with SkiStar is terminated.

2 COMMITMENTS

SkiStar's Supplier Code of Conduct is based on the ten principles of the UN Global Compact regarding human rights, working conditions, environment and anti-corruption, as well as the ILO's eight core conventions regarding minimum standards for working conditions.

3 SUPPLIER CODE OF CONDUCT IN RELATION TO NATIONAL LEGISLATION

In addition to complying with this Supplier Code of Conduct, the supplier shall comply with national legislation. In situations where both the Supplier Code of Conduct and national legislation include provisions relating to the same area, the highest standard shall be applied. Should the Supplier Code of Conduct be in direct conflict with applicable law, and constitute a breach of applicable law, the highest standards shall apply that are in accordance with applicable legislation.

4 HUMAN RIGHTS

Internationally recognized human rights must be respected and complied with. The supplier undertakes not to participate in, cause or be associated with any business that waive human rights. SkiStar believes that the following are basic commitments:

- 4.1 The supplier shall respect and comply with fundamental and internationally recognized human rights in all areas of activity.
- 4.2 The supplier has a responsibility to not cause or contribute negative consequences for human rights through its own activities and to deal with such an impact when it arises.
- 4.3 The supplier shall take measures to remedy the harmful effects on human rights and to minimize the risk of it being involved in human rights violations.
- 4.4 The supplier shall support the protection of vulnerable groups and support diversity in all its forms.

5 WORKING CONDITIONS

5.1 Child Labour and Forced Labour

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The supplier opposes all forced labour, child labour and all forms of involuntary work. The working relationship between the employee and the supplier shall be freely chosen and free from threats. SkiStar believes that the following are basic commitments:

- 5.1.1 The supplier ensures that no work is performed by children or minors under the minimum age, in accordance with the laws of the country.
- 5.1.2 The supplier ensures that employees under the age of eighteen are not involved in hazardous or heavy work.
- 5.1.3 The supplier does not require the employee to deposit money, identity documents or the like in order to obtain/or retain an employment.

5.2 Discrimination

The supplier undertakes to ensure that the working environment is free of discrimination and harassment on grounds of gender, ethnicity, religion or other beliefs, sexual orientation, disability and/or age.

5.3 Terms of Employment

The supplier undertakes to compensate workers in accordance with applicable national legislation regarding minimum wages. The following are basic commitments, according to SkiStar:

- 5.3.1 The supplier shall provide all employees with at least the minimum wage in accordance with national legislation and respects the upper limits of working time and overtime allowed by law of the country in which they operate.
- 5.3.2 The supplier ensures that employees have terms of employment/contracts in a language they understand so that the specification of their terms of employment and dismissal is clear.
- 5.3.3 The supplier respects and complies with the right to freedom of association and collective bargaining in accordance with the laws of the country, and ensures that employees are free to terminate their employment in accordance with established rules.

5.4 Working Environment

The supplier shall guarantee safe and secure working environments in accordance with internationally recognized standards. The following are basic commitments, according to SkiStar:

- 5.4.1 The supplier treats all employees with respect and dignity. Employees with the same qualifications, experience and workability receive equal pay for equal work. Employees are under no circumstances subject to corporal punishment, illegal detentions, violence, threats, coercion, verbal or sexual harassment.
- 5.4.2 The supplier prioritises the health and safety of its employees. A healthy and safe working environment, including psychosocial considerations and, if applicable, housing and/or facilities must be provided for employees in accordance with international standards and national laws.

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- 5.4.3 The supplier's employees shall be offered sufficient information and training to minimize work-related risks for the employees.
- 5.4.4 Where necessary, the supplier shall carry out risk assessments and work to prevent all work-related risks to which the employees may be exposed.

6 ENVIRONMENT

The supplier undertakes to comply with relevant environmental requirements in accordance with internationally recognized environmental standards. Proactive and systematic environmental work shall be conducted through sound knowledge of the environmental impact of the supplier's operations in order to minimize impact. SkiStar believes that the following are basic commitments:

- 6.1.1 The supplier applies a precautionary strategy for how the business is conducted.
- 6.1.2 The supplier takes appropriate measures to avoid and / or reduce its climate footprint and works continuously to improve its environmental work.
- 6.1.3 The supplier continuously improves its environmental work by identifying, assessing and manage environmental risks and effects in its value chain.
- 6.1.4 The supplier strives to support the Paris Agreement.

7 BUSINESS ETHICS AND ANTI-CORRUPTION

7.1 Anti-Corruption and Bribes

The supplier undertakes to refrain from all forms of corruption including the giving and taking of bribes as well as extortion.

- 7.1.1 The supplier shall have zero tolerance of all forms of corruption including, but not limited to, bribery, extortion, fraud and money laundering. The supplier must maintain the highest ethical standards and act with integrity when doing business.
- 7.1.2 The supplier shall prevent and counteract that the supplier's activities can be used for the purpose of money laundering.
- 7.1.3 No employee of the supplier may offer or promise, give or accept, directly or indirectly any payment, gift or benefit in exchange for special treatment with the intention of affecting a business transaction or gaining a personal or commercial advantage.
- 7.1.4 The supplier shall take effective measures to avoid, or if necessary counteract, possible and actual conflicts of interest.

8 PERSONAL DATA

In conjunction with the supplier's cooperation with SkiStar, both parties will process personal data. In cases where the parties consider that both parties are independent individually responsible for their respective processing of personal data, the supplier undertakes to process such personal data in accordance with the GDPR and other applicable data protection legislation. In cases where the parties

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consider that one party acts as data processor to the other party, in its capacity as data controller, the supplier undertake to enter into a separate personal data processing agreement with SkiStar.

9 AUDIT

Upon request, the supplier shall provide SkiStar with information and data that ensures compliance with SkiStar's Supplier Code of Conduct. SkiStar has the right to carry out site visits with the supplier. Site visits can be performed by SkiStar employees or independent third parties.

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