



# Device Europe Supplier Code of Conduct



## Introduction

Device Europe Code of Conduct is Device Europe's corporate policy and general reference document to responsible, efficient, and transparent business behavior. It outlines our core values and commitment to the fundamental principles on human rights, ethical business practices, mitigation of climate change and workplace inclusion and diversity.

We uphold similar expectations for our suppliers with whom we engage. Device Europe Supplier Code of Conduct applies to our suppliers of products and services, including direct suppliers, sub-suppliers, manufacturers, and business partners producing goods and/or providing services to Device Europe. The principle of the Code covers all employees associated with the Supplier. The Supplier is also responsible for ensuring that its sub-suppliers follow the principles in the Code.

We recognize that some aspects of the Supplier Code of Conduct are only relevant to, and therefore applicable for, our suppliers of products.

Device Europe supports international standards in human rights, labour conditions, the environment and anti-corruption. Conventions and frameworks such as the Universal Declaration of Human Rights (UDHR), the Children's Rights and Business Principles, UN Guiding Principles for Business and Human Rights, International Labour Organization (ILO), Fair Labour Association, OECD Guidelines for Multinational Enterprises, UN Global Compact and Ethical Trading Initiative (ETI) have been used as references in preparing this Code. The Code uses also to some extent the structure and contains language from the Responsible Business Alliance, RBA Code of Conduct, version 7.0.

## Legal compliance versus the Code

Suppliers are required to operate in accordance with the principles of Device Europe Supplier Code of Conduct and in full compliance with all applicable laws and regulations. For some areas, this Code goes beyond mere compliance with the law by drawing upon internationally recognized standards to advance social and environmental responsibility. When differences arise between the Code and legal requirements, the stricter position to corporate responsibility matters shall apply, provided it is in accordance with applicable law.



## Human and Labour Rights

Workers shall be treated with dignity and respect. This applies to all workers including permanent, temporary, migrant, student, juvenile, contract workers and any other type of workers. Suppliers shall not tolerate human rights violations including unlawful discrimination or victimization in any form.

Human and Labour Rights principles include the following aspects:

### 1. Right to Freedom of Association and Collective Bargaining

Suppliers shall respect the right of all workers to form and join trade unions/associations of their choice and to bargain collectively. Open communication and direct engagement between workers and management are the most effective ways to resolve workplace issues. When operating in countries where trade union activity is unlawful or where free and democratic trade union activity is not allowed or have not been established, suppliers shall respect this principle by allowing workers to freely elect their own representatives to ensure worker - management communication regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

### 2. Non-Harassment

Suppliers shall commit to a workplace free of harassment and unlawful discrimination. Companies shall not engage in discrimination or harassment based on gender identity and expression, age, religion, race, pregnancy, disability, ethnicity, national origin, nationality, union membership, political affiliation, sexual orientation, or marital status in hiring and employment practices such as promotions, rewards, access to training and exit practices. Workers or potential workers shall not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that are irrelevant and test results must not be used in a discriminatory way.

### 3. Grievance Systems

Suppliers shall ensure that workers have a mechanism to report grievances (and seek remediation for their employment issues) that facilitates open communication between management and workers. A grievance procedure shall define how issues are raised, objectively investigated, evaluated, concluded, and communicated back to original person who raised the issues. Formal grievances and complaints shall be documented.

### 4. Wages and Benefits

Supplier shall provide all workers (including permanent, temporary, migrant, student, juvenile, contract workers and any other type of workers) with fair compensation that is sufficient to provide a decent living for themselves and their families. Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates.

Supplier shall ensure statutory payments (e.g., social insurances, pensions) are paid for all workers. Deductions from wages as a disciplinary measure shall not be permitted. For each



pay period, workers shall receive a timely and understandable wage statement or pay slip that includes sufficient information to verify accurate compensation for work perform.

## 5. Working Hours

Suppliers shall ensure that workweeks do not exceed the maximum working hours as defined by local labour laws or applicable collective agreements. A workweek shall however be restricted to 60 hours, including overtime except in emergencies or unusual situations. Regular workweeks shall not exceed 48 hours. Workers shall have at least one day off in seven consecutive days. All overtime work must be voluntary.

