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# AddSecure Business Partner Code of Conduct

AddSecure is a leading European provider of premium solutions for secure data and critical communications. We are a fast-growing company whose ambition is to create long-term financial value without compromising environmental and social values. Sustainability guides us in our daily operations as well as in our innovation and growth strategies.

AddSecure's Business Partner Code of Conduct is based on the core principles of the UN Global Compact and its underlying conventions and declarations within the areas of human rights, labor standards, environment and anti-corruption. Respect for human rights, fair and safe working conditions, and ethically and environmentally sound business practices are core to us. We expect the same from our business partners and suppliers.

## Scope

The AddSecure Business Partner Code of Conduct specifies minimum requirements and expectations that our suppliers, third party intermediaries and other business partners ("Business Partners") must comply with when doing business with AddSecure.

## Compliance

AddSecure verifies compliance with the requirements set out in the Business Partner Code of Conduct by means of self-assessment. AddSecure reserves the right to conduct on-site audits at any time, either through employees of AddSecure or through an independent and professional third party contracted by AddSecure provided that such contracted party is not a competitor of the Business Partner and has entered into confidentiality obligations reasonably acceptable to the Business Partner.

Lack of cooperation, failure to address violations of the requirements and/or non-timely implementation of necessary corrective action plans may result in a reduction in business and, ultimately, an end to the business relationship with AddSecure.

Any questions regarding the interpretation of our Business Partner Code of Conduct, or AddSecure's approach to sustainability can be raised to [info@addsecure.com](mailto:info@addsecure.com).

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## **The Business Partner undertakes herewith:**

### **General Requirements**

#### **Legal compliance**

To comply with all applicable laws, regulations, and standards in all the countries in which they operate. If there is a conflict between local law and this Code, local laws or regulations shall apply. Where the requirements in the Code are higher than local standards and laws, the requirements of the Code must be applied.

#### **Management and provision of information**

To have adequate management systems and controls in place to systematically assess, prevent and manage risks related to human rights, labor rights, business ethics and environmental impact to ensure compliance with the Code.

To carry forward these requirements to their suppliers and subcontractors.

To, upon request, provide appropriate data and information to AddSecure reports and assessments.

To immediately report existing or suspected violations of applicable laws and the Business Partner Code of Conduct to an AddSecure representative.

### **Human rights and labor rights**

To respect and protect Internationally recognized human rights and labor rights, to uphold the human rights of workers, and to treat them with dignity and respect. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

#### **Working conditions**

To provide workers with a written contract specifying the terms of employment, in a language understandable to the worker.

To ensure that working hours do not exceed the maximum set by local law.

To allow workers at least one day off every seven days.

To ensure that compensation paid to workers complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

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The wages shall at a minimum constitute a living wage, which should be sufficient to cover the basic needs of the employee and provide some discretionary income. Overtime is to be paid at a premium rate.

To not use deductions from wages as a disciplinary measure.

To respect the right of all workers to form and join trade unions, of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. If this right is restricted by local law, the employer shall facilitate the development of independent and free workers' representation and negotiations.

To allow workers and/or their representatives to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

#### Child labor and forced labor

To not use child labor in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

To ensure that young persons under the age of 18 do not carry out hazardous or heavy work or work during the night.

To not restrict workers freedom of movement, retain identification documents such as passports or national ID cards, or require workers to pay recruitment or agent fees.

#### Non-discrimination

To be committed to a workforce free of harassment and unlawful discrimination.

To promote equal opportunities for, and treatment of, employees irrespective of ethnicity, nationality, religion, sex, age, sexual preferences or other distinguishing characteristics.

#### Occupational health and safety

To provide all employees with a safe and healthy working environment and ongoing safety training to prevent accidents.

To identify and assess occupational risks and potential emergency situations and minimize their impact by implementing risk management plans and response procedures to minimize harm to life, the environment and property.

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To provide workers with appropriate, well-maintained, personal protective equipment, free of charge.

To encourage workers to raise safety concerns.

### Sanitation, food and housing

To provide workers with ready access to clean and lockable gender separated toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

To maintain worker dormitories provided by the Business Partner or a labor agent clean and safe.

### Environment

To obtain and maintain all required environmental permits and licenses relevant for its business and comply with the operational and reporting requirements of such permits and licenses.

To conduct an environmental risk assessment and take measures to prevent, mitigate and control the impacts of the business' operations.

To apply the precautionary approach in all aspects of the business' operations.

To prioritize and promote environmentally friendly technologies, for example in procurement.

### Energy consumption and greenhouse gas emissions

To track and document energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions, at the facility and/or corporate level. Efforts should be made to enable comprehensive Scope 3 greenhouse gas emissions reporting.

To continuously minimize energy consumption and reduce greenhouse gas emissions, and to look for cost-effective methods to improve energy efficiency.

### Pollution prevention and resource efficiency

To minimize or eliminate emissions and discharges of pollutants and generation of waste.

To optimize the use of natural resources throughout the supply chain, including water, fossil fuels, minerals and virgin forest products, by practices such as the implementation of circular

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design principles, modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

To implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

## Hazardous substances

To identify, label and manage chemicals and other materials posing a hazard to humans or the environment to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

To adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

## Water management

To implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination.

## Business ethics

### Business integrity

To uphold the highest standards of ethics and integrity in all business interactions.

To have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

To implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

### Disclosure of information

To transparently perform all business dealings, accurately reflected on Business Partner's business books and records.

### Intellectual property

To respect intellectual property rights.

To safeguard customer and supplier information.

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## Competition

To comply with competition and anti-trust laws and to not enter into discussions or agreements with competitors regarding price fixing, market sharing or other similar activities.

## Responsible sourcing of materials

To have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products, parts, components, and materials they manufacture does not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses in Conflict-Affected and High-Risk Areas.

To exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

## Privacy

To commit to protecting the privacy of personal information of everyone the Business Partner does business with, including suppliers, customers, consumers and employees.

To comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.