

Supplier Code

Solidus Solutions

Version Control and Distribution List

Version control

Section Affected	Change Description	Version	Date	Author
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Distribution list

Recipient	Approved	Reviewed	Information
Board	O/S		
Senior Management Team	N/A	O/S	Following approval
Audit Committee	N/A	O/S	Following approval
Users			Following approval

Approving authority

This policy is subject to Board approval.

Effective date

Policy's original effective date: 30/04/2022

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Purpose

Solidus Solutions Group and affiliated companies (hereinafter referred to as "Solidus") is committed to conducting business with honesty and integrity and to adhering to local and international legislation and regulations, and expects the same from its suppliers and other business partners. The purpose of this policy is to guide you as you fulfil your role as a Solidus supplier or business partner. This policy is not intended to change or replace any specific contractual requirement. Rather, this Supplier Code establishes the basic principles for business conduct that Solidus expects from you. If a contract between us contains stricter or more detailed requirements than this Supplier Code, we expect you to meet those stricter or more detailed contractual requirements.

Statement

Solidus has agreed to abide by moral and ethical values in the governance of the company. We expect our third-party suppliers and business partners to respect and adhere to the same philosophy in managing their own companies.

We seek to work with suppliers and business partners that agree to comply with the requirements of this Supplier Code, which also abides by the principles stipulated in the Conventions of the International Labour Organization, the Universal Declaration on Human Rights, the guiding principles of the OECD (Organization for Economic Co-operation and Development) and the principles of the Global Compact.

Any breach of conduct or any infringement of this code of conduct by our suppliers, business partners or their subcontractors will result in a review and possible termination of the business relationship.

Scope

This policy applies to all Solidus suppliers, their factories, business partners, subcontractors, as well as their own suppliers.

This policy covers:

- Labour;
- Health and Safety;
- Environment;
- Business ethics;
- Management system.

Policy Ownership

The Board of Solidus is the owner of this policy and bears the ultimate responsibility for this policy.

Responsibilities

The Audit Committee reviews this policy annually.

The Compliance Manager's responsibilities include the following:

- To ensure communication of this policy and associated documents to users and potential users.
- To ensure that all relevant managers and other staff receive regular and appropriate training on this policy.
- To update the policy when required and to initiate the annual review by the Audit Committee.

Guidelines

1. Labour

Suppliers are committed to upholding the human rights of workers, and to treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labour standards are:

Freely chosen employment

Forced or indentured labour (including debt bondage), involuntary prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work or to terminate their employment at any time. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Excessive fees are unacceptable and all fees charged to workers must be disclosed.

Child labour avoidance

Child labour is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 16 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is the higher age. The use of legitimate workplace apprenticeship programmes, which comply with all legislation and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardise the health or safety of young workers.

Working hours

Studies of business practices clearly link worker strain to reduced productivity, increased employee turnover and increased injury and illness. Working weeks are not to exceed the maximum set by local legislation. Furthermore, a working week should not be more than 48 hours per week, including overtime, except in emergencies or unusual situations. Workers shall be allowed at least one day off per seven-day week.

Wages and benefits

Compensation paid to workers shall at least comply with all the applicable wage legislation, including that relating to minimum wages, overtime and statutory benefits. Workers shall be compensated for overtime at rates in compliance with local legislation. Deductions from wages as a disciplinary measure shall only be performed in accordance with the law. The basis on which workers are being paid is to be provided in a timely manner with a pay slip or similar documentation.

Humane treatment

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

Non-discrimination

Suppliers should be committed to a workforce free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, health (including pregnancy), nationality, religion, committing or conviction of

criminal offense, political affiliation, union membership or marital status in hiring and employment practices, such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests for any discriminatory purposes.

Freedom of association

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, to join or not join trade unions, to seek representation, and to join works councils in accordance with local legislation shall be respected. Workers shall be able to communicate and share grievances with management regarding working conditions and management practices in an open manner and without fear of reprisal, intimidation or harassment.

2. Health and safety

Suppliers recognise that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production, and worker retention and morale. Suppliers also recognise that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are:

Occupational safety

Worker exposure to potential safety hazards (e.g. electrical and other energy sources, fire, vehicles, and falling hazards) are to be controlled with proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag out), and ongoing safety training. Where hazards cannot be controlled adequately by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Workers shall not be disciplined for raising safety concerns in good faith.

Emergency preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimised by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

Occupational injury and illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

Industrial hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposure. When hazards cannot be controlled adequately by such means, worker health is to be protected by appropriate personal protective equipment programmes.

Physically demanding work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks, is to be identified, evaluated and controlled.

Machine safeguards

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained, where machinery presents an injury hazard to workers.

Sanitation, food and housing

Workers are to be provided with ready access to clean toilet facilities, safe drinking water, and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a labour agent are to be maintained to be clean and safe, and provided with appropriate emergency exits, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

3. Environment

Suppliers recognise that environmental responsibility is integral to producing world-class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimised while safeguarding the health and safety of the public.

The environmental standards are:

Environmental permits and reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

Pollution prevention and resource reduction

Waste of all types, including water and energy, is to be reduced or eliminated at source or by practices, such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and reusing materials.

Hazardous substances

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterised, monitored, controlled and treated as required prior to discharge or disposal.

Air emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterised, monitored, controlled and treated as required prior to discharge.

Product content restrictions

Suppliers are to adhere to all applicable legislation, regulations and customer requirements regarding the prohibition or restriction of specific substances, including labelling for recycling and disposal.

