Axiomatics Code of Conduct for Suppliers

Effective: November 30, 2018

Axiomatics provides externalized dynamic authorization through attribute and policy-based access control for databases, applications and APIs. Our solutions are ideal for enterprises and government agencies that must securely share information (often across country borders) while complying with complex and ever-evolving regulations. At the core of our technology lies the Externalized Access Control Mark-up Language (XACML) – we are editors for the standard and actively contribute to the development and promotion of it.

When conducting our company activities we will comply with all applicable laws, regulations and requirements and strive to continuously improve our social and environmental performance throughout the value chain. We take full responsibility for our actions and we expect our suppliers to do the same.

The Code of Conduct for Suppliers sets out basic requirements on human rights, labor, environment and business integrity. The code is based on the UN Global Compact. Axiomatics expects its suppliers to uphold and comply with the principles as described in this Code of Conduct for Suppliers or at least apply an equivalent standard and conduct their business activities accordingly.

Axiomatics can monitor compliance of suppliers towards the requirements in this Supplier Code of Conduct by requesting its suppliers to provide relevant information and to conduct audits and assessments of the supplier’s operations.

**Human rights and labor rights**
Axiomatics expects its suppliers to respect and protect internationally proclaimed human rights, as described in the Universal Declaration of Human Rights adopted by the United Nations, both in the workplace as well as in their general business activities. All employees and workers should be treated honestly, with dignity and respect.

**Freedom of association and collective bargaining**
Suppliers shall recognize and respect the rights of employees to freely associate, organize and bargain collectively, if they so wish to. In situations where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations, suppliers are expected to allow alternate forms of worker representations.
Modern slavery and forced labor
Suppliers shall not participate in, or benefit from any form of forced labor, including bonded labor, involuntary prison labor, slavery, servitude or work performed under the menace of a penalty or coercion. All forms of modern slavery are unacceptable.

Child labor and young workers
Suppliers shall work against all forms of child labor. Suppliers shall not employ children below the minimum age of employment or the age for completing compulsory education in that country, whichever is higher. Suppliers shall not employ any workers under the age of 18 to perform any work that is defined in national law as hazardous.

Non-discrimination
Suppliers shall not practice any form of discrimination in hiring and employment practices. Illegitimate grounds for discrimination include but are not limited to: race, color, gender, age, language, property, nationality or national origin, religion, ethnic or social origin, caste, economic grounds, disability, pregnancy, belonging to an indigenous people, trade union affiliation, political opinion, sexual orientation.

Health and safety
Suppliers shall ensure a safe and healthy workplace or any other location where work is undertaken. All work shall be preceded by and be based on documented adequate risk management with implemented controls. This shall include physical, social and organizational health risks. Risks shall be reduced according to the following hierarchy: Elimination, substitution, engineering controls, administrative controls, and as a last hand alternative, personal protective equipment.

Wages and benefits
Suppliers should strive to pay all workers a wage that meets basic needs and provides a discretionary income. In compliance with all applicable laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Suppliers should ensure that normal working hours and overtime working hours are within the limits permitted by applicable laws and regulations or agreed to in relevant collective agreements.

Environment
Axiomatics expects its suppliers to manage their operations responsibly in relation to environmental risks and impacts, to adopt a precautionary approach, and to have a life cycle perspective in their business operations. Resources such as water and energy should be used efficiently and impacts on biodiversity as well as services provided by our ecosystems should be minimized.

Environmental legislation
Suppliers shall obtain and maintain all required permits and licenses and comply with the operational and reporting requirements of such permits and licenses.
**Environmental protection**
Suppliers shall endeavor to avoid or reduce any waste or emissions as a result of their business activities. Suppliers should use efficient technologies which aim to reduce the environmental impact as much as possible.

**Environmental management systems**
Suppliers whose activities have an environmental impact shall have a structured and systematic approach to take environmental aspects into account that includes establishing suitable management systems to improve environmental performance, setting targets and performing follow-ups.

**Business integrity**
Axiomatics expects its suppliers to conduct business in compliance with all applicable national and international laws and regulations and adhere to internationally agreed standards of business ethics.

**Compliance with laws and regulations**
Suppliers shall comply with all applicable laws, rules and regulations in the countries where they operate.

**Anti-corruption**
Suppliers shall not engage in or tolerate any form of corruption, bribery, extortion or embezzlement. Suppliers shall not offer or accept any benefits or other means to obtain any undue or improper advantage. Such improper benefits may comprise cash, non-monetary gifts, pleasure trips or services and amenities of any other nature.

**Conflict of interest**
Suppliers shall avoid conflicts of interest that may compromise the supplier’s credibility within our company or other exterior parties’ confidence in our company.

**Fair competition**
Suppliers shall respect and comply with all applicable competition laws and regulations and not enter into discussions or agreements with competitors concerning pricing, market sharing or other similar activities.

**Protection of intellectual property rights and confidential information**
Suppliers shall respect intellectual property rights and protect confidential information by safeguarding it against misuse, theft, fraud or improper disclosure.
Commitment
Axiomatics expects suppliers to commit to the requirements mentioned in the code by implementing management systems and control mechanisms and execute follow-ups when a possible or potential violation has come to their attention.

Management system and monitoring
Suppliers should have adequate management systems and controls in place to ensure compliance with the code or equivalent standards. The functioning and quality of the supplier’s management system should be in proportion to the size, complexity and risk environment of the supplier’s business. Suppliers should secure and monitor that their own suppliers and sub-suppliers comply with the code or, where applicable, their own equivalent code of conduct.

Consequences in case of violations
Suppliers shall address any violations of the code or equivalent standards that come to their knowledge and to take appropriate actions. Depending on the severity of the violation appropriate actions could be a request for corrective measures. Persistent failure to comply with code or repeated and unjustified refusal to provide the required information may also result in suspending or terminating the suppliers activities.