



Supplier's Code of Conduct Policy

Abstract

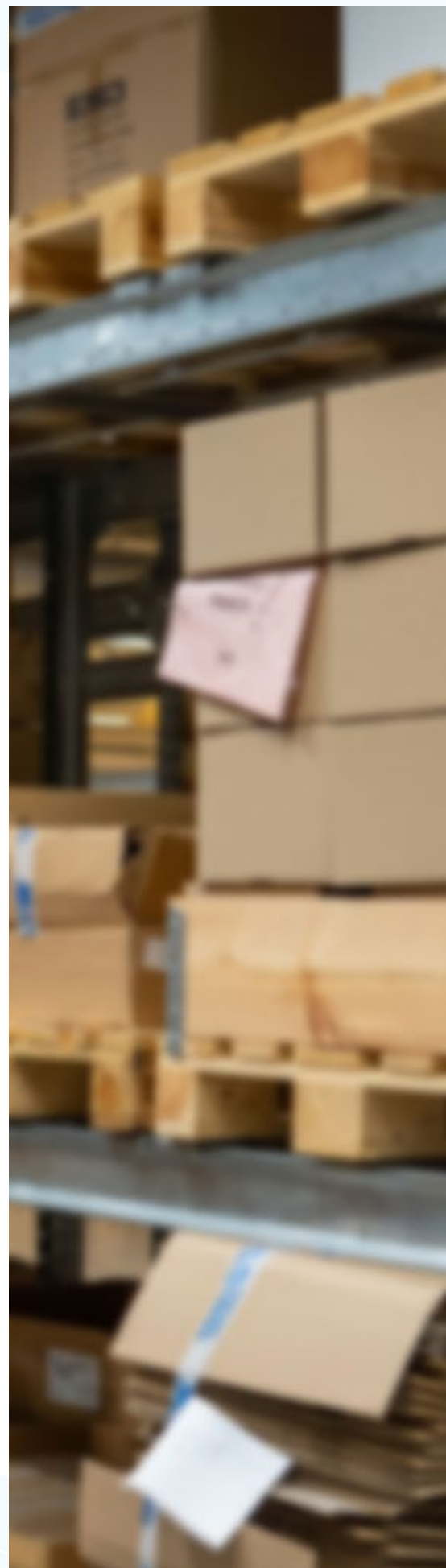
This document outlines the Code of Conduct Policy and Guidelines for Suppliers to the Syntronic Group and its related companies.

Purpose

The main purpose of the Syntronic Group's Code of Conduct is to ensure that Suppliers protect human rights, promote fair employment conditions, maintain safe working conditions, responsibly manage environmental issues, and uphold high ethical standards

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1 Introduction to the Code of Conduct Policy

The Syntronic Group has earned trust and reputation for corporate trustworthiness around the world, based on conducting business with integrity and in compliance with the laws and regulations governing its activities.

Therefore, it's important that the Suppliers of Syntronic Group adhere to the same principles. Success in business for Syntronic Group depends on building and maintaining the trust of customers, employees, governments and the general public.

The Syntronic Supplier Code of Conduct Policy is based on the Ten Principles of the UN Global Compact. For more specific information and definitions, see unglobalcompact.org.

1.1 Document Information

1.1.1 Language

The original language of this document is English. If translated into other languages, the English version shall take precedence in case of disputes.

1.1.2 Periodic review

The Syntronic Group CEO is responsible for ensuring that a review of the document is performed every year.

2 General Supplier Principles

As a supplier to The Syntronic Group, you are expected to:

- Comply with the laws and regulations of each country in which you operate.
- Demonstrate and promote your commitment to responsible business practices in your policies, decisions, and activities.
- Integrate the principles of this policy into your ways of working.
- Give access to necessary premises and documents to verify adherence to this Code of Conduct, after being given reasonable notice.

By adhering to these principles, suppliers help maintain the integrity and ethical standards of the Syntronic Group.



3 Business Ethics

3.1 Accounting

All financial transactions by suppliers to Syntronic Group shall be reported in accordance with generally accepted accounting practices. The accounting records must show the nature of all transactions in a correct and non-misleading manner.

3.2 Taxation

The Suppliers of Syntronic Group shall comply with the tax laws and regulations of each country in which they operate. Where or if tax laws do not give clear guidance, prudence and transparency shall be the guiding principles.

