

# Revenio Group Corporation

## Global Supplier Code of Conduct



# REVENIO

## Contents

Introduction .....	3
Purpose of Supplier Code of Conduct.....	3
Scope.....	3
Complying with applicable laws.....	4
Human rights.....	4
Integrity.....	4
Labor conditions .....	4
Environment .....	5
Fair business practices .....	6
Hospitality, gifts, and entertainment.....	6
Anti-corruption and bribery.....	6
Conflicts of interest.....	6
Fair competition.....	6
Anti-money laundering .....	6
Financials and accounting practices .....	6
Trust - Protecting personal data and confidential information .....	7
Non-Compliance .....	7
Reporting concerns .....	7

## Introduction

Revenio is a provider of comprehensive eye care solutions operating in the international market and a global leader in ophthalmological devices and software solutions. Revenio aims to increase the quality of clinical diagnostics through product innovation and streamline clinical care pathways with integrative and proactive eye care solutions.

Revenio operates globally according to its strategy and values. They form a strong basis for fruitful relationship between Revenio and its Suppliers.

Values of Revenio are:

- Trust & Integrity
- Quality & Innovation
- People & Teamwork

Revenio is committed to long-term sustainability in our business operations. We apply the European Union's sustainability frameworks accordingly, and guide our sustainability work and goals with regards to it. See Revenio's Code of Conduct as well as Sustainability and ESG reports for further information. These commitments are reflected in our Supplier relationship.

## Purpose of Supplier Code of Conduct

Revenio wants to build and sustain long, reliable, ethical, and open business partnership with its Suppliers and aspires for mutually beneficial co-operation. Revenio strives for continuous development and improvement in our environmental, social and economic performance. Revenio sees close co-operation with Suppliers as an important means to improve our efforts for sustainability.

This Revenio Global Supplier Code of Conduct ("Code") describes our expectations towards our Suppliers and provides guidance on how the Suppliers can meet them.

## Scope

This Code applies to all companies ("Suppliers") providing products and / or services to any Revenio Group company. Revenio expects its Suppliers to comply with this Code and implement the principles of it in all their business activities. Suppliers are also expected to comply with any additional requirements agreed in the Supplier contracts. This includes the Suppliers' employees, consultants, and sub-contractors. Suppliers shall monitor their compliance with this Code on an on-going basis.

Our Suppliers should encourage their business partners to comply with this Code.

# REVENIO

The Code builds on the ten principles of UN Global Compact and therefore includes four themes: human rights, labor, environment and fair business practices. Ten principles of UN Global Compact are derived from:

- the Universal Declaration of Human Rights
- the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- the Rio Declaration on Environment and Development
- the United Nations Convention Against Corruption

Therefore we are committed to support the above declarations.

## Complying with applicable laws

Revenio is committed to conducting our business in compliance with all applicable laws and regulations. We also expect our Suppliers to know, comply with and respect all applicable national/local laws and regulations.

## Human rights

Revenio expects its Suppliers to respect internationally recognized human rights that are expressed in the United Nations Universal Declaration of Human Rights. Suppliers shall not be involved in human rights violations. Suppliers should monitor their human rights impacts continuously and implement mitigation actions when relevant.

Suppliers shall treat its employees in a fair and equal manner complying with all related laws, commit to non-discrimination and not to use forced labor.

## Integrity

Suppliers shall promote equal opportunities, diversity, and non-discrimination. No discrimination on the grounds of gender, age, race, religion, or beliefs, ethnic or national origin, marital/civil partnership status, sexuality, disability, union membership, or political affiliation shall take place. Equal opportunity to all employees shall be offered. Discrimination in hiring, compensation, access to training, promotion, termination, or retirement shall not be tolerated.

No form of harassment shall be tolerated. All employees are entitled to good, courteous, and respectful treatment. Mutual trust and respect are at the core of Revenio's corporate values and the same is expected from our Suppliers.

## Labor conditions

The requirements of labor conditions in this Code are based on principles of International Labour Organization and ILO's Declaration on Fundamental Principles and Rights at Work, including themes such as freedom of association, wages and working hours, forced and child labor, young workers, non-discrimination and health and safety.

# REVENIO

Suppliers shall ensure that all employees enter into employment with the company of their own free will and not apply any coercion when engaging employees.

Suppliers shall ensure that wages paid meet or exceed the legal or industry minimum standards and are sufficient to meet personnel's basic needs and provide some discretionary income.

Suppliers shall ensure that minors are adequately protected; and as a fundamental principle, not to employ children or support the use of child labor, except as part of government-approved youth training schemes (such as work-experience programs, summer trainee etc.).

Suppliers shall facilitate regular consultation with all employees to address areas of concern. According to local laws and regulations, Suppliers shall respect the right of all personnel to form and join trade unions of their choice and to bargain collectively.

Suppliers shall provide a safe and healthy working environment at all sites and facilities. Suppliers shall prevent occupational accidents and injuries by minimizing, as far as is reasonably practicable, the causes of hazards inherent in the working environment.

Suppliers shall comply with applicable laws and industry standards on working hours, including overtime and employee's right to rest.

## Environment

ESG performance of our Supplier candidates is relevant in the Supplier screening and selection process. Business critical Suppliers are evaluated based on their ESG performance and plans. We do development and correction planning together with our critical Suppliers in accordance with Revenio's targets.

Revenio is committed to managing our operations in an environmentally responsible manner. We focus on continuously reducing our environmental impact in co-operation with our Suppliers, and therefore promote open information sharing by our Suppliers where relevant in accordance with e.g. emission reporting.