4. Ethics

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

Business integrity

The highest standards of integrity are to be upheld in all business interactions. Suppliers and business partners shall have a zero-tolerance policy that prohibits any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings should be performed transparently and should be reflected accurately in the Supplier's or business partner's business accounts and records. Monitoring and enforcement procedures are or will be implemented to ensure compliance with anticorruption legislation.

No improper advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

Disclosure of information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. The confidentiality of such information is to be respected. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.

Intellectual property

Intellectual property rights are to be respected; transfer of technology and know-how is to be carried out in a manner that protects intellectual property rights.

Fair business, advertising and competition

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.

Protection of identity

Programmes that ensure the confidentiality and protection of supplier, business partner and employee whistle-blowers are to be maintained.

Privacy

Suppliers and business partners are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security legislation and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Non-retaliation

Suppliers and business partners should have a communicated process for their personnel to be able to raise any concerns in good faith without fear of retaliation.

5. Management system

Suppliers shall adopt or establish a management system with a scope related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable legislation, regulations and customer requirements related to the Supplier's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continuous improvement.

The management system should contain the following elements:

Company commitment

Corporate social and environmental responsibility policy statements affirm the Supplier's commitment to compliance and continuous improvement, and are endorsed by executive management.

Management accountability and responsibility

Clearly identified company representatives responsible for ensuring implementation of the management systems and associated programmes, where senior management reviews the status of the management system on a regular basis.

Statutory and customer requirements

A process to identify, monitor and understand applicable legislation, regulations and customer requirements, including the requirements of this Code.

Risk assessment and risk management

A process to identify the environmental, health and safety, and labour practice and ethics risks associated with the Supplier's operations, along with a determination of the relative significance of each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

Improvement objectives

Written performance objectives, targets and implementation plans to improve the Supplier's social and environmental performance, including a periodic assessment of the Supplier's performance in achieving those objectives.

Training

Programmes for training managers and workers to implement the Supplier's policies, procedures and improvement objectives and to meet applicable statutory and regulatory requirements.

Communication

A process for communicating clear and accurate information about the Supplier's policies, practices, expectations and performance to workers, suppliers and customers.

Worker feedback and participation

Ongoing processes to assess employees' understanding of and to obtain feedback on practices and conditions covered by this Code and to foster continuous improvement should be in place.

Audits and assessments

Periodic self-evaluations to ensure conformity with statutory and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

Corrective action process

A process for the timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

Documentation and records

Creation and maintenance of documents and records of regulatory compliance and conformity with company requirements along with appropriate confidentiality to protect privacy.

Supplier/business partner responsibility

A process to communicate Code requirements to suppliers and to monitor supplier compliance with this Code.

6. Additional provisions

Data privacy and protection of information

Personal Information is any kind of information that can be related to an identified or identifiable individual. This includes, but is not limited to name, address, email, phone number, credit-card information, social-security number, other identification number (e.g. HR-ID), etc.

Suppliers that have access to Personal Information of Solidus, its customers or partners are to:

- implement appropriate technical and organisational measures to protect information against threats to confidentiality, integrity and availability;
- process, share, store and transmit personal information only for the purpose the data was collected or provided for; and
- comply with all data privacy and data protection requirements defined in the contract between the Supplier and Solidus.

Intellectual property

All IP provided, disclosed or licensed to the Supplier, including trademarks, patents, copyrights, and business secrets or information, whether registered or unregistered, are owned by Solidus and the Supplier or business partner agrees to use such IP solely for the limited purpose of complying with the terms of the relevant agreement with Solidus, and in no event shall the Supplier or business partner seek registration of such IP, either directly or indirectly, and shall not produce and/or distribute unauthorised and/or counterfeit Solidus products.

Gifts

Solidus' internal policies prohibit gifts and entertainment given by or received from our suppliers that are considered lavish, not reasonable under the circumstances and designed to influence decision-making or judgment. In some situations, all gifts are prohibited. Please be mindful of these standards when considering providing such a benefit to a Solidus employee.

Monitoring & enforcement

Solidus expects Suppliers, business partners and their employees to respect this Code and to strive to achieve and uphold the standards described in it. Solidus stands ready to assist Suppliers to achieve compliance. Although we recognise cultural differences may exist, Solidus will not compromise on the fundamental requirements set out in this Code. When requested, Suppliers must inform Solidus where each order is to be produced, and Solidus reserves the right to make unannounced visits (or to have a designated party make unannounced visits) to sites where people directly – or indirectly – work for Solidus and/or Suppliers.

Suppliers, business partners and/or their workers or subcontractors should promptly notify Solidus' Group Compliance Office if they suspect, observe or learn of unethical business conduct or the performance of any dishonest, destructive or unlawful act. Please direct any questions/concerns to noncompliance@Solidus-Solutions.com or use our Speak Up system. You can report your concerns [online](https://www.speakupfeedback.eu/web/solidussolutionsexternal) via www.speakupfeedback.eu/web/solidussolutionsexternal, by using the QR-code below or by phone to the Speak Up Line, available in the countries as shown below. All reports are made

confidentially and you can share your concerns anonymously, provided this is permitted by the laws of your country, or not.

This policy may be amended at any time.

Speak Up Line (access code: 37094) in:

BELGIUM	0800-71365
FRANCE	0800-908810
GERMANY	0800-1801733
NETHERLANDS	0800 0222931
POLAND	008004411739
PORTUGAL	800-831528
SPAIN	900-973174
UNITED KINGDOM	0800-1693502

