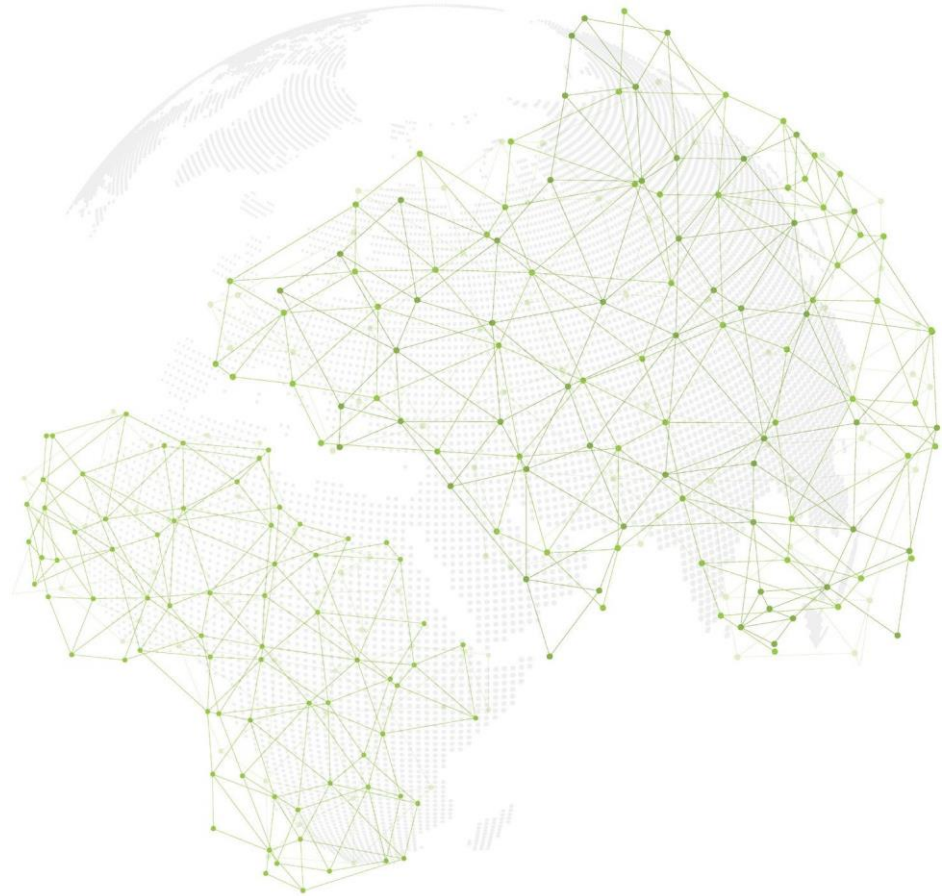




Supplier Code of Conduct



Introduction

Expereo is committed to act with honesty and integrity, in accordance with high ethical and legal standards in all business dealings and we expect our Suppliers to share this commitment as well. This Supplier Code of Conduct (hereinafter referred to as the “Code”) sets out the essential requirements expected from our Suppliers as regards compliance with laws and regulations, corruption and bribery, social and working conditions, child labor and the environment. We expect our suppliers to share this commitment and to make reasonable efforts to promote the compliance of their own suppliers and subcontractors with the principles of this Code

Legal Compliance

Expereo expects its suppliers to comply with the applicable national, international laws, and regulations, including the International Labor Organization (ILO) and the General Declaration of Human Rights of the United Nations, industry standards and all other relevant legal directives. Should the legal requirements or other regulations in individual countries in which the supplier is active deviate from the specifications of the Code of Conduct, the stricter of the two sets of directives is to be complied with.

Employment

Expereo expects that their suppliers recognize the basic rights of their employees and undertake to comply with these and to treat the employees with dignity and respect, in keeping with the understanding of the international community. In particular, the supplier must observe the following regulations.

Modern Slavery

Suppliers shall not engage in any practices that constitute modern slavery including people trafficking, slavery, servitude, forced labor, debt bondage, forced marriage and deceptive recruitment.

Free choice of employment

All employment is voluntary. Forced labor, forced prison labor, conscription of work force and slave trading is strictly forbidden.

No child labor

In accordance with the regulations of the ILO, the Convention of the United Nations and national law, the use of child labor is strictly forbidden. Of these various laws, that which imposes the strictest requirements is to be adopted in each case.

Remuneration and benefits

All applicable laws, regulations and industry standards on remuneration and benefits are to be complied with. Deductions from benefits as a disciplinary measure are not permitted. Deductions from benefits that are not foreseen by national law are also impermissible, without the explicit consent of the employee affected.

Hours of work

All applicable laws, regulations, and industry standards on hours of work are to be complied with. Overtime must be voluntary.

Non-discrimination

The suppliers must comply with all applicable statutory regulations on the prohibition of discrimination, at the time of appointment and during employment, based on race, religion, color, nationality, physical ability, physical constitution, sexual orientation, state of health, political affiliation, gender identity, age, appearance or membership of associations, marital status, possible parenthood, and other legally protected characteristics.

Freedom of association and right to collective bargaining

Suppliers must recognize the law on freedom of association and collective bargaining within the legally permissible framework.

Health and safety

Suppliers must provide their employees with safe and healthy workplaces, complying with all applicable laws, regulations, and industry standards. Abuse, harassment, bullying and/or intimidation at the workplace must not be tolerated. The suppliers fulfill all health and safety requirements.

Working conditions

Suppliers must provide their employees with appropriate work facilities. At least access to drinking water and sanitary facilities must be ensured and fire-safety measures, access to emergency medical care, and appropriate lighting and ventilation must be provided.

Non-retaliation

Suppliers must respect and recognize that none of its workers will be disadvantaged for exercising their basic human rights, submitting grievances, or reporting legal violations in the workplace.

Environment

Expereo expects their suppliers to comply with all applicable laws and regulations, as well as internationally recognized standards, on protection of the environment.

Environmental Authorization

The supplier must ensure that all necessary environmental authorizations and licenses have been obtained, and that these are kept up-to-date and are followed to always act in conformity with the law. Supplier must ensure adherence to applicable rules regarding ethical & responsible standards including environmental protection and sustainable development, as contained in Electronic Industry Citizen Coalition (EICC) in so far as accepted and/or ratified by its country and any national legislation implementing these. Supplier shall a) implement appropriate and effective policies in order to ensure compliance and shall report on its compliance upon written request; and b) request Supplier's subcontractors to adhere to compatible high standards as set out above.

Use of resources

As part of our commitment to sustainability and regulatory compliance, we require our suppliers to adhere to the EU directive on Waste Electrical and Electronic Equipment (WEEE Directive 2012/19/EU). This directive aims to reduce the environmental impact of electrical and electronic equipment by promoting the collection, recycling, and responsible disposal of such products.

Suppliers must avoid environmental pollution and minimize waste. Suppliers are obliged to optimize consumption of natural resources, including energy and water. Sound measures must be adopted to avoid pollution and the generation of waste, sewage, and air emission. Sewage and waste must be appropriately marked and treated in accordance with the applicable laws and regulations before discharge or disposal.

Hazardous materials and product safety

Suppliers are obliged to mark dangerous materials, chemicals, and substances and to ensure that these are safely handled, transferred, stored, recycled, reused, and disposed of. All applicable laws and regulations relating to dangerous materials, chemicals and substances must be strictly complied with. Limitations on materials and product-safety requirements stipulated by applicable laws and regulations must be observed.

Fair Business Practices

Combating Bribery and Corruption

Expereo expects that its suppliers comply with all applicable laws and regulations relating to corruption, bribery, fraud and prohibited business practices. Guided by the OECD Convention on Combating Bribery and the UN Convention against Corruption, Expereo maintains a zero-tolerance policy regarding bribery and corruption. Expereo's Management is committed to contribute to combating and preventing bribery and corruption in the public and private sector and Expereo expects that its suppliers too comply with all applicable laws and regulations relating to corruption, bribery, fraud and prohibited business practices. Suppliers must ensure they adhere to ethical practices guided by Electronic Industry Citizen Coalition (EICC), the UN Convention against Corruption (UNCAC) as signed up to and/or ratified by your country (www.unodc.org/unodc/en/treaties/CAC/signatories.html), and the OECD Convention on Combating Bribery in so far as signed up to by their respective country. Supplier shall a) implement appropriate and effective policies in order to ensure compliance and shall report on its compliance upon written request; and b) request Provider's subcontractors to adhere to compatible high standards as set out above.

Combating bribery

Suppliers must ensure that their employees and subcontractors do not offer, promise, or give Expereo employees any benefits aimed at obtaining an order or other preferential treatment in the context of business transactions. Invitations and gifts for Expereo employees or for persons close to them are only to be given if these are of insignificant financial value and correspond at the business level to customary practice. In the same way the supplier shall request no inappropriate benefits from Expereo employees.

Fair competition

Expereo expects its suppliers to behave fairly in competition and observes the applicable restrictive trade practices laws. The supplier must neither conclude agreements with competitors, which violate restrictive trade practices law, nor take improper advantage of a possible market-dominant position.

Money laundering

Suppliers must not participate in money-laundering activities and must comply with the relevant statutory obligations aimed at prevention of money laundering.

Conflicts of Interest

Suppliers must disclose to Expereo any potential conflicts of interest with Expereo employees or our customers.

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Confidential Data, Communications

Communications

Suppliers shall not publish any communication about their business relations with Expereo without Expereo's prior written consent or as otherwise stated in any written agreement between Expereo and the Supplier.

Confidential information

Suppliers must treat business correspondence confidentially. Confidential information, all sorts of protection-worthy data and the intellectual property rights of Expereo must be properly safeguarded in accordance with the respective statutory stipulations. Expereo expects its Suppliers to adhere to applicable rules regarding data protection & retention.

Confidential information includes, among other things, any non-public information concerning Expereo, its operation, employees, financial condition or performance, prospects, and its intellectual property ("IP"). IP is information owned by Expereo, including copyrights, patents, trademarks, trade secrets, design rights, logos and similar intellectual property rights.

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Conclusion

Expereo seeks to employ people and do business with companies who believe that honest and ethical behaviour is not only good business, but also the right thing to do. We expect our suppliers to cooperate with our reasonable request for information, certifications, and/or audit access. When there is a concern, our practice is to work with our business partners. We may be able to identify possible improvements. However, when an issue cannot be corrected or a business partner is unwilling to engage or breaches the CoC, Expereo reserves the right to end the relationship with the Supplier.

Development of the Code of Conduct

Expereo will review this code regularly and, where necessary and appropriate, will make amendments to it. Notification of important changes will always be sent to the suppliers. The newest version of the code can be found on Expereo website: <https://www.expereo.com/Supplier-Expereo-Code-Of-Conduct.pdf>