We comply with applicable environmental laws, regulations and standards such as REACH and RoHS, and we expect our Suppliers to do the same. This includes requirements for chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting. Suppliers must comply with all requirements regarding conflict minerals, exercise proper due diligence, and provide evidence that they are complying. We also expect our Suppliers to improve their environmental performance on a continuous basis and to reduce waste from transportation, inventory, motion, waiting, over-production, over-processing and defects.

# REVENIO

## Fair business practices

### Hospitality, gifts, and entertainment

While it may sometimes be appropriate to exchange business courtesies in certain locations, it is never appropriate to give or receive a hospitality or gift or offer of entertainment if it is extravagant, creates a sense of obligation, or is given with the intent to influence a business decision. Suppliers should not offer hospitality, gifts or entertainment to Revenio employees during a Request for Proposal (RFPs) or other vendor-selection process.

### Anti-corruption and bribery

No matter where the Supplier conducts business for Revenio, the anti-corruption laws must be followed. Bribery – giving or receiving money or any other benefit in order to impact decision-making in favor of the company – is forbidden. Suppliers shall not tolerate, permit, or engage in any form of corruption, extortion, or bribery.

If you believe bribery or corrupt practices are occurring within our supply chain, report your concerns to Revenio immediately, either directly to a Revenio representative, or by submitting a report to Whistleblowing service, which is available from <https://report.whistleb.com/en/revenio>.

### Conflicts of interest

Revenio avoids and eliminates conflicts of interest. We expect our Suppliers to inform us immediately if a situation arises which appears to involve a conflict of interest affecting Revenio.

### Fair competition

Revenio believes in fair competition and complies with applicable competition laws. We expect our Suppliers to commit to the same. Suppliers shall not enter into any agreements (written or oral), or engage in other forms of activities, which prevent or restrict competition and breach applicable competition laws.

### Anti-money laundering

Suppliers shall comply with anti-money laundering obligations and refrain from any activities which may be considered part of the money laundering process, such as diminishing the origins of money deriving from criminal activities, e.g. fraud, tax evasion, human trafficking, or bribery. Suppliers are expected to comply with all applicable laws and regulations regarding export control and export restrictions.

### Financials and accounting practices

As our Supplier, you must keep accurate books and records of all your business dealings, both on-going and past, with Revenio. These records must be in accordance with applicable standard accounting practices. If you know of any actual or potential financial, accounting, or books and records issue related to Revenio, speak to a Revenio representative, or submit a report to Whistleblowing service at <https://report.whistleb.com/en/revenio>.

# REVENIO

## Trust - Protecting personal data and confidential information

We expect our Suppliers to respect the right to privacy, and to handle personal data and confidential information responsibly. This includes complying with all applicable data protection and information security laws and regulations when personal data are collected, stored, processed or transferred. We also expect our Suppliers to protect confidential information from unauthorised disclosure or misuse.

Revenio protects our Suppliers' confidential information. In return, Suppliers must protect Revenio's confidential information. The Supplier shall never disclose such information to anyone without our explicit authorization. This includes, but is not limited to, all of the following:

- The terms and conditions of Supplier's agreement with Revenio
- Revenio business and marketing plans
- Revenio intellectual property (trade secrets, trademarks, copyrights, patents, and other intellectual property) and technical information
- Revenio product plans and designs
- Revenio business processes
- Personal employee or contractor information
- Any data generated by Revenio, or received by Revenio from a third party, that contains or is based on confidential information.

Only individuals who need to know Revenio's confidential information for the purpose for which Revenio engaged the Supplier should have access to it, and such individuals may only use it for the purpose for which Revenio made it available to the Supplier.

If the Supplier becomes aware of an actual or potential security breach involving Revenio information, Revenio must be informed immediately.

## Non-Compliance

Revenio expects our Suppliers to produce and maintain honest and accurate accounting and business records. That includes reasonable documentation to demonstrate compliance with this Code. Suppliers should monitor their own operations—including next-tier Suppliers—through appropriate due diligence, audits, and similar activities. Revenio reserves the right to audit or inspect Suppliers' records and facilities, as applicable and permitted by law.

Failure to comply with this Code may result in Revenio reviewing and potentially terminating our co-operation with the Supplier, subject to existing contractual obligations.

## Reporting concerns

We count on our Suppliers to help our businesses succeed and to uphold our values and our high ethical standards. To meet this expectation, we are committed to creating an environment where our Suppliers feel comfortable raising concerns and getting help.

# REVENIO

This Code serves as a guide to ethical Supplier conduct. However, no single document can answer every question. If you are unsure of what to do, talk to your Revenio contact. Voicing concerns helps us all to do business ethically and to proactively address problems or issues. Revenio conducts business in accordance with high legal and ethical standards. If you believe that someone - whether an employee of a Supplier or a Revenio employee - is not meeting the requirements in this Code, you should report your concerns.

If you feel that you are unable to share your information openly, we provide you with an opportunity to anonymously [and in your native language] express your concern via web-based whistleblowing channel managed by an external partner, [WhistleB](#).

Any breaches of this Code or other laws or policies will be investigated. As a Revenio Supplier, you are expected to cooperate fully with any investigation. Based on the findings, appropriate corrective or preventive measures will be taken. There will be no measures taken against a person who has submitted a notification. Neither are countermeasures tolerated from any other person or group. All whistleblowing notifications are handled confidentially.