3.3 Anti-corruption

The Syntronic Group maintains a zero-tolerance policy toward corruption. As a supplier to the Syntronic Group, you are expected to adhere to the same high standards. Suppliers must not engage in or endorse any corrupt activities. They must not offer any rewards or benefits to Syntronic Group representatives, customers, potential customers, sub-contractors, governments, or any representatives of such entities, in violation of applicable laws or stricter business practices, to obtain or retain business or gain any improper advantage.

Additionally, suppliers must ensure that their employees do not accept payments, gifts, or other forms of reimbursement from third parties that could influence or appear to influence their objectivity in business decisions.

3.4 Anti-bribery

The Syntronic Group operates a zero-tolerance policy toward bribery. As a supplier to the Syntronic Group, you must not offer or accept gifts, benefits, reimbursements, or entertainment to or from a third party that would constitute a violation of laws or that could affect, or appear to affect, your professional judgment in the performance of work or duties for Syntronic or a third party.

Suppliers must not, directly or indirectly, demand or accept, offer or give any kind of bribe, kickback, or any other unlawful or unethical benefit to employees, or other representatives or associates, of Syntronic or any third party. This also includes any kind of facilitation payments demanded by public officials to speed up or secure the performance of routine government actions. Any such offer or proposed arrangement must be reported immediately through Syntronic Group's designated reporting contacts and channels.

3.5 Money laundering

The Suppliers of Syntronic Group shall not accept, facilitate or support money laundering.

3.6 Conflict of Interest

The Suppliers' employees' private interests shall not influence their judgement or actions in performing their duties as representatives of the Suppliers to the Group.

3.7 Fair Competition Practices

The Suppliers of Syntronic Group shall compete in a fair manner and with integrity.

3.8 Company property and resources

If you, as a supplier to Syntronic, are granted access to our facilities you are expected to use The Syntronic Group's property and resources solely for business objectives related to the cooperation with Syntronic. These assets must not be used for personal gain, fraudulent purposes, or any other inappropriate manner.

3.9 Intellectual Property (IP)

Intellectual property (IP) includes inventions, ideas, designs, creative works, trademarks, patents, trade secrets, know-how, and other proprietary information protected by law. All suppliers and business partners must respect the intellectual property rights of Syntronic Group and its partners, as well as those of third parties.

IP must only be used, shared, or disclosed in accordance with applicable laws, internal policies, and contractual obligations. Unauthorized use, copying, distribution, or disclosure of IP is strictly prohibited and may result in disciplinary or legal action.

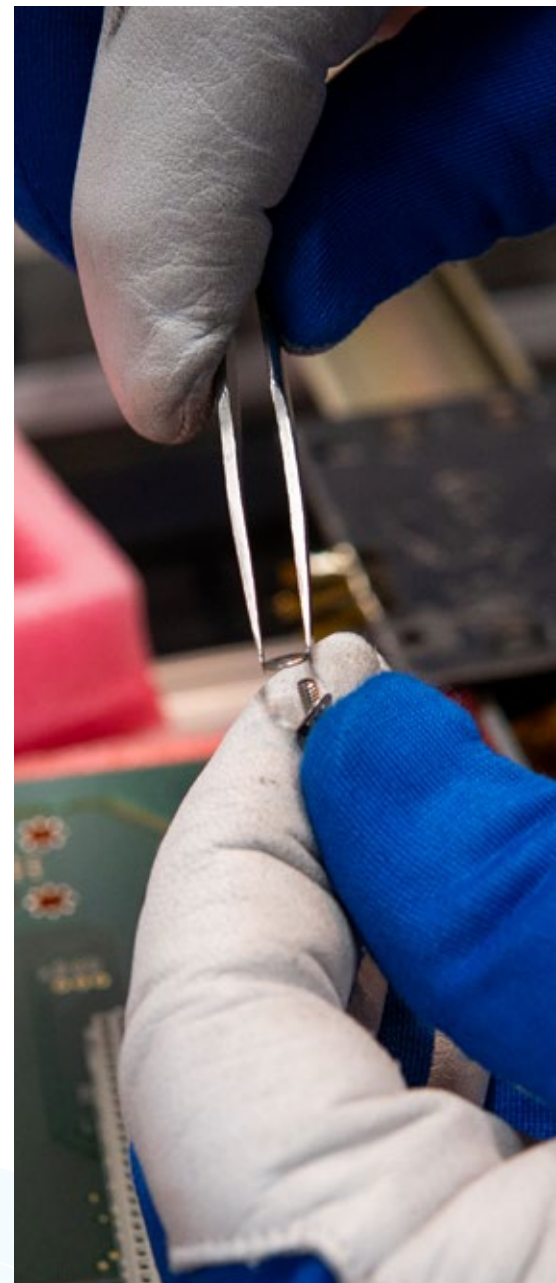
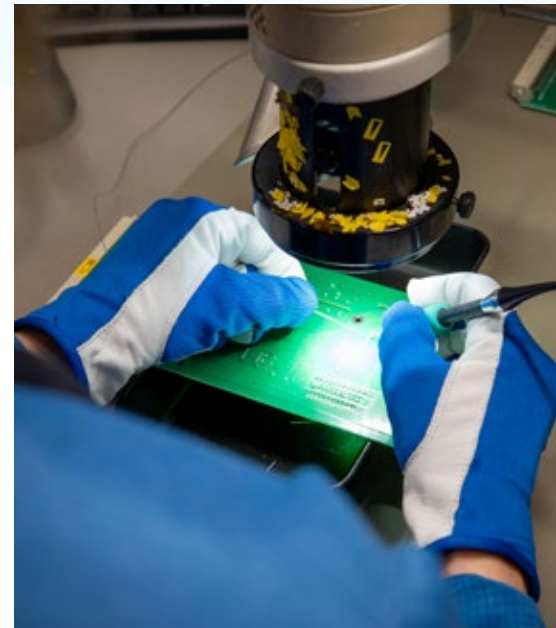
3.10 Conflict Minerals