## 6. Child labour avoidance

Child labour is prohibited in any stage of the supply chain. The term "child" refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, whichever is greatest.

Suppliers shall establish a reliable and effective age-verification mechanism as part of the recruitment process, which may not be in any way degrading or disrespectful to the worker. This principle aims to protect children from any form of exploitation. Suppliers located in countries with a high risk of child labour, shall have a child labour remediation plan in place, which describes the actions to be taken in case a child is found working in the supplier premises.

Special care shall be taken on the dismissal of children, as they can move into employment that is more hazardous. In removing children from the workplace, suppliers shall identify measures to ensure the protection of affected children and to cooperate with local non-governmental organizations (NGOs) to find the best solution for the child. Any measures taken shall always aim to improve, not worsen, each individual child's situation. Any costs for education, etc. shall be paid by the factory. The supplier shall inform Device Europe in writing of its discussions with local NGO's and any measures taken in respect of each individual child.

## 7. Young and Student Worker Protection

Supplier may employ juveniles / young workers who are older than the applicable legal minimum age but are younger than 18 years of age, provided they do not perform work that is likely to jeopardize their health, safety, well-being, and development including but not limited to night work, heavy lifting, overtime, or work with toxic chemicals.

Legitimate workplace apprenticeship programs, which comply with all laws and regulations, can be used to support youth employment. Supplier shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Supplier shall provide appropriate support and training to all student and young workers. The total share of student workers shall not exceed 30 % of the total workforce. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.



## 8. Freely chosen employment

Suppliers shall not engage in any form of forced, bonded (including debt bondage), indentured labour, involuntary prison labour, slavery, or trafficking of persons. This includes transporting, harbouring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

As part of recruitment, workers must receive a written employment agreement in a language understood by the workers that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change (s) allowed in the

employment agreement upon arrival in the receiving country unless these changes are made to meet to the local law and provide equal or better terms. Workers shall not be required to give financial deposits or hand over government-issued identification, passports, travel documents or work permits to the supplier or Labour Agent as a condition of employment. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

Suppliers shall not impose unreasonable restrictions on movement within the workplace during breaks, using toilets, accessing water, to seek/access medical attention. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment if workers give reasonable notice to the employer.

## 9. Humane Treatment

Suppliers shall commit to a workplace free of harsh or inhumane treatment. Suppliers shall ensure that workers are not subject to harsh or inhumane treatment including but not limited to corporal punishment, sexual abuse, bullying, public shaming, mental or physical coercion, sexual harassment, or verbal abuse of workers; nor is there to be the threat of such treatment.

Suppliers shall ensure that company rules and disciplinary procedures are clearly defined, progressive and communicated to all workers. Disciplinary procedures shall prohibit physical punishment, mental or physical coercion, verbal abuse, and financial deductions from basis wages, or the threat thereof. All disciplinary procedures must be established in writing and shall be explained verbally to workers in understandable terms.



## Health and Safety

Workers' safety shall be always a priority. Minimizing work-related injuries and illness and providing a safe and healthy work environment enhance the quality of products and services, consistency of production and worker attrition. Ongoing worker dialog and training is essential to identifying and solving daily health and safety issues. Health and Safety principles include the following aspects:

### 1. Health and Safety Management System

Supplier shall implement a health and safety management system to ensure effective planning, operation and control of health and safety hazards and risks, satisfying the requirements of ISO45001 or other similar internationally recognized standards. Worker potential! for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified, assessed and mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout) and providing ongoing occupational health and safety training. The management system shall comply with applicable safety and health legislation, cover regular internal audits or safety rounds, improvement objectives and programs and management reviews. Supplier shall measure compliance and track performance in a systematic way and look for opportunities to continuously improve.

### 2. Health and Safety Permits

Suppliers shall obtain, keep current, and comply with all required health & safety permits.

### 3. Emergency Preparedness and Response

Suppliers shall assess all potential emergency situations and have their impact minimized by implementing emergency response plans and procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. For each situation suppliers shall implement an emergency plan and response procedure that will minimize potential! harm to life, the environment and property.

