



SUPPLIER CODE OF ETHICS AND CONDUCT

PRINCIPLES OF ETHICAL CONDUCT

At Device Europe, our mission is to revolutionize IT Asset Disposition (ITAD) by delivering secure, sustainable, and cost-effective solutions that empower businesses to responsibly manage their technology assets.

We are committed to safeguarding data, minimizing electronic waste, and enabling our clients to achieve their environmental and operational goals. Through our expertise, innovation, and dedication, we strive to be the trusted partner that empowers organizations to embrace the future with confidence. In doing so, we aim not only to drive long-term economic success but also to create a meaningful, positive impact on society and the planet.

In line with our mission, values, and guiding principles, we strive to make a positive impact on the natural environment, working conditions, and the local community, while fulfilling our business obligations to the highest possible standard.

Our relationships with business partners are founded on the principles of responsible business conduct. Therefore, we aim to collaborate with suppliers who uphold equally high ethical standards. This Supplier Code of Ethics and Conduct (hereinafter referred to as the "Code") defines the requirements and expectations regarding the ethical behavior of suppliers.

These principