

# Business Relationships Code of Conduct

## Introduction

At Capture One, we are committed to delivering high quality products without compromising our social, environmental and ethical business standards. This entails embedding responsible business conduct principles in our operations as well as in our business relationships. The purpose of this Business Relationships Code of Conduct (CoC) is to communicate our expectations towards our business relationships, including suppliers, partners, and consultants.

We expect our business relationships to demonstrate responsible business conduct by establishing processes to assess risks of adverse impacts and to implement measures to prevent, mitigate, and remediate adverse impacts on the areas covered by internationally agreed principles for sustainable development. These include the UN Global Compact principles, the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. Meeting the minimum standard for responsible business conduct is distinct from legal compliance. Business Relationships are always expected to comply with the laws where they operate.

## Human and Labor Rights

At Capture One, we treat each other with respect, and we are committed to supporting proper terms of employment and working conditions. We support and respect internationally proclaimed human rights stated in the International Bill of Human Rights and the core labour rights from the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

### *Specific expectations towards business relationships:*

- To adhere to all applicable laws and regulations concerning employer/employee rights and obligations
- To respect the right to freedom of association and the right to collective bargaining
- To support the elimination of all forms of forced or compulsory labour including child labour
- To refrain from discriminating based on age, gender, physical ability, ethnicity, religion, culture, sexual orientation, or political views or other
- To provide a safe and secure workplace that supports the well-being of employees
- To provide employees adequate rest and leisure
- To pay a living wage

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- To provide a healthy and safe working environment for all employees
- To respect employees' right to privacy
- To respect the right to parental leave

## Climate and environment

In Capture One, it is important for us that we conduct business in a sustainable way with care for the environment.

### *Specific expectations towards business relationships:*

- To comply with local environmental regulation and maintain the necessary registrations, permits and licenses.
- To carry out operations with care for the environment and to strive to minimize adverse impacts on the environment, such as disproportionately large amounts of CO2 emissions and waste.
- To handle air emissions and appropriately handle waste, attempt to minimize energy consumption and waste and to reuse and recycle resources and materials.
- To monitor and continuously strive to improve environmental performance, e.g. by having an environmental management system in place.

## Anti-corruption and business ethics

Capture One conducts business ethically and in compliance with all applicable laws and regulations. We work against corruption in all its forms, including extortion and bribery and expect the same of our business relationships.

### *Specific expectations towards business relationships:*

- To refrain from any form of corrupt practices, including bribery, kickbacks, facilitation payments, and nepotism.
- To not engage in money laundering or any activity that facilitates money laundering.
- To always comply with applicable law and to refrain from aggressive tax planning.
- To protect confidential information and refrain from any form of anti-competitive behaviour.
- To conduct business in accordance with applicable sanctions and export control laws and regulations.

## Implementation

Capture One reserves the right to request and obtain further information and documentation of business relationships' compliance with this Code of Conduct. If the business relationship does not meet the expectations outlined in this Code of Conduct, Capture One reserves the right to terminate its contract.

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## Raising a concern

At Capture One, we encourage you to be open and honest, and we will support all who report violations as well as those who request assistance or have concerns. You are responsible for reporting violations and expressing concerns regarding non-compliance with this Code of Conduct.

If you detect or suspect any concerns or illegal or unethical business behavior, you can report it to us.

## Approval

This policy was most recently approved by the Board of Directors on 22<sup>nd</sup> May 2024.