

# SUPPLIER CODE OF CONDUCT



# Table of contents

- 1. INTRODUCTION ..... 1
  - 1.2 UN GLOBAL COMPACT ..... 1
  - 1.3 MANAGEMENT SYSTEMS ..... 2
  - 1.4 IMPLEMENTATION AND COMPLIANCE ..... 2
  - 1.5 MONITORING ..... 2
  - 1.6 SPEAK OUT ..... 2
- 2. LEGAL COMPLIANCE ..... 3
- 3. HEALTH AND SAFETY ..... 3
- 4. HUMAN RIGHTS AND WORKING CONDITIONS ..... 4
  - 4.1 MODERN SLAVERY ..... 4
  - 4.2 DISCRIMINATION, HARASSMENT AND HARSH OR INHUMANE TREATMENT ..... 4
  - 4.3 CHILD LABOUR ..... 5
  - 4.4 HUMAN RIGHTS DUE DILIGENCE ..... 5
- 5. EMPLOYEE RIGHTS ..... 5
  - 5.1 WORKING HOURS AND REMUNERATION ..... 5
  - 5.2 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING ..... 6
- 6. ENVIRONMENT ..... 6
  - 6.1 ENVIRONMENT ..... 6
  - 6.2 HAZARDOUS SUBSTANCES ..... 7
- 7. RESPONSIBLE SOURCING OF MINERALS AND METALS. .... 7
- 8. BUSINESS ETHICS ..... 8
  - 8.1 ANTI-CORRUPTION ..... 8
  - 8.2 COMPETITION LAW ..... 8
  - 8.3 PROTECTION OF PERSONAL DATA ..... 8
- 9. CUSTOMS AND EXPORT CONTROL ..... 9
- 10. DATA PRIVACY ..... 9
- SUPPLIER ACCEPTANCE ..... 10

# 1. INTRODUCTION

In today's global environment, HP Tronic Group contributes to sustainable development by identifying, preventing, mitigating and reporting any negative impacts within the areas defined by the UN sustainable development goals. Our suppliers are an important part of the sustainability process – thus, HP Tronic Group supports and encourages suppliers to behave ethically in all aspects. This includes to care for the environment, to set good examples in how we conduct ourselves with one another as employees and business partners, and to always respect laws and regulations wherever we operate. We are all responsible for the economic, environmental and social impact our activities have on the world. Therefore, HP Tronic Group has developed a Code of Conduct to guide us and our suppliers in this responsibility.

Our Code of Conduct is based on the ten principles of the UN Global Compact and expresses the expectations we have of our suppliers. Our Code of Conduct is the top level of a framework that also consists of detailed policies and directives. We encourage our suppliers to establish their own codes of conduct based on these standards. All persons and entities supplying goods or services to HP Tronic Group shall comply with our Code of Conduct.

Each section of the Code of Conduct is structured as follows:

- **REQUIREMENTS** It is the supplier's responsibility to meet the requirements set out in the Code of Conduct, in their own organisation as well as in their supply chain.
- **GUIDE** Examples of how to meet the requirements.
- **HOW WE VERIFY COMPLIANCE** Examples of proof of compliance with the requirements.

## 1.2 UN GLOBAL COMPACT

The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles for human rights, labour, environment and anti-corruption.



### Human Rights

- |                     |  |
|---------------------|--|
| <b>Principle 1.</b> | Businesses should support and respect the protection of internationally proclaimed human rights. |
| <b>Principle 2.</b> | Businesses should make sure that they are not complicit in human rights abuses.                  |

### Labour

- |                     |  |
|---------------------|--|
| <b>Principle 3.</b> | Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining. |
| <b>Principle 4.</b> | Businesses should uphold the elimination of all forms of forced and compulsory labour.                                   |
| <b>Principle 5.</b> | Businesses should uphold the effective abolition of child labour.  |
| <b>Principle 6.</b> | Businesses should uphold the elimination of discrimination in respect of employment and occupation.                      |

### Environment

- |                     |   |
|---------------------|---|
| <b>Principle 7.</b> | Businesses should support a precautionary approach to environmental challenges.                     |
| <b>Principle 8.</b> | Businesses should undertake initiatives to promote greater environmental responsibility.            |
| <b>Principle 9.</b> | Businesses should encourage the development and diffusion of environmentally friendly technologies. |

### Anti-corruption

- |                      |  |
|----------------------|--|
| <b>Principle 10.</b> | Businesses should work against corruption in all its forms, including extortion and bribery. |
|----------------------|--|

## 1.3 MANAGEMENT SYSTEMS

We encourage our suppliers to strive for continual improvements and to establish, implement and maintain recognised management systems and standards related to the operational areas described in the Code of Conduct. Risk assessment, implemented policies, processes and procedures, clearly communicated roles and responsibilities, relevant training and instructions, establishment and evaluation of measurable goals, together with effective governance systems, form the basis for successful implementation of the Code of Conduct. Employees must have the right to report concerns regarding compliance with legal requirements or company policies/regulations to their employer without fear of retaliation.