### 4. Occupational Injury and Illness

Suppliers shall implement an efficient process for preventing, tracking, reporting, and investigating occupational injury and illness. Workers shall be encouraged to report all injuries, incidents, and illness cases, provide necessary medical treatment, investigate cases (minor, major, and near misses), implement corrective actions to eliminate their causes and facilitate the return of workers to work.



## 5. Physically Demanding Work

Suppliers shall ensure worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

## 6. Machine Safeguarding

Suppliers shall evaluate the safety risks associated with the production machines of the facility. Where production machines present an injury hazard to workers, the machines shall be clearly marked with necessary warning signs in appropriate language and equipped with safeguarding, physical guards, interlocks, and barriers, which must be in use and well maintained.

## 7. Chemical Safety

Suppliers shall ensure safe management of chemicals. Health and safety hazards associated with handling, storage, usage, and recycling of chemicals are to be identified and the risks they may cause are to be assessed, eliminated, minimized, or otherwise controlled. Procedures shall provide requirements on approval for taking chemicals into use, receiving and proper storage, exposure audit and control, safe chemical handling including use of Personal Protective Equipment (PPE), first aid measures and emergency response.

Up to date Material Safety Data Sheet(s) (MSDS) shall be available to all workers in a language they understand for each chemical on site. Workers working with chemicals shall be given necessary training.

## 8. Personnel Protective Equipment (PPE)

Suppliers shall ensure that health and safety hazards associated with production are identified and controlled by eliminating, substituting, or minimizing the hazard with the help of engineering and administration controls. In cases where the health and safety risk cannot be otherwise controlled suppliers shall ensure workers are equipped with appropriate Personal Protective Equipment (PPE). A hazard assessment shall be completed which identifies the type of personal protective equipment (PPE) required for each operation. PPE requirements shall be communicated, and workers shall be trained in the correct use and storage of PPE. PPE shall be provided free of charge, be in good condition, regularly checked and maintained and be used by workers.

## 9. Fire Safety

Suppliers shall ensure that fire safety comply with legal requirements. Emergency evacuation routes shall be posted in each work area. Exits shall be clearly marked, aisles unblocked and exit doors unlocked and open outwards. Lighting must be sufficient to light corridors, halls, staircases along evacuation routes, and must be checked and maintained. Fire alarms shall be visible and audible to all workers. Sprinkler systems and smoke detectors shall be implemented according to legal requirements. Fire extinguishers must be placed in visible and accessible locations and checked and maintained on a regular basis.



All workers shall be made aware of the safety arrangements. Fire drills must be conducted for all workers as per legal requirement but at least once per year and recorded with improvement actions.

## 10. First Aid

All workers shall have access to first aid and emergency care. First aid kits must be available in visible and accessible locations, kept properly stocked and replenished on a continual basis. At least one person in the factory shall have training in basic first aid. The identity of the first aiders shall be clearly displayed in work areas and be incorporated in the emergency response plan.

## 11. Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.





## Living and Housing Conditions

Good conditions in worker dormitories and canteens are critical to a healthy work/life environment. The living area per worker shall be hygienic, safe and offer personal integrity. Depending on the type of working contract, specific attention should be given to either providing single workers' accommodation or family accommodation. As a general recommendation, the more permanent the housing, the greater considerations should be given to enabling workers to live with their families. Living and Housing Condition principles include the following aspects:

### 1. Food and Water

Supplier shall ensure that workers are provided with ready access to clean toilet facilities and potable water. Water quality shall be periodically tested. If a canteen is available on the factory campus or industry park; the supplier shall ensure that it is clean and hygienic and have fire precaution measures. The food in the canteen shall be offered to workers at reasonable costs. Applicable laws and regulations regarding food hygiene management shall be identified and followed compliance reviews shall be carried out periodically.

### 2. Worker Dormitories

If the supplier or a labour agent provides worker dormitories, they shall be clean and safe. The dormitories shall be equipped with fire extinguishers, exits, lighting, offer hot water for bathing/showering and have adequate heat and cooling. In addition, they should provide reasonable personal space, along with reasonable entry and exit privileges. Dormitories shall be provided at a reasonable cost and be voluntary to live in. The workers shall be free to enter and exit at all times.

