

Syre Supplier Code of Conduct, version 1:3

1. Policy and purpose

Syre Impact AB and its affiliates (jointly, “**Syre**”) are committed to operating with fair labor conditions, responsible environmental practices and full transparency. Syre seeks partners who share these values.

This supplier code of conduct (the “**Code**”) establishes the environmental, social, and governance standards that guide Syre and its suppliers. It sets expectations for fair and safe working conditions and environmental responsibility across our value chain. This includes our own operations, supply chain and the communities where we operate. We aim to achieve these standards through strong and collaborative relationships with our suppliers.

2. Scope

The Code applies to all Syre’s consultants, suppliers, or joint venture partners (jointly, “**Suppliers**”).

Syre and its Suppliers must comply with applicable laws and regulations. Should the Code be in violation of any national laws or regulations, such law or regulation shall prevail. In situations where the Code stipulates higher standards than required by national laws or regulations, the Code shall be complied with.

The Code can be unilaterally withdrawn, adjusted, or amended by Syre at any time without prior notice.

3. Commitments

International frameworks & Regulations

Our Code is grounded in international standards and best practices, including the principles and standards of:

- [The Paris Agreement](#)
- [Agenda 2030 and corresponding Sustainability Development Goals \(SDG’s\)](#)
- [The United Nations Guiding Principles on Business and Human Rights](#)
- [The United Nations Universal Declaration of Human Rights](#)
- [The United Nations Global Compact](#)
- [International Labor Organization \(ILO\) conventions](#)
- Children's and women's rights as outlined in:
 - [The United Nations Convention on the Rights of the Child](#)
 - [The United Nations Convention on the Elimination of Discrimination against Women](#)
- [International Bill of Human Rights](#)
- [The Children's Rights and Business Principles](#)
- [OECD Guidelines for Multinational Enterprises](#)

As well as the following industry specific practices:

- [Zero Discharge Hazardous Chemicals \(ZDHC\) Manufacturing Restricted Substances List \(MRSL\)](#)
- [ZDHC Wastewater Guidelines and Chemical Management System](#)

We expect our Suppliers to align with these principles. We recognize that legal and cultural contexts differ and we aim to achieve full compliance through collaboration. Syre is committed to supporting Suppliers with knowledge and training.

4. Environmental Responsibility

Together with our Suppliers, we promote responsible resource use, green energy, and environmental practices that reduce negative impacts. Green energy encompasses the following energy sources: solar, wind, hydropower, bioenergy, geothermal, concentrated solar power, and ocean energy and nuclear power.

Resource management

Suppliers are expected to follow the “do no significant harm” principle through their operations, including protecting water resources, supporting circular use of materials, preventing pollution, addressing climate risks, and safeguarding biodiversity and ecosystems. Waste must be handled responsibly and in compliance with applicable laws and regulations, and illegal dumping or improper disposal of waste is strictly prohibited.

Chemicals

Suppliers that handle, use, or produce chemicals must maintain a chemical inventory, including product name, manufacturer, CAS number, hazard classification, quantity, and storage location. Chemicals must be stored, handled, used, and disposed of in accordance with their Safety Data Sheets (SDS).

Monitoring & Reporting

Suppliers must maintain all required environmental permits and ensure they are valid and up to date. Suppliers shall use only Syre-approved facilities for handling goods and must obtain written authorization before production begins.

We expect our Suppliers to monitor and report their greenhouse gas emissions and water consumption annually; this should be available at request.

5. Human Rights and Social Impact

The well-being of everyone in our value chain is our priority. Syre is committed to upholding human rights and fair labor practices in line with international standards together with its Suppliers. Suppliers must respect the human rights of all individuals, including employees, applicants, contractors, consultants, part-time workers, migrant workers, interns, full-time employees, and other representatives when they are acting on behalf of Syre.

Non-discrimination

Suppliers must provide a workplace free from discrimination, harassment, intimidation and bullying. Equal pay for work of equal value must be ensured. Discrimination based on personal characteristics, including, race, gender, religion, political affiliation, social origin, disability, age, parental or marital status, sexual orientation or other status is not permitted.

Forced labor

At Syre, we stand firmly against forced, bonded, prison and illegal labor. Employment must be voluntary, and workers must be free to end their employment at any time.

Child labor

Child labor is strictly prohibited. Suppliers must not employ workers below the legal minimum age, and in no case under 15 years. Suppliers must develop a child labor policy and a remediation plan if applicable. Young workers, aged 15 to 18 years, are not permitted to work during night hours or in hazardous conditions.

Freedom of association and collective bargaining

Suppliers must ensure that workers can freely exercise their right to organize, form, and join unions. Workers must be allowed to negotiate working conditions collectively, without fear of retaliation. Where restricted by law, alternative forms of worker representation should be supported.

Workplace and fair labor conditions

Suppliers must provide all workers with a written contract, in a language they understand, detailing payment and working hours. All workers must receive sufficient training. Every worker has a right to compensation for a regular work week that is sufficient to meet basic needs for themselves and their families and provide some discretionary income.

Deductions from wages as a disciplinary measure are prohibited. Working hours must comply with applicable laws, and overtime should be voluntary. Workers are entitled to at least one day off in seven and must be given reasonable breaks from work and sufficient rest periods between shifts. All recruitment related fees should be covered by the Supplier.

Suppliers must ensure that employees are entitled to sick leave, annual holidays, and parental leave as mandated by national legislation. Employees who take such leave must not face dismissal, discrimination, or threats of dismissal as a result. Social and parental benefits -such as maternity and paternity leave- as well as insurance must be provided as required by national legislation.

Safe and healthy workplace

Suppliers must take all necessary measures to minimize the risk of accidents, injuries and death in the workplace. This includes having systems and processes to comply with national safety and health regulations. Workers must be informed about safety and health risks and instructed on how to mitigate them. Necessary and suitable personal protective equipment must be provided at no cost.

Facilities must meet basic health and safety standards, including sanitary facilities, proper lighting, fire prevention, emergency exits, and first-aid arrangements. Free, clean drinking water must always be easily available. No undeclared units are allowed and all legal permits and licenses must be up-to-date. The workplace should appoint a person in charge of health and safety within the management team.

Respect for indigenous and migrant rights

Suppliers must respect the culture, heritage, and traditional rights of indigenous peoples and ensure the protection of cultural heritage sites. Migrant workers, contractors, and other workforce members should receive the same benefits as local employees, with all job-related fees covered by the Supplier.

6. Governance and Business ethics

We uphold high standards of governance, integrity, transparency, and compliance with zero-tolerance for bribery and corruption. We expect our Suppliers to follow the same principles by conducting business ethically, avoiding improper advantages in any form and ensuring that their employees and representatives act with integrity.

Conflict of interest

Business must be conducted based on objective considerations, not personal interests. Suppliers must disclose any actual or potential conflicts of interest involving individuals responsible for purchasing or other decision-making at Syre. Suppliers must ensure that such situations are managed transparently and in a manner that upholds fair and ethical business practices. Conflicts can arise from family ties, personal relationships, or anyone who could benefit from the purchase or decision in any other way.

Anti-bribery and anti-corruption

At Syre we expect our Suppliers to have a zero-tolerance approach to bribery and corruption. No bribes or improper advantages including, kickbacks, gifts, or entertainment may be given or accepted. These rules apply to both private and public sectors. To be compliant with the Code, the Supplier must develop their own anti-corruption and bribery policy. Syre will provide training and help if required. Suppliers must not provide Syre employees with gifts or hospitality that might influence their decisions.

Whistleblowing

Syre is committed to creating a safe, open, and transparent workplace culture, where concerns of any kind can be raised, and where whistleblowers are supported, treated fairly and anonymously. Syre's whistleblowing system can be used by: Syre's employees, board members, shareholders, interns, volunteers, agents, candidates and all other third parties acting on behalf of Syre such as its consultants, suppliers, or joint venture partners. All whistleblowers are protected against reprisals. This protection also applies to those assisting the whistleblower. Suspicions of misconduct can be reported 24/7 via [Lumgo's web form](#), accessible through Syre's website.

Money laundering and financing of terrorism

Syre is committed to combating money laundering, sanctions violations and financing terrorism. Syre has a strict prohibition on doing business with sanctioned parties. Suppliers must ensure that their employees are familiar with applicable laws and have routines to ensure compliance.

Taxation

We expect our Suppliers to comply with applicable tax laws and manage tax matters as a part of their general governance and risk management.

Competition

We expect our Suppliers to comply with competition laws and compete fairly. Practices that undermine competition, such as price fixing, market allocation, bid rigging, or abuse of a dominant position are strictly prohibited.

Confidentiality

We expect our Suppliers to protect confidential information and only use such information solely for legitimate purposes. Intellectual property of Syre and of others must not be misused or disclosed to third parties without the property authorizations. Suppliers must ensure that their employees are familiar with applicable obligations (including data protection and privacy laws) and have routines to ensure compliance.

7. Implementation

All Suppliers must be compliant with the Code at contract signing. Where this presents specific challenges, Syre may on - an exceptional basis - work with a Supplier to achieve compliance prior to start of delivery through a stepwise approach, supported by desktop due diligence, audits and sustainability training.

Suppliers shall appoint a senior member of management responsible for overseeing compliance with the Code, ensure it is communicated to all relevant employees and displayed in the local language. Suppliers must cooperate fully with Syre and its appointed advisors by providing access to relevant information.

Suppliers are responsible for cascading the entry requirements in their supply chain. In the event of any incidents, these should be reported to Syre immediately, so that, together, we can develop and implement an effective remediation plan.

Sub-supplier requirements:

- No operations and sourcing from sanctioned;
- No undeclared units and all legal permits and licenses up-to-date;
- Existing contracts in understandable language for all employees;
- Social and parental benefits-such as maternity and paternity leave-as well as insurance coverage, provided as required by national legislation;
- Safe work environment and focus on workers' health and safety;
- Zero-tolerance for forced labor;
- Zero-tolerance policy for bribes and corruption;
- Zero-tolerance for intimidation, harassment & bullying; and
- Zero-tolerance for child labor.

Sustainability reporting

All Suppliers must share relevant sustainability data about environmental, social, and governance practices at least once a year upon request. The data should be uploaded following Syre's provided practices. Suppliers are also expected to support Syre's traceability efforts by providing accurate and relevant data regarding materials, production processes, and supply chain activities when requested.

Training

Syre's online sustainability training programs are mandatory for all Feedstock Suppliers in the supply chain. Each Supplier must ensure that at least one of its senior member of management participates in training programs provided by Syre.

8. Non-compliance with this Policy

By entering into a business relationship with Syre, Suppliers commit to the Code and agree to comply with its provisions. We recognize that challenges may arise and aim to address them through collaboration and transparency. However, serious or repeated violations are not acceptable. Non-compliance with the Code may therefore result in corrective actions, including the termination of the business relationship with Syre.

If Suppliers need to report any violation or wrongdoings related to the Code, or if they have any questions about its contents or application, please reach out to our Syre Sustainability Director, sustainability@syre.com. The concerns will be managed confidentially.

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Policy adopted by	Board of Syre Impact AB
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To be reviewed	Annually
Policy owner	Sustainability Director