## 1.4 IMPLEMENTATION AND COMPLIANCE

HP Tronic expects all its suppliers to respect the Code of Conduct and actively do their utmost to comply with our standard requirements.

We believe in a close cooperation with our suppliers and are open to alternative approaches in specific cases. We are prepared to take political and cultural differences or other factors that may vary from country to country into account, but we will not compromise regarding the basic requirements of safety and human rights.

When evaluating a supplier's compliance with the Code of Conduct, HP Tronic Group considers the scope and applicability of the requirements in relation to the nature of the supplier's business and associated risks. We expect suppliers to give HP Tronic Group the right to visit all factories/suppliers that provide goods/services to us at any time without notice. We also reserve the right to have an independent party (i.e. an independent organisation or consulting firm), appointed by us, carry out inspections to ensure compliance with the Code of Conduct.

If a supplier fails to meet the expectations of the Code of Conduct or demonstrates repeated reluctance to make improvements, the supplier's relationship with HP Tronic Group may be jeopardised. This is considered a substantial violation of the Code of Conduct and gives HP Tronic Group the right to terminate the contractual relationship with that supplier.

## 1.5 MONITORING

All business relationships between HP Tronic Group and our suppliers must be based on honesty, trust and cooperation. By accepting the Code of Conduct, the supplier is bound to meet these requirements within their own business and supply chain. This is achieved by the supplier cooperating with HP Tronic Group in a transparent manner and upon request demonstrates compliance with such requirements.

HP Tronic Group may verify the supplier's compliance with the requirements of the Code of Conduct through dialogue, a self-assessment form or on-site audits (as agreed with the supplier).

It is the supplier's responsibility to ensure that their suppliers comply with the requirements of the Code of Conduct or a equivalent set of requirements, as well as evaluating and monitoring their supply chain's compliance.

## 1.6 SPEAK OUT

We advocate that every supplier should encourage their personnel to speak out or ask for advice if they see something that violates our Code of Conduct or if they are unsure how to apply it in a specific situation. Speaking out when you suspect a violation is an act of loyalty to HP Tronic Group and our values.

Speaking out when something does not feel right takes courage and can feel uncomfortable. Therefore, we handle your report under a duty of confidentiality and give you the opportunity to remain anonymous by using our whistle-blowing channel [visselblasare@hptronic.se](mailto:visselblasare@hptronic.se). All reports received are evaluated and an internal investigation conducted if necessary. The information you provide is kept confidential. Your privacy is paramount when you report a problem or suspected violation of HP Tronic Group's Code of Conduct and policies or the law. HP Tronic Group will not tolerate any retaliation against any suppliers' employees or business partners who express their concerns in good faith.

## 2. LEGAL COMPLIANCE

Suppliers must ensure awareness of and compliance with the relevant legislation and regulations applicable to their operations. This requirement is the basis for complying with the Code of Conduct.

### REQUIREMENTS

Suppliers must remain up to date and comply with national and regional legislation as well as relevant and applicable international regulations and conventions concerning the areas of the Code of Conduct. Suppliers must be aware of domestic regulations and whether compliance with such conflicts with international human rights.

#### GUIDE

Suppliers must be aware of and implement any legal requirements that are deemed relevant to their business and remain up to date on any relevant changes.

Suppliers must ensure that their business holds any statutory permits, licences and registrations related to their activities and ensure that they remain valid.

#### HOW WE VERIFY COMPLIANCE

We may ask suppliers about your work to ensure legal compliance within the following areas:

1. Health and Safety
2. Human Rights
3. Workers' rights and working conditions
4. Environment
5. Responsible sourcing of metals and minerals.
6. Business ethics
7. Customs and export control
8. Data Privacy

## 3. HEALTH AND SAFETY

HP Tronic Group has a zero vision for work-related accidents, illnesses and incidents. We expect suppliers to ensure that their employees are offered a safe and healthy work environment. Adequate health and safety policies and procedures shall be established and followed.

### REQUIREMENTS

Suppliers must provide a safe and healthy work environment and withtake all possible measures to prevent incidents and injuries. Suppliers must have an adequate, risk-based health and safety strategy, as well as provide relevant instructions and training to all employees. Employees shall have the right to be able to refuse a work situation if they believe with good reason that it poses an imminent and serious risk to their health or safety. All work premises, including, where applicable, accommodation and canteens, must be regularly inspected to maintain fire safety and hygiene standards. Where accommodation is provided, each employee shall be entitled to their own bed and a separate sleeping place for the gender with which they identify.

#### GUIDE

Suppliers must carry out regular health and safety risk assessments of their business, as well as evaluate the effectiveness of preventive and mitigating measures.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Effectiveness of fire alarms, adequate firefighting equipment, accessible escape routes and emergency exits, and that fire and evacuation drills are carried out regularly.
- Contingency plans and rescue procedures are rehearsed regularly, and appropriate control measures are in place to mitigate health and safety risks.
- Procedures and systems for managing, tracking and reporting work related injuries and diseases.
- Personal protective equipment and protective clothing are used, available free of charge, in working condition and suitable for the risks identified.
- Employees are trained in first aid and first aid equipment is readily available.
- Employees do not work under the influence of drugs or alcohol.
- Work premises are clean, well-lit, adequately ventilated and kept at acceptable temperatures and noise levels.
- Free access to clean drinking water, clean areas to eat meals, access to hygienic toilets and, where applicable, showers.



## 4. HUMAN RIGHTS AND WORKING CONDITIONS

Respecting human and labour rights is of great importance to HP Tronic Group. This includes treating employees fairly, with dignity and respect, and avoiding causing or contributing to violations of human rights and labour laws.

### 4.1 MODERN SLAVERY

Modern slavery is unacceptable to HP Tronic Group. Modern slavery can be described as bonded or forced labour, servitude, forced recruitment, slavery and human trafficking. Suppliers may not engage in any modern slavery-related activities, such as using aggression, coercion, psychological and/or physical threats, or abuse of power and deception to get a person to work. Furthermore, suppliers may not destroy or otherwise deny access to an employee's identity or immigration documents, nor fail to provide an employment contract.

#### REQUIREMENTS

Suppliers must not confiscate identification documents, withhold wages, impose abusive working conditions or create debt bondage. Suppliers must not participate in or exercise violence towards employees. Thereto, no form of forced or illegal labour may occur, including human trafficking, prison labour, child slavery, compulsory labour or other exploitation or abuse.

#### GUIDE

Suppliers must be aware of the risks of modern slavery in the industry and implement preventive measures towards zero tolerance for involvement in modern slavery. Suppliers must reject any business practices or decisions with suppliers, contractors or subcontractors that could lead to modern slavery.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Overtime work is agreement upon with the employees and performed in accordance with local laws.
- Employees have the right to leave their home and workplace freely during their free time.
- Employees are not required to hand over the original copies of personal certificates or identification documents, such as government-issued identification, passports, or work permits as a condition of employment.
- No practice of unlawful disciplinary methods or financial penalties, such as unfair or illegal salary deductions, withholding of wages or termination of benefits as a disciplinary measure.
- There are no deposits, fees, fines, loans, or reimbursement agreements that prevent employees from leaving their employment with a reasonable notice period are permitted.
- Reimbursement agreements are predictable, reasonable, and time limited.
- Migrant workers are treated fairly and on equal terms with local workers.

### 4.2 DISCRIMINATION, HARASSMENT AND HARSH OR INHUMANE TREATMENT

Discrimination in the workplace is unacceptable to HP Tronic Group. HP Tronic Group expects suppliers to make decisions about hiring, promotion, development and remuneration based on the employees' abilities and skills related to the work. These decisions must never be based on irrelevant factors such as gender, age, ethnic or national origin, religion, disability, sexual orientation, trade union membership or political affiliation.

#### REQUIREMENTS

Suppliers must respect the personal dignity, integrity and rights of each employee and must not tolerate any physical or psychological harassment or abuse, expressed verbally or non-verbally. Suppliers must prohibit downgrading behaviour, language and physical contact, i.e. sexual, obsessive, threatening, abusive or exploitative. Suppliers must not discriminate when hiring or during the employment, whether actively or passively on the basis of age, nationality or ethnicity, religion, political beliefs, sexual orientation, gender identity or expression, physical ability or any other characteristic protected by law or ILO conventions. Suppliers must prohibit public warnings and punishment systems.

