
SUPPLIER CODE OF CONDUCT

Introduction

Onnec Group continues to enhance the way we engage with our suppliers to encourage the continual improvement of the way we, and our supplier base, address and manage important issues. Onnec Group promotes and expects the application of high legal, ethical, environmental and employee-related standards within our own business and among our suppliers. Our commitment to integrity and professionalism is enclosed in this document which provides a clear set of standards for all of our business conduct.

Onnec Group is committed to treating all workers with respect and dignity, ensuring safe working conditions and conducting environmentally responsible, ethical operations. We expect suppliers in our operations and supply chain, and their suppliers, to embrace the following social, environmental and ethical responsibilities.

The term 'Supplier' as used in this code refers to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do or seek to do business with Onnec Group worldwide.

Supplier Conformance with Onnec Group's Supplier Code of Conduct

- A. **Underlying Obligations.** In addition to these responsibilities, suppliers must comply with all applicable laws; legal regulations, directives and guidelines; and all obligations in any contract that a supplier may have with us.
- B. **On-Site Work.** Suppliers using our or our clients properties or facilities will comply with all applicable policies and requirements.
- C. **Certifications.** Onnec Group requests that relevant certifications held by suppliers are shared. These include but are not limited to as ISO 9001 Quality Management System, ISO 14001 Environmental Management and ISO/IEC 27001 Information Security Management System (ISMS).
- D. **Information Disclosure.** Suppliers will accurately disclose information regarding their labour, health and safety, environmental practices, business activities, structure, financial situation and performance, in accordance with prevailing industry practices.

Onnec Group reserve the right to discontinue business with suppliers who are not responsive to requests to address concerns around workplace practices and instances of non-compliance with the Supplier Code of Conduct Policy.

Labour and Human Rights

Onnec Group is committed to upholding the human rights of workers and treating them with dignity and respect. This applies to all workers, including temporary, student, contract, direct employee and any other type of worker. All slavery and human trafficking laws must be complied with. Suppliers must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships.

Suppliers will pay legally mandated wages and benefits, will comply with the law regarding wage deductions and will provide workers with the basis on which workers are paid via payslip or similar documentation. Suppliers are expected not to deduct from wages as a disciplinary measure.

Non-Discrimination, Diversity, and Inclusion

Suppliers will not permit harassment, abuse, or inhumane treatment. Suppliers will not discriminate in screening, hiring or employment practices based on race, colour, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, covered veteran status or body art. Workers' religious practices will be reasonably accommodated. In addition, suppliers will demonstrate a commitment to identify, measure and improve a culture of diversity and inclusion through all aspects of workplace management.

Anti-bribery and Corruption

All anti-bribery and anti-corruption laws applicable to your business must be complied with including, where applicable, the UK Bribery Act 2010. Suppliers must maintain a policy that prohibits and procedures that prevent: any offer, promise, gift or solicitation of an advantage as an inducement or reward to a person for the improper performance of that person's position or as an attempt to influence a person, not fixed price or exchange pricing information with competitors, participation in any other form of corrupt practice (such as theft, fraud, conspiracy to defraud, blackmail, participation in a criminal organisation and money laundering) under any circumstances. Avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest.

Environmental

Onnec Group recognises that environmental responsibility is integral to producing world-class products. Suppliers may be encouraged to adopt environmentally sustainable practices, such as reducing carbon footprint, conserving natural resources, managing waste responsibly, and complying with relevant environmental laws. Environmental Permits and Reporting. Suppliers will obtain and keep current all required environmental permits, approvals, and registrations, and follow their operational and reporting requirements.

- A. **Resource Efficiency and Clean Energy.** Throughout their operations, suppliers will work to reduce consumption of resources, including raw materials, energy and water. Suppliers will endeavour to track, document and seek to minimise energy consumption and greenhouse gas emissions, and seek ways to improve energy efficiency and use cleaner sources of energy.
- B. **Hazardous and Restricted Substances.** Suppliers will identify and manage chemicals and other materials that pose a hazard to the environment, to ensure their safe handling, use, storage and disposal. Suppliers will identify, monitor, control, treat and reduce hazardous air emissions, wastewater and waste generated from its operations. Suppliers will adhere to our requirements restricting use of specific substances, including labelling for recycling or disposal.
- C. **Waste Mitigation:** Suppliers will work to reduce or eliminate waste of all types. Where waste cannot be eliminated, suppliers will manage and control all waste streams to comply with applicable laws and regulations, and in an environmentally responsible and secure way.

Health and Safety

Onnec Group requires our suppliers to comply with all relevant health and safety legislation and with all standards and codes of practice specific to their business.

- A. **Healthy and safe working environment.** A safe environment should be provided for all employees and visitors in accordance with international standards and national laws. Necessary precautions should be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of the supplier's business activities. Adequate policies and procedures relating to health and safety should be in place, which are either provided to, or accessible by, employees. Appropriate training on health and safety should be provided to employees. The causes of hazards inherent in the working environment should be removed.
- B. **Emergency Preparedness.** Suppliers will identify and plan for potential emergencies and will implement emergency plans and provide guidance to workers on emergency response procedures, including emergency reporting, worker notification and evacuation, drills, fire detection and suppression equipment, exit facilities and recovery plans.
- C. **Sanitation.** Suppliers will provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage and eating facilities.

Information and Data Protection

Onnec Group requires our suppliers to comply with all data protection and privacy laws regarding the collection, storage, disposal, use and disclosure of personal data and adhere to all local and data protection laws.

Management System

Suppliers are expected to adopt or establish a system to carry out these responsibilities. The management system will be designed to ensure suppliers' operations: (a) comply with our requirements and applicable laws and regulations; (b) conform to these responsibilities; and (c) identify and mitigate operational risks related to these responsibilities. It should also facilitate continual improvement.

Monitoring

Onnec Group may conduct annual compliance surveys to confirm compliance with this Supplier Code of Conduct. However, Onnec Group expects that suppliers will actively audit and monitor their day-to-day management processes with respect to the Onnec Group Code of Conduct and provide evidence to Onnec Group upon request.