

## SUPPLIER CODE OF CONDUCT

This *Supplier Code of Conduct* describes the corporate responsibility requirements for our suppliers.

It is the policy of ECO3 BV ("ECO3") to conduct business in compliance with the laws and widely accepted norms of fairness and human decency, and we require our suppliers to act similarly.

As a condition of doing business with ECO3 or any of its affiliated companies, we expect our suppliers to conform to these requirements. ECO3 will assess conformance to these requirements and consider a supplier's progress in meeting these requirements and their ongoing performance in making sourcing decisions.

We expect our suppliers to correct non-conformance issues identified during assessments. If suppliers refuse, or are unable to correct the non-conformance to our satisfaction, ECO3 will terminate the relationship as a last resort.

Our requirements for supplier conduct are as follows:

### **1. Legal Compliance**

Suppliers will comply with the laws of the applicable jurisdiction(s) and maintain compliance systems and be able to demonstrate a satisfactory record of compliance with the laws and widely accepted norms of fairness and human decency in their conduct.

### **2. Prohibition of Corruption & Bribery**

Suppliers will tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision-making in violation of law.

Moreover, suppliers will tolerate no form of commissions or compensation or gratuities to employees of ECO3 or its affiliates.

Suppliers will maintain integrity, transparency and accuracy in corporate record keeping.

### **3. No Unfair Business Practices**

Suppliers will act with integrity and lawfully in the proper handling of competitive data, proprietary information and other intellectual property, and comply with legal requirements regarding fair competition, antitrust, and accurate and truthful marketing.

#### **4. Anti-Discrimination**

Suppliers will promote equal opportunities for and treatment of its employees irrespective of color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age, and respect the personal dignity, privacy and rights of each individual.

#### **5. No Harsh or Inhumane Treatment**

Suppliers will refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination, and prohibit behavior including gestures, language and physical contact, that is sexual, coercive threatening, abusive or exploitative.

#### **6. Freely Chosen Employment**

Suppliers will respect for the basic human rights of employees and not use forced, prison or indentured labor, and will ensure that terms of employment are voluntary.

Suppliers will not employ or make anyone work against his will, or adopt practices that restrict the ability of employees to terminate employment.

Moreover, employees will not be required to lodge deposits, or hand over government-issued identification, passports or work permits as a condition of employment, unless required by law.

#### **7. Prohibition of Child Labor**

Suppliers will ensure to employ no workers under the age of fifteen (15) or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of fourteen (14).

Moreover, suppliers will ensure that workers under the age of eighteen (18) do not perform hazardous work and be restricted from night work if it interferes with educational needs.

#### **8. Freedom of Association & Collective Bargaining**

Suppliers will recognize, as far as legally possible, the right to free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions, as well as the right to collective bargaining.

In all cases, employee rights to open communication, direct engagement, and humane and equitable treatment must be respected.

## **9. Fair Working Hours**

While it is understood that overtime is often required, suppliers will manage operations that are compliant with the law and ensure that overtime does not exceed levels that create inhumane working conditions.

## **10. Wages & Benefits**

Suppliers will provide fair remuneration and guarantee the applicable national statutory minimum wage, and comply with the maximum number of working hours laid down in the applicable laws.

Moreover, suppliers will provide workers with an understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

## **11. Health & Safety of Employees**

Suppliers will take responsibility for the health and safety of its employees and operate a safe and healthy work environment.

Moreover, suppliers will control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases, and provide training and ensure that employees are educated in health and safety issues.

Suppliers will set up or use an occupational health and safety management system.

## **12. Environmental Protection**

Suppliers will act in accordance with the applicable statutory and international standards regarding environmental protection, minimize environmental pollution and make continuous improvements in environmental protection.

Moreover, suppliers will implement and operate an environmental management system in accordance with ISO 14001, or equivalent.

ECO3 prefers to work with suppliers that make efforts to reduce their carbon footprint, and encourages suppliers to create products that are energy efficient, highly recyclable and contain significant amounts of recycled materials and low amounts of hazardous materials.

To enable ECO3 to evaluate supplier components and products for environmental performance, suppliers must provide material disclosures as outlined in our controlled and reportable materials disclosure process.

### **13. Supply Chain Security**

While ECO3 is committed to implementing security controls and measures within its supply chain through its participation in the EU Authorized Economic Operator (AEO) and CT-PAT programs, it is required to cascade the security requirements of the program to its suppliers to ensure that security requirements are in place and adhered to throughout its supply chain.

Thus, ECO3 expects its suppliers to take responsibility to adopt and implement sound security controls and measures in order to ensure supply chain security for their part of the supply chain, or for the goods or services under their control.

For that purpose, ECO3 reserves the right to screen and evaluate its suppliers and require them to implement such measures and requirements through appropriate contractual arrangements.

### **14. Management System**

Suppliers shall adopt or establish a management system that supports the content of this code.

Such management system will be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to supplier operations and products; (b) conformance with this code; and (c) identification and mitigation of operational risks related to the areas covered by this code.

Moreover, the management system should drive continual improvement.