#### GUIDE

Suppliers must promote a discrimination-free work culture. They must also strive for inclusive and diverse teams that can contribute to improvements.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Practices for recruitment, remuneration, hiring and non-discrimination, as well as whether equal opportunities are implemented and communicated.
- Mechanisms are in place to report and investigate discrimination or harassment without retaliation or revenge.

## 4.3 CHILD LABOUR

### REQUIREMENTS

Child labour is unacceptable to HP Tronic Group. No businesses may engage in, or benefit from, the use of child labour, in accordance with ILO Convention 138. Suppliers must work to prevent child labour in their operations and value chain to ensure legal working conditions for young workers. Employees must not be younger than 15 years of age (or 14 if permitted by national law). Young workers (under 18 years of age) are not allowed to perform work that is mentally, physically, socially or morally dangerous or that interferes with their compulsory school education. Young workers are not allowed to work night shifts.

#### GUIDE

Suppliers must maintain records of legal working age for all employees, such as copies of age verification documentation.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Work is carried out by employees who have reached the legal working age.
- There are systems in place to certify that no underage workers are employed.
- Young workers are given legal working conditions.

## 4.4 HUMAN RIGHTS DUE DILIGENCE

### REQUIREMENTS

Suppliers must be aware of and address any human rights issues that they encounter, contribute to, or that are directly linked to their operations, products, or services.

#### GUIDE

Suppliers must work proactively with human rights, e.g. perform due diligence to identify, prevent, mitigate and report the impact of the business on human rights.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Reviewing results regarding human rights upon completion of a due diligence investigation.

## 5. EMPLOYEE RIGHTS

### 5.1 WORKING HOURS AND REMUNERATION

HP Tronic Group expects suppliers to have reasonable working hours and remuneration that complies with statutory minimum requirements. By providing decent working conditions with adequate rest and leave, occupational injuries can be prevented and efficiency increased.

### REQUIREMENTS

Working hours, overtime, rest periods and leave must comply with relevant legal requirements or with the applicable collective agreement. Excessive overtime must not be the norm. Employees must be offered remuneration and benefits at least in accordance with the relevant legal requirements or applicable collective agreement. Employees must be informed of their terms of employment, including their rights and obligations, such as in a written employment contract. Suppliers are encouraged to provide family-friendly working conditions that provide a healthy work-life balance.

#### GUIDE

Suppliers must ensure legal working hours and proper verification of such. Suppliers must maintain accurate records of all salaries. Suppliers must provide all employees with a payslip that clearly states components of their salary in an understandable way, including overtime pay, hours worked, benefits, and other relevant services. Suppliers must inform employees of their terms of employment and keep records of this, such as copies of signed employment contracts.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Actual working hours are recorded, divided into normal working hours and overtime, unless otherwise specified.
- Employees are entitled to at least one day off per week and adequate rest between shifts.
- Wages are paid regularly, directly to the employee, at the agreed time and in full for the hours worked during the applicable period.
- Reviewing signed employment contracts and payslips.
- Employees take paid statutory holidays and legal statutory leave, including paid sick leave and that parental leave than can be used without any negative consequences.



## 5.2 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

HP Tronic Group supports freedom of association and the right to legally and peacefully associate, organise and bargain collectively. We encourage suppliers to engage with their employees to motivate and stimulate engagement in the workplace.

### REQUIREMENTS

Suppliers must recognise and respect the right of employees to freely socialise, organise and bargain collectively in accordance with the laws of the countries in which they are employed. Suppliers must recognise the importance of transparency, communication and direct engagement between employees and management. Suppliers must allow employees to appoint independent workers' representatives and to communicate openly with management regarding working conditions without fear of harassment, threats, punishment, interference, or retaliation.

### GUIDE

Suppliers must promote a work environment that ensures mutual constructive engagement between employees and management, avoiding unnecessary confrontation where possible, while engaging in dialogue with employees about working conditions.

### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Employees have the right to organise and bargain collectively.
- Employees have the right to appoint independent workers' representatives and to communicate with management.
- Workers' representatives are recognised by management.
- Review of collective agreements where applicable.

## 6. ENVIRONMENT

### 6.1 ENVIRONMENT

Protecting the environment, mitigating climate impact and creating circularity is of great importance to HP Tronic Group. The environmental impact of operations must be minimised and respect for the environment must be continually improved. This includes the protection of biodiversity and ecosystems as well as the sustainable use of resources. The environmental programs of our suppliers are of fundamental importance for HP Tronic Group to be able to fulfil its environmental responsibility towards customers and authorities. HP Tronic Group expects that suppliers' environmental policies, environmental aspects and applicable environmental requirements are identifiable and complied with. Based on this knowledge, active efforts to reduce environmental impact must be implemented and requested environmental information must be communicated.

