

# TRADE PARTNER CODE OF CONDUCT

## 1 INTRODUCTION AND AIMS

ScioTeq values integrity, compliance with laws and profound ethical behavior in conducting its business. The Trade Partner Code of Conduct represents the fundamental expectations we have for our suppliers, distributors, agents and other trade partners and those who work for and with them, including but not limited to subcontractors, employees, and consultants (hereinafter jointly referred to as "Trade Partners").

ScioTeq continually assesses its ethical program and may modify this Trade Partner Code of Conduct ("Code") from time to time, of which the most recent version is available on the ScioTeq website ([www.sciopeq.com](http://www.sciopeq.com)).

As this Code outlines a set of best practice expectations and does not include all regulations, policies and procedures, ScioTeq expects its Trade Partners to maintain at all times the highest standards of ethics and integrity, comply with laws, regulations and/or standards and honor its contractual obligations.

This Code forms a fundamental part of ScioTeq's Trade Partner relationship management. ScioTeq is counting on you to foster a highly demanding ethical and legal behavior to build and maintain a long-term and successful cooperation.

Throughout this Code " ScioTeq ", "we", "us" and " our " refer to ScioTeq BV and each of its subsidiaries and affiliates.

## 2 HUMAN AND LABOR RIGHTS

### a. RESPECT - EQUAL OPPORTUNITIES – NON-DISCRIMINATION

We expect our Trade Partners to treat people with respect, dignity and to encourage and promote diverse opinions, freedom of political and trade union association and foster an open and free ethical culture. The Trade Partners should provide equal employment opportunity to all employees and applicants for employment, without any discrimination such as on the basis of age, race, nationality, social or ethical descent, gender, physical disability, sexual preference, religion, political reference, or union membership.

### b. WAGES AND HOURS

The Trade Partners ensure that all their employees receive at least the legally mandated minimum wages and benefits and shall be paid in addition for regular hours or work, for any overtime at such premium rate as legally required.

Working conditions, working time and compensation must be complying with the relevant laws and standards applicable in the country where the Trade Partners operates.

### c. CHILD LABOR – FORCED LABOR – HUMAN TRAFFICKING

The Trade Partners ensure that neither child labor, slavery nor human trafficking is used within its organization/operations or within its supply chain and shall comply with all applicable laws prohibiting Child labor, Slavery and Human Trafficking.

### d. HEALTH AND SAFETY - HARRASMENT

The Trade Partners shall provide a healthy and safe work environment in compliance with applicable regulations regarding Health and Safety and shall ensure that their employees are at all times having the possibility to work in an environment that is free from physical, psychological, and/or verbal harassment or other abusive conduct.

## 3 QUALITY - ENVIRONMENT

a. QUALITY

The goods and services supplied by Trade Partners to ScioTeq will be of good quality and free from defects in workmanship, material, and design.

The Trade Partners shall ensure that their operations/organization, products and services meet the quality standards required by ScioTeq and shall have in place quality assurance processes to identify defects and implement appropriate and swift corrective actions, meeting ScioTeq's quality requirements and standards.

b. COUNTERFEIT PARTS

The Trade Partners shall ensure not to provide second hand, counterfeit and/or replica products to ScioTeq and shall develop, implement and maintain methods and processes appropriate to detect and prevent/exclude the introduction of counterfeit parts and materials into the products to be supplied ScioTeq.

c. ENVIRONMENTAL RESPONSIBILITY

Trade Partners shall meet all regulatory obligations regarding environmental compliance and shall commit to minimize its impact on the environment by developing cleaner processes, energy and resource efficiency, limitation of CO<sub>2</sub>, waste management and recycling, responsible water management.

## 4 ANTI CORRUPTION AND ANTI-BRIBERY

a. ANTI-CORRUPTION LAWS

The Trade Partners shall comply with all applicable anti-bribery and anti-corruption laws, directives and regulations, such as but not limited to US Foreign Corrupt Practices Act, France's Loi Sapin II, UK Bribery Act 2010.

We require the Trade Partners, directly or indirectly, to refrain from offering, promising, giving, paying or authorizing to offer, promise, give or pay, anything of value to any public official (including employees of and persons acting on behalf of a public organization, government or government-owned/controlled company), political party or party official or candidate for public office as an inducement or reward to obtain or retain business, a business advantage or favorable regulatory treatment. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action that the government official is already obligated to perform, even in regions where such facilitating payments may not violate the local law.

