

# Supplier Code of Conduct Policy



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## I. PURPOSE

- 1.1 The purpose of this Supplier Code of Conduct (**Code**) is to articulate our expectations and requirements for all DexKo Global Inc suppliers (including subcontractors) providing goods and services to DexKo, Dexter, AL-KO Vehicle Technology Group and its subsidiaries (**we, us, our**).
- 1.2 All of our suppliers have a responsibility to monitor compliance with this Code, to notify us of any breaches and take reasonable steps to address, remedy and prevent repetition of any breach or possible breach of this Code.
- 1.3 We reserve the right to undertake, either directly or via a third party, audits, due diligence and risk assessments to verify compliance with our Code and expect our suppliers to cooperate and provide supporting evidence as we may reasonably require to monitor and review compliance.

## II. VENDOR CONDUCT

- 1.4 We seek to work with businesses whose values match our own. We require all our suppliers to comply with all applicable laws and to meet the expectations and requirements set out in this Code across all areas of their business. Compliance with such laws, expectations and requirements is a material consideration for us in assessing every aspect of our supplier relationships.

## III. USE OF THIS CODE

- 1.5 All new and existing suppliers are required to comply with this Code and demonstrate their commitment to doing so.
- 1.6 Suppliers are also required to address the expectations and requirements set out in this Code with their own supply chain.
- 1.7 When a supplier does not meet our requirements, corrective action plans will be established and monitored for progress. We will terminate our relationship with suppliers that repeatedly and knowingly violate our Code.
- 1.8 Our suppliers are expected to adopt a management system to carry out the responsibilities in this Code. The management system must be designed to:

- (1) ensure executive level accountability for compliance;
- (2) identify and mitigate operational risks;
- (3) facilitate continual improvement; and

### Who does this code apply to?

All new and existing suppliers are required to comply with this Code and demonstrate their commitment to doing so.

- (4) provide stakeholders and workers access to an easily accessible and comprehensible grievance mechanism to raise concerns confidentially without fear of retaliation.

#### **IV. ETHICS, ANTI-BRIBERY AND CORRUPTION**

Our suppliers must:

- (5) conduct their business with the highest degree of integrity.
- (6) act in accordance with all national and international competition and anti-trust laws and regulations and not to engage in any anti-competitive practices.
- (7) comply with all applicable laws relating to the prevention of bribery, corruption, fraud, money laundering, extortion, embezzlement, tax evasion or similar or related activities.
- (8) seek to identify and report any conflicts of interest promptly, be it competing personal or professional interests. Our suppliers must avoid even the appearance of conflicts of interest in their work with us.
- (9) maintain a policy reasonably assuring that any goods they provide to us, or goods they use in providing services to us, do not benefit groups that commit human rights abuses, and must provide due diligence materials to us upon request.
- (10) not directly or indirectly trade with or include in their supply chain any goods or services sourced from, sanctioned persons, countries or organisations in accordance with all relevant sanctions laws, including local or regional sanctions as mandated by the government for the relevant jurisdiction applicable to us.
- (11) respect intellectual property rights and act in a manner protecting intellectual property rights.
- (12) comply with all applicable privacy, data protection and cybersecurity laws and regulations.
- (13) have an appropriately documented and tested cyber security incident and breach management plan that meets regulatory reporting obligations in case of an incident (e.g. data loss, privacy breach, cyber incident).
- (14) safeguard personal information, confidential information and trade secrets to which they have access in connection with their provision of goods and/or services to us.

#### **V. NON-DISCRIMINATION**

- (15) Our suppliers must comply with all applicable anti-discrimination laws within their own workplace, including in recruitment practices.

- (16) Without limiting the above, our suppliers must not discriminate, for example based on national and ethnic origin, social origin, health status, race, colour, age, gender, gender identity, gender expression, sexual orientation, marital status, caste, disability, genetic information, medical condition, pregnancy, religion, ideology, political affiliation or union membership.

## **VI. HEALTH AND SAFETY**

- (17) Our suppliers must comply with all applicable health and safety laws.
- (18) Our suppliers must take necessary precautionary and protective measures against accidents and adverse health impacts that may arise in connection with the supplier's activities by establishing and implementing appropriate occupational safety systems.

- (19) Our suppliers must provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage and eating facilities. If our suppliers provide workers with residential facilities, those facilities will be clean and safe, with adequate personal space, entry and exit privileges, emergency egresses, adequate lightning, heating and ventilation and hot water.



- (20) Our suppliers must train and instruct their workers on occupational health and safety obligations.

## **VII. LABOR**

- (21) Our suppliers must ensure workers have freely chosen employment with no form of forced, slave, bonded or indentured labor. Suppliers must not unreasonably restrict workers' freedom to move into, out of or at working facilities.
- (22) Our suppliers must ensure that all workers are employed on a voluntary basis. All employment must be able to be terminated by the worker within a reasonable period of time.
- (23) Our suppliers must ensure that workers do not perform work that is likely to jeopardise their mental or physical health or safety.
- (24) Our suppliers must not employ persons no younger than 15 and in accordance with local laws and regulations and must never support the use of child labor, except as part of an official government approved educational youth training scheme.

- (25) Our suppliers must not permit harassment, abuse, torture, corporal punishment or inhumane treatment.
- (26) Our suppliers must prevent excessive physical and mental fatigue and comply with all applicable laws and regulations related to maximum working hours and minimum days of rest.
- (27) Our supplier's workers must be permitted to associate freely, bargain collectively, strike and seek representation in accordance with local laws.
- (28) Our suppliers must pay workers a living wage, at least equal to the minimum wage as laid down by the applicable law.
- (29) Suppliers must not provide us with, or use on any of our site, any products listed in the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor as updated from time to time.

## **VIII. HUMAN RIGHTS**

- (30) Our suppliers, whether directly or through their supply chain, must comply with all applicable human rights related laws in respect of their workers.
- (31) Our suppliers must notify us if they, or their subcontractors or suppliers, have been convicted, had a notice served upon them, or an order made against them for infringement of modern slavery laws anywhere in the world.
- (32) Our suppliers must have in place adequate procedures to identify, prevent, mitigate and account for modern slavery and other human rights impacts in their operations and supply chains.
- (33) Our suppliers must respect the rights of Indigenous peoples and other communities.
- (34) Our suppliers must not allow the unlawful eviction and deprivation of land, forests and waters.
- (35) Our suppliers must ensure that all security forces are properly trained, instructed and controlled, so that they do not endanger the life or safety of any person or prevent workers from their rights uphold the freedom of association.

## **IX. ENVIRONMENTAL AND SUSTAINABILITY**

Our suppliers must:

- (36) comply with all applicable environmental laws, including international conventions in their respective current version (e.g. the Basel, Stockholm or Minamata Convention), and notify us if they cause, or their subcontractors or suppliers cause, pollution or any other

environmental incident that is likely to give rise to a breach of environmental laws or significant reputational damage.

- (37) take reasonable steps to ensure that they do not cause harmful soil changes, water pollution, air pollution, harmful noise and radiation emissions or excessive water consumption;
- (38) reduce consumption of natural resources, in particular energy and water.
- (39) monitor, treat prior to release and reduce greenhouse gas emissions and other hazardous air emissions, wastewater and waste generated from its operations.
- (40) accurately and transparently account for their greenhouse gas emissions using widely accepted greenhouse gas accounting standards, and, where required, report to us annually on the Scope 1 and Scope 2 greenhouse gas emissions associated with the procured goods and/or services.

## **X. QUESTIONS & CONCERNS**

If you have a question or concern about proper conduct or the content of this Code, you should immediately raise the issue with DexKo, Dexter, or AL-KO Vehicle Technology Group Sourcing Manager or refer to the whistle-blowing process set out in *Whistle-blower policy (0013)*.

**Who can I contact if there is a concern about proper conduct?**

*You can contact the compliance committee at [Compliance@DexKo.com](mailto:Compliance@DexKo.com) or report an issue through the Company's hotline, [DexKo.ethicspoint.com](http://DexKo.ethicspoint.com).*

**XI. ACKNOWLEDGEMENT OF RECEIPT CODE OF CONDUCT FOR SUPPLIERS**

I, on behalf of \_\_\_\_\_ *(Name Supplier)* hereby confirm and acknowledge to follow the guidelines and principles of the **DexKo Global Inc** Code of Conduct for Suppliers and ensure, that the management, employees, agents, representatives and suppliers of \_\_\_\_\_ *(Name Supplier)* are aware of these guidelines and principles and comply with them, when preparing and submitting offers for **DexKo Global Inc**, for the procurement of goods and services for **DexKo Global Inc** and during the execution of all agreements concluded with **DexKo Global Inc**.

**Contact details Supplier:**

.....  
Printed Name

.....  
Department/Function

.....  
Signature

.....  
Company Stamp