### REQUIREMENTS

Suppliers must establish, implement and maintain a risk-based approach to minimise any negative environmental impact from their operations, products and services. HP Tronic Group encourages suppliers to work in accordance with Agenda 2030 and the UN's Sustainable Development Goals. This means controlling, measuring and documenting work aimed at minimising the environmental impact of their operations, particularly in the following areas:

- Greenhouse gas (GHG) emissions
- Circularity
- Waste
- Other emissions into the air, water and soil
- Energy consumption
- Water consumption

### GUIDE

Suppliers must perform environmental risk assessments of the business value chain as well as evaluate the effectiveness of preventive and mitigation measures. Suppliers must declare products' complete material contents, as well as information regarding waste and residual product management. Suppliers must select materials and resources that can be reused or recycled. Suppliers must take into consideration environmental aspects in product development with a life cycle perspective from raw material to the product's end of life. Suppliers work actively to replace hazardous chemicals with safer alternatives and optimise energy and resource efficiency.

### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Evidence of measurements and initiatives to minimise the negative impact of operations on the environment.





## 6.2 HAZARDOUS SUBSTANCES

Priority should be given to phasing out and avoiding hazardous substances and materials due to their environmental and health impacts. Meeting the many statutory and customer requirements requires robust management of chemical products.

### REQUIREMENTS

HP Tronic Group expects suppliers to identify and phase out hazardous substances in products and to ensure proper treatment of emissions.

#### GUIDE

Suppliers must have procedures and regulations that meet any legal requirements for waste management, handling and disposal of chemicals and other hazardous substances, as well as established treatment of emissions.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Effective procedures, chemical lists and risk analyses regarding the presence of hazardous chemicals and substances.
- Suppliers must comply with national or international waste legislation on chemical waste.

## 7. ETHICAL SOURCING OF MINERALS AND METALS.

In recent years, there has been an increasing international focus on tin, tantalum, tungsten and gold (“Conflict Minerals”) from the Democratic Republic of Congo and its neighbouring countries. A link has been shown between mineral trading by Western companies and the financial strength of armed groups that subject workers and indigenous peoples to violence and human rights violations.

HP Tronic Group promotes and supports human rights through the ethical sourcing of all minerals and metals and expects Suppliers to support the requirements of Regulation (EU) 2017/821 as well as to exercise reasonable care to ensure that their supply chain only imports minerals and metals from responsible sources.

### REQUIREMENTS

Suppliers of raw materials and components containing tin, tantalum, tungsten, gold (3TG) or cobalt that are part of the direct supply chain of HP Tronic Group products:

- Must comply with all applicable laws regarding responsible sourcing and conflict minerals (e.g. OECD Due Diligence Guidance).
- Must work towards responsible supply chains of minerals from high-risk and conflict-affected areas, including relevant reporting.
- Must work towards all deliveries of 3TG and cobalt in the supply chain being traceable to the smelter or refinery level.

#### GUIDE

Suppliers must be aware of the potential link between the production of raw materials and armed conflicts or serious human rights violations. Depending on their position in the supply chain, suppliers must check that raw materials are only sourced from responsible sources, or undertake reasonable steps to understand and, where necessary, influence their supply chains to implement responsible sourcing.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Performance of due diligence in accordance with the OECD Due Diligence Guidance, which we expect suppliers to cooperate with.
- Verification of systems or registers of minerals and metals’ country of origin to ensure that the origin complies with the guidelines set out in Regulation (EU) 2017/821.
- Reviewing the reasonableness of the results suppliers receive regarding enquiries on the country of origin when purchasing minerals and metals.
- Supplier’s commitment to provide information on conflict minerals as HP Tronic Group deems necessary.
- Smelters and refineries in the supply chain comply with the EU Commission’s list of responsible smelters, the Responsible Minerals Assurance Process (RMAP), or where applicable, are approved by other equivalent industry systems.



## 8. BUSINESS ETHICS

HP Tronic Group is committed to conducting business with high ethical integrity, including respecting competition laws, protecting individuals' rights to privacy, and complying with all customs and export control regulations. We expect the same from our suppliers.

### 8.1 ANTI-CORRUPTION

#### REQUIREMENTS

Suppliers' must refrain from all forms of corruption, extortion and bribery, and specifically ensure that any payments or other benefits offered or given to public officials, private sector employees or any other party comply with applicable local laws and international anti-corruption conventions.