ScioTeq requires its Trade Partners to prevent and detect corruption throughout its operations, supply chain and business arrangements, such as but not limited to subcontracts, partnerships, hiring of intermediaries such as agents and consultants.

b. ILLEGAL PAYMENTS – GIFTS - HOSPITALITY

Our Trade Partners shall compete on the merits of their products and services.

Our Trade Partners shall not offer nor receive any illegal payment, intended to exert undue influence or improper advantage, from any customer, supplier, agent, representative or others, even if such activity may not violate local law.

Hospitality, like meals, the exchange of business courtesies, gifts may not be used to gain unfair competitive advantage or exercise improper influence and shall therefore be in compliance with any applicable laws and regulations with respect thereto and consistent with all reasonable market practices.

## 5 TRADE PRACTICE

a. EXPORT/IMPORT

Trade Partners shall ensure compliance with all applicable laws, directives and regulations governing the import and export of parts, components, products and technical data and to provide correct and accurate information in line with economic sanctions and embargoes in effect.

b. CONFLICT MINERALS

Trade Partners must comply with any applicable laws and regulations regarding conflict minerals and assist us in meeting our obligations under law and regulation, upon request.

Trade Partners shall identify (in their supply chain) with adequate measures and due diligence if the products, components, parts or materials supplied contain minerals (tin, tantalum, tungsten and gold) originating from conflict regions.

c. PROCUREMENT INTEGRITY

Trade Partners shall maintain the integrity of our procurement and acquisition processes. Any confidential or proprietary information obtained during the business relationship, even information related to a competitor, shall not be improperly used.

## **6 COMPETITION - CONFLICT OF INTEREST - INSIDER TRADING**

### **a. COMPETITION**

Our Trade Partners shall at all times comply with the applicable Competition and Anti-trust laws and regulations.

### **b. CONFLICT OF INTEREST**

In case an actual or potential conflict of interest arises when dealing with us, even if the conflict is of a personal nature, the Trade Partner shall notify us in due course in order to allow us to assess the situation and to take the appropriate actions.

## **7 CONFIDENTIALITY – DATA PROTECTION - IPR – CYBERSECURITY**

### **a. CONFIDENTIALITY**

Our Trade Partners shall maintain the confidentiality of all proprietary or confidential information entrusted to them by ScioTeq or obtained by them in the course of doing business with us, except when required by law, regulations or legal proceedings or when disclosure is authorized. Any information should only be used for the business purposes for which it was provided.

### **b. DATA PROTECTION**

Trade Partners shall comply with the European Regulation 2016/679 relating to the processing of personal data and any regulation relating to the processing of personal data disclosed in the course of the business relationship with ScioTeq.

### **c. IPR**

All Intellectual Property Rights shall be respected by the Trade Partners.

### **d. CYBERSECURITY**

We expect the Trade Partners to have in place and duly maintain risk-based cybersecurity programs designed to mitigate emerging threats to their information systems in order to safeguard and protect the information entrusted to and/or generated or developed by them in the performance of our business relationship from unauthorized access, destruction, use, alteration, deletion or disclosure.

## **8 MONITORING - REPORTING - CONSEQUENCES OF VIOLATION**

In order to ensure compliance with the Trade Partner Code of Conduct, you shall keep record of all relevant documentation, and provide so to us upon request.

Monitoring may take the form of self-assessments, certification, audits and follow up of remediation plans. ScioTeq shall take a risk-based approach in assessing Trade Partner's compliance with the requirements of this Code and shall assist the Trade Partner in addressing gaps identified.

Our Trade Partners are encouraged to report, even anonymously and without fear of retaliation, actual or potential ethical or legal concerns to [be.hotline@scioteq.com](mailto:be.hotline@scioteq.com).

In the event of a violation of this Code, the applicable laws, or other policies and procedures, we may request the Trade Partner to take corrective actions to remedy the situation.

We however reserve our right to terminate our relationship under the terms of the existing agreement with the Trade Partner. In case of a violation of law or regulation, we might be required to report such violation to the proper authorities.

Approved by ScioTeq's Board of Directors  
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