As a supplier to The Syntronic Group, you are expected to ensure that your sourcing of minerals does not directly or indirectly finance armed conflict or benefit armed groups. You must exercise due diligence on the source and chain of custody of conflict minerals in your supply chain, adhering to internationally recognized standards such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Transparency in reporting and cooperation with audits are required to verify compliance.

3.11 Information Protection

Syntronic Group expects the Suppliers to handle sensitive information, as confidential and personal information, with care and in accordance with applicable laws and contract obligations. Information must not be used for any other purpose than it was provided for and must not be disclosed to any unauthorized parties or used for personal gain. Suppliers are required to implement appropriate measures to prevent unauthorized access, use, or disclosure of sensitive information.

Any actual or suspected breach of information security or confidentiality must be reported to Syntronic Group immediately.



3.12 Cyber Security

Cyber security is very important to protect information and ensure uninterrupted operations. Suppliers must implement strong cyber security practices, including threat detection, prevention, incident response, and continuous improvement. Protecting confidential information, customer data, and critical systems is essential to maintain trust and avoid disruptions.

By adhering to cyber security requirements, suppliers contribute to a secure business environment, safeguard sensitive data, maintain operational resilience, and support a robust supply chain.

4 Labour Standards

4.1 Human rights

The Suppliers of Syntronic Group shall support and respect the protection of internationally proclaimed human rights. It is essential that your operations do not contribute to human rights abuses.

Suppliers help to ensure that the Syntronic Group upholds its commitment to ethical and responsible business practices by adhering to these principles.

4.2 Forced labour

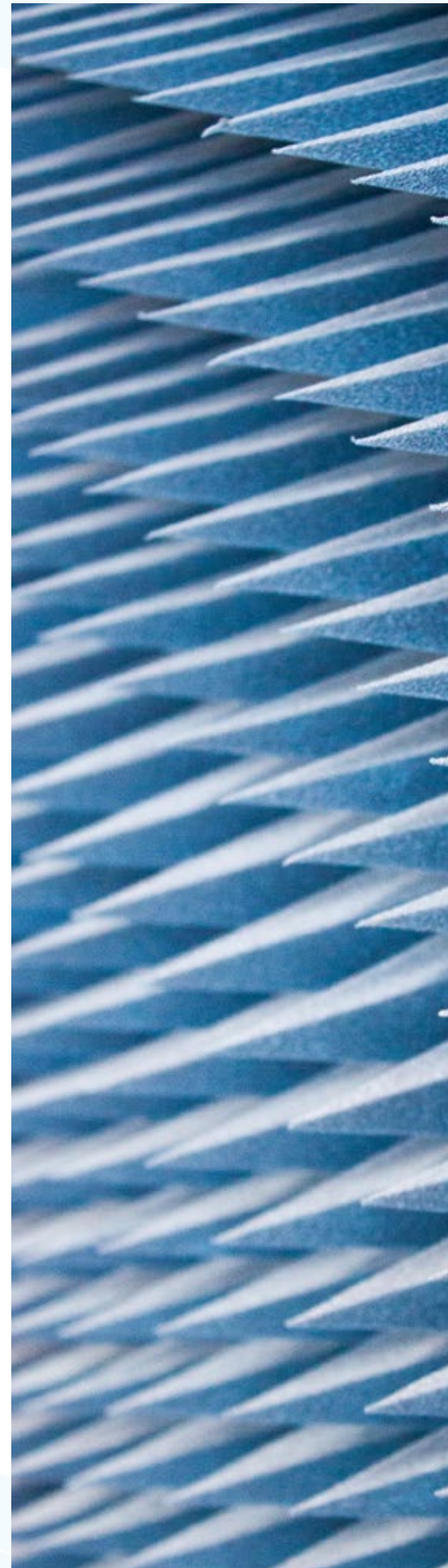
Suppliers of the Syntronic Group must not engage in, or support forced, bonded, or compulsory labour. Suppliers must not require any form of deposit or confiscate identification papers from employees. Employees must be free to leave their employment after giving reasonable notice, as required by law and contract.

4.3 Child labour

Suppliers of the Syntronic Group must ensure that child labour is not tolerated. The minimum employment age must be the age of completion of compulsory schooling, but never less than 15 years.

4.4 Young Workers

Suppliers must not employ individuals under the age of 18 for hazardous work, which includes any work that could harm their health, safety, or morals. Suppliers should also support the education of young workers by ensuring that their work does not interfere with their education.





4.5 Freedom of association

As a supplier to the Syntronic Group, you must respect the right of all employees to form and join, or not to join, an association to represent their interests as employees, to organize, and to bargain collectively or individually. Suppliers must respect recognized unions and equally respect an employee's right to refrain from joining a union. Additionally, suppliers must notify employees' representatives and relevant government authorities of major changes in operations as required by law.

4.6 Non-Discrimination

As a supplier to the Syntronic Group, you must ensure that all employees have equal opportunities based on competencies, experience, and performance, regardless of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background, or ethnic origin. It is crucial that all employees are treated with respect. Discrimination, physical or verbal harassment, or any illegal threats are not tolerated.

By adhering to these principles, suppliers help maintain a fair and respectful working environment in line with the Syntronic Group's values.

4.7 Workplace practice

As a supplier to the Syntronic Group, you must ensure that the necessary conditions for a safe and healthy work environment are provided for all employees. This includes adhering to all relevant health and safety regulations and implementing best practices to prevent workplace injuries and illnesses.

4.8 Working hours and compensation

Suppliers of the Syntronic Group must comply with applicable laws, agreements, and industry standards on working hours and compensation.

The normal work week should not exceed 48 hours. Hours worked beyond the normal work week should be voluntary, unless exceptional circumstances and/or, if legal, certain conditions require extra hours. Other than in such circumstances, a work week should not exceed 60 hours, and employees must be provided with at least one day off in every seven-day period, interpreted as twenty-four consecutive hours.

Exceptional circumstances include short-term business demands and natural disasters. Pay and terms must be fair and reasonable, complying at a minimum with applicable laws or industry standards, whichever is higher. Deductions from base salaries/wages as a disciplinary measure are not permitted.

5 Environment and Climate

5.1 Environmental Responsibility

As a supplier to The Syntronic Group, it is mandatory to comply with all applicable environmental laws and regulations. Suppliers are expected to apply the precautionary principle to environmental risks. The Suppliers should act with caution and take preventive measures to minimize potential negative impacts on the environment, such as implementing sustainable practices in the operations, reduce waste, conserve energy, and minimize the use of hazardous materials.

Suppliers should continuously assess and mitigate the environmental impact of their products and processes and maintain transparency in their environmental practices. Suppliers are encouraged to use the most sustainable available technologies to reduce the environmental footprint.

5.2 Climate Change and Net Zero

Syntronic Group is recognizing the importance of addressing climate change and is dedicated to integrating sustainable practices throughout our operations and supply chain. We expect our suppliers to share in this commitment by actively participating in efforts to reduce greenhouse gas emissions, minimize environmental impact of your products and services, and promote resource efficiency. Suppliers are encouraged to implement strategies that mitigate climate risks, enhance energy efficiency, and transition to renewable energy sources.

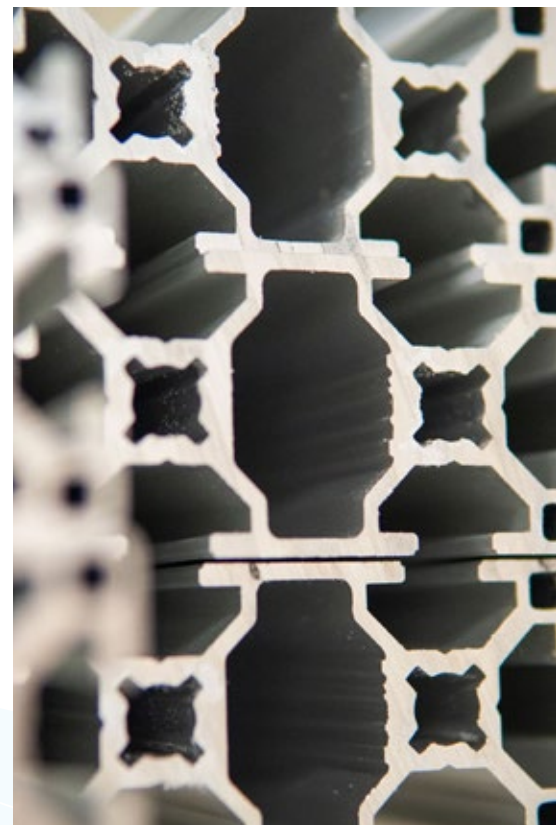
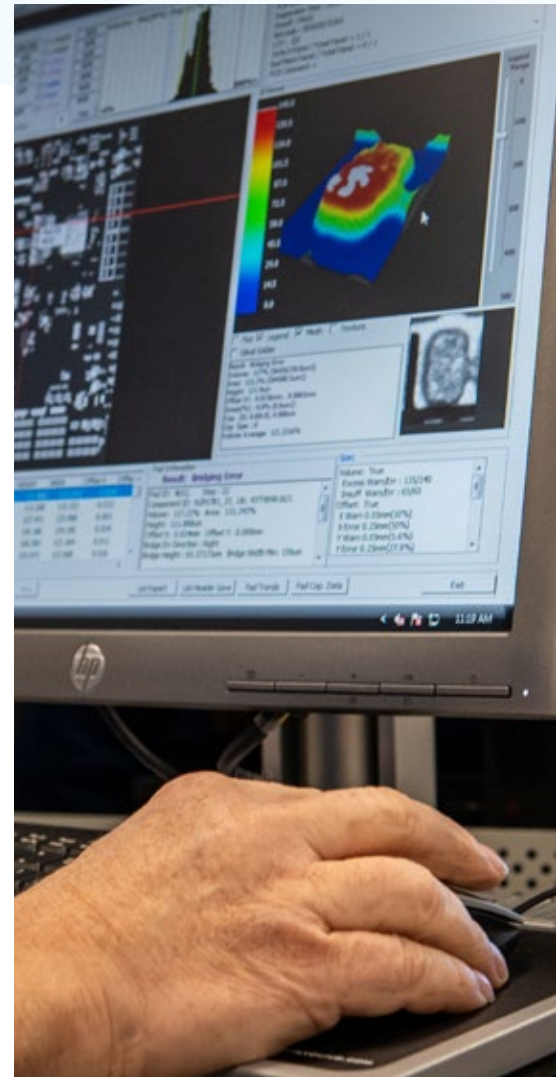
Suppliers are integral to our Net Zero by 2050 strategy. By aligning operations with sustainable practices, creating carbon emission reduction plans, and further collaboration, we collectively combat climate change.

6 Code Governance and Reporting

6.1 Responsibility for compliance

As a supplier to the Syntronic Group, it is your responsibility to implement this policy and inform your employees of their rights, duties, and responsibilities. You must demonstrate the content and spirit of this document within your organization. All employees must comply with local laws and this Supplier Code of Conduct.

If a supplier fails to meet our expectations as set out in the Supplier Code of Conduct, the general approach is to encourage improvement. Critical deviations, as law violations, will not be tolerated and may result in disciplinary actions, up to and including termination of the business relationship and legal proceedings. Repeated unwillingness to make improvements, may also jeopardize the supplier's business relationship with Syntronic. Deviations from this policy may be approved only by AB Syntronic's Board of Directors.



6.2 Report on violation of the Code of Conduct

As a supplier to the Syntronic Group, you are required to report violations of the requirements in this Code of Conduct. You are also encouraged to report suspected violations of this Code of Conduct. Reports should be made to your direct superiors or the managers of your superiors, to the Supplier's Syntronic Group contact, or report anonymously to the Syntronic Group's external whistleblowing function without any risk of retaliation.

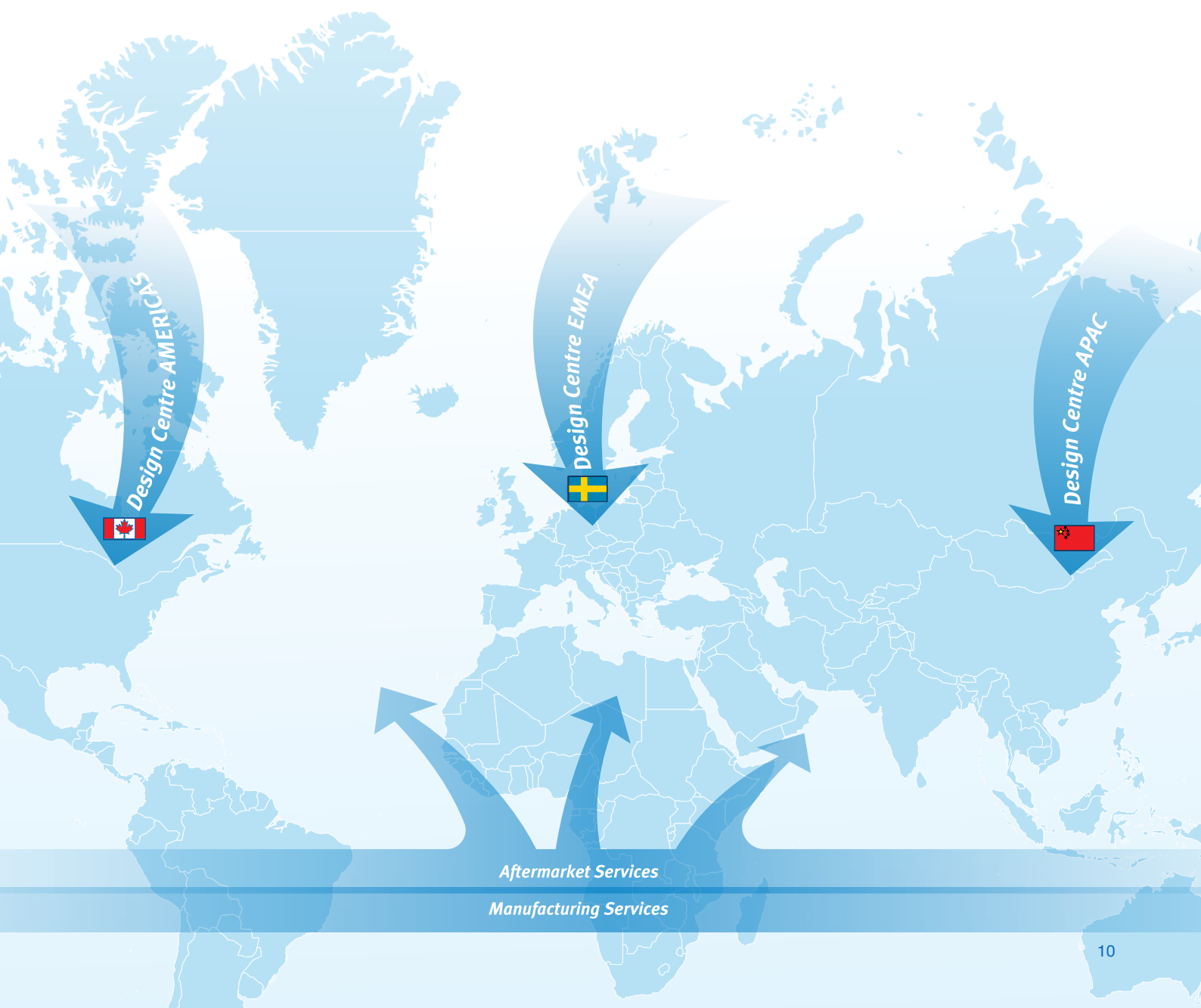
6.3 Requirements for business partners

The Syntronic Group requires suppliers to share the principles expressed in this Code of Conduct. We encourage our suppliers to apply standards of business conduct consistent with these principles.

By aligning with these standards, suppliers help foster a responsible and ethical business environment in partnership with the Syntronic Group.

6.4 Third-party Requirements

In addition to this Code of Conduct, there may be additional requirements from third parties such as our customers. In such cases, these requirements will be communicated separately to the relevant managers and personnel at the Supplier by a Senior Manager at Syntronic.



For general questions

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