Suppliers are encouraged to provide entertainment facilities to workers to promote work life balance and improve worker wellbeing. Showers, changing rooms, toilets and similar facilities shall comply with applicable regulations and be safe to use. To ensure an acceptable standard of hygiene and cleanliness, the supplier shall ensure periodic inspection and maintenance.



## Environmental Protection

Supplier shall strive to continuously improve its environmental performance by using natural resources sustainably, promoting recyclability, mitigating climate change, and ensuring any other adverse effect on the community and environment is controlled. Environmental principles include the following aspects:

### 1. Environmental Management System

Suppliers shall implement an environmental management system to ensure effective planning, operation and control of environmental aspects and impact, satisfying the requirements of ISO 14001 or other similar internationally recognized standards. The management system shall comply with applicable environmental legislation, cover regular internal audits and inspections, environmental improvement targets and programs, necessary worker training and communication and management reviews. Supplier shall measure compliance, track performance in a systematic way and look for opportunities to continuously improve.

### 2. Environmental Permits and Reporting

Suppliers shall ensure that all required environmental permits and approvals (e.g., EIA, discharge monitoring) are obtained, monitoring and reporting requirements are followed and that third party monitoring (e.g., air emission, noise levels) are conducted as required.

### 3. Pollution Prevention and Resource Reduction

Suppliers shall take necessary measures to avoid environmental degradation, assess significant environmental impact of operations and establish effective policies and procedures that reflect their environmental responsibility. Suppliers shall always strive for continuous improvements. Reasonable attempts shall be made to reduce the consumption of energy, generation of waste, wastewater or eliminate hazardous constituents from the products. Materials shall be used efficiently.

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment, modifying production, maintenance, and facility processes, or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, and other means.

### 4. Hazardous Substances

Chemicals, waste, and other materials' posing a hazard to humans, or the environment are to be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Flammable & hazardous waste storage shall be located away from canteen, dormitories, and production areas, have necessary hazard signs, spill-kits, isolated drainage / secondary containers, controlled access and contain necessary fire



prevention features. If a sub-supplier is used for waste disposal, the supplier shall ensure that the sub-supplier is appropriately authorized and licensed.

## 5. Solid Waste

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

## 6. Water Management

Suppliers shall 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. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

## 7. Air Emissions

Suppliers shall ensure air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products and greenhouse gas emissions generated from operations are characterized, regularly monitored, controlled, and treated as required prior to discharge.

Supplier shall conduct routine monitoring of the performance of its air emission control systems.

## 8. Materials Restrictions

Suppliers shall comply with all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

## 9. Energy Consumption and Greenhouse Gas Emissions

Suppliers are to establish a corporate-wide greenhouse gas reduction goal. Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal. Suppliers are to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.



## Legal Compliance and Ethical Business Practices

Suppliers shall uphold the highest standards of integrity and ethical business behavior in all business operations.

### 1. Legal and Regulatory Compliance

Suppliers shall conduct their business activities in full compliance with applicable laws and regulations while conducting business with and/or on behalf of Device Europe.

Device Europe expects that the Supplier is accountable for its procedures for ensuring compliance with the Code. Suppliers are also responsible for their respective sub-suppliers for deploying these principles throughout the supply chain. This includes assessments, audits, inspections, and corrective actions.

### 2. Fair Competition

Suppliers shall conduct their business in full compliance with applicable antitrust and fair competitions law.

### 3. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

### 4. Conflict of Interest

Suppliers shall avoid all conflicts of interests or situations giving the appearance of potential conflict of interest in its business activities with Device Europe. Device Europe expects the Supplier to report to Device Europe any situations of actual or potential conflicts of interests between the personal interests of those involved in the business activities and the interests of Device Europe.

### 5. Disclosure of Information

All business dealings should be transparently performed and accurately reflected on the Supplier's business books and records. Information regarding supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.



## 6. Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

## 7. Information Protection

Supplier shall properly handle sensitive information, including confidential, proprietary, and personal information. Information may only be used for the purpose it was provided.