#### GUIDE

Suppliers must establish processes to prevent corruption, for example by implementing an anti-corruption policy and by providing relevant training for their personnel.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Reviewing policies, related communication documents, training, and training needs.

### 8.2 COMPETITION LAW

HP Tronic Group expects suppliers to compete on the selling points of their products and services. The demonstration of any form of business courtesy must not be used to gain an unfair competitive advantage. In any business relationship, suppliers must ensure that sensitive information, including confidential and personal information, is handled correctly. The acceptance of any gift or form of corporate hospitality is permitted as long as it does not violate the rules or standards of the recipient's organisation and is consistent with reasonable market customs.

#### REQUIREMENTS

Suppliers must always negotiate agreements, regardless of the nature of the contract, in accordance with fair "competition principles" and not enter into any formal or informal contract or agreement intended to prevent or restrict competition. Contracts or agreements that violate applicable laws relating to competition and fair trade must not be established.

#### GUIDE

Suppliers must establish a competition law policy or undertake reasonable measures to verify that the need for competition law training is communicated to relevant employees.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Documentation that fair competition policies are established and implemented.
- Completion of relevant training by personnel.

### 8.3 PROTECTION OF PERSONAL DATA

#### REQUIREMENTS

Suppliers must comply with all applicable personal data protection legislation and only use personal data when it is lawful and necessary to fulfil legitimate business purposes.

#### GUIDE

Data Privacy Principles:

- Suppliers must inform individuals about when and why they are using their data.
- Suppliers may only use personal data that is strictly necessary to achieve their lawful and reasonable purposes.
- Suppliers may store personal data only for as long as necessary to fulfil such purposes and for as long as required by law.
- Suppliers must protect personal data by taking appropriate technical and organisational security measures and notifying relevant authorities of any personal data breach, if legally required.

#### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Reviewing suppliers' relevant documentation demonstrating that their organisation has adopted such data privacy principles.



## 9. CUSTOMS AND EXPORT CONTROL

Suppliers must ensure that their business practices comply with applicable export control laws and regulations regarding imports and exports. Suppliers must provide truthful and accurate information regarding export restrictions and ensure compliance with these rules and regulations.

### REQUIREMENTS

Suppliers must maintain and share accurate trade data and documents related to their products. Suppliers must comply with local laws and international sanctions regulations and not engage in, or cause HP Tronic Group to engage in, any form of sanctions violations.

If false information as described above is provided by a supplier and a violation of any applicable export control legislation subsequently occurs, HP Tronic Group will hold the supplier liable in the event that any deliveries have been shipped to prohibited countries or recipients. The consequences for the supplier can be significant in terms of fines (or worse) imposed by the relevant authorities.

### GUIDE

Suppliers must implement trade compliance procedures and provide relevant training for their personnel.

- Suppliers must maintain and submit relevant and valid information and documentation about their products, such as: HS tariff codes, export control classification status, country of origin and supporting documentation for both non-preferential and preferential origin for free trade purposes.
- Suppliers must maintain the necessary records and evidence.

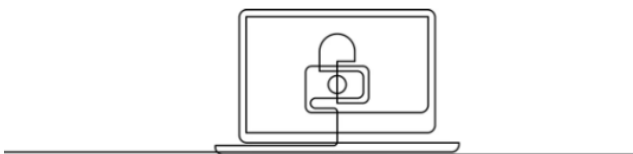
### HOW WE VERIFY COMPLIANCE

Checkpoints may include:

- Review of the supplier's trade compliance procedures.
- Review of submitted information and documentation demonstrating legitimate trade.
- The supplier must communicate necessary evidence to ensure the validity of the trade data and other information provided.

## 10. DATA PRIVACY

HP Tronic Group expects suppliers to handle sensitive information properly, including confidential, proprietary and personal information. Such information may not be used for any purpose other than that for which it was provided. Suppliers must not use social media in a manner that may damage HP Tronic Group's brand and reputation. Suppliers must maintain a secure IT environment to protect and respect property owned by HP Tronic Group.



# SUPPLIER ACCEPTANCE

I/we, the undersigned authorised representative(s) of the Supplier, hereby certify on behalf of myself/ourselves and the Company that the Supplier and its subsidiaries accept and comply with the Supplier Code.

Full Company Name: \_\_\_\_\_

Corporate ID number: \_\_\_\_\_

Location: \_\_\_\_\_

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Signature: \_\_\_\_\_