Supplier shall respect intellectual property rights and ensure that transfer of technology and know-how is done in a manner that protects intellectual property rights.

## 8. Data Privacy

Suppliers are to commit to protecting the reasonable privacy expectations of personal data of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal data is collected, stored, processed, transmitted, and shared.

## 9. Insider Trading

Supplier shall not buy or sell Device Europe or another company's securities if and when the Supplier has access to non-public information that is likely to significantly affect the security price. In addition, the Supplier may not induce anyone else, by giving advice or in some other manner, to undertake such trading.

## 10. Export Control

Supplier shall ensure that its business practices comply with applicable laws and regulations governing export, import and retransfer of products, software, technical data and assistance.

## 11. Intellectual Property

Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights and customer and supplier information is to be safeguarded.

## 12. Conflict minerals

Suppliers, manufacturing or distributing components, parts, or products containing tin, tantalum, tungsten, and/or gold shall develop a Conflict Mineral Policy, outlining their commitment to responsible sourcing and legal compliance. Suppliers shall exercise due diligence on relevant minerals in their supply chains in order to ensure traceability of these metals to smelter level and take appropriate steps to mitigate the use of conflict minerals or



derivative metals sourced from mines controlled by armed groups in all items to be supplied to Device Europe.

Supplier shall source from "conflict-free" validated smelters to the extent sustainable without detrimental effects to the local population. Suppliers are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

Suppliers shall respond in a timely manner to Device Europe's request for information on their activities and findings related to conflict minerals and responsible sourcing of minerals.



## Compliance, Guidance and Reporting

Device Europe's Supply Chain organization is accountable for implementing and monitoring our suppliers' compliance with Device Europe Supplier Code of Conduct. Any known or suspected non-compliance with this policy must be reported, corrected, and followed up.

### Compliance

In order to ensure compliance of this policy, Device Europe reserves the right to carry out announced or unannounced audits or inspections of any factory or warehouse producing goods or services for Device Europe, at any time. Audits can also be made by an independent third party of Device Europe's choice. The supplier or manufacturer shall on request provide all appropriate records and documentation needed to follow up the compliance of the Code. If a supplier fails to correct any non-conformances to the Code in accordance to the corrective and preventative action plan within agreed timeframe, Device Europe may serve the rights to stop purchasing until the matter is resolved or can terminate the business relationship. In the event of repeated violations, Device Europe will immediately terminate the business relationship and cancel existing orders.

### Guidance

For guidance regarding this policy, please contact Supply Chain at Device Europe.

Email: [supplierCoC@deviceeurope.com](mailto:supplierCoC@deviceeurope.com)

### Reporting

Device Europe encourages our employees and suppliers' employees to report any known or suspected non-conformances from this policy by sending an email or letter to Head of Sustainability at Device Europe.

Email: [supplierdeviation@deviceeurope.com](mailto:supplierdeviation@deviceeurope.com)

### Non-Retaliation

Regardless of the reporting channel, all allegations of potential violations of the Code that are made in good faith will receive a swift, fair, and comprehensive investigation conducted with the relevant internal and/or external assistance. There shall be no retaliation or other negative consequences for persons reporting in good faith. The information received will be managed according to applicable data privacy laws and regulations.



## Device Europe Supplier Code of Conduct Commitment

We hereby confirm that we have taken part of and fully understand Device Europe Supplier Code of Conduct.

We confirm that we have full knowledge of all relevant laws in the countries where we operate as well as the international standards referred to in this policy.

We agree to comply with this Device Europe Supplier Code of Conduct, to take responsibility for informing suppliers, sub-suppliers, producers, and business partners involved in the production and supply of goods and services for Device Europe about the requirements in this policy.

We acknowledge that Device Europe, or any independent party appointed by Device Europe, has the right to make inspections at our factories, and factories of our suppliers, producing goods and services for Device Europe. We will without delay provide Device Europe with detailed information on the location of all production units used for production of goods and services for Device Europe.

## Authorization of this Policy

Approved by the Device Europe Board of Management, July 2023. The original language of this document is English. If translated, the English version shall take precedence.

Date:

Company name:

Signature by authorized company signatory:

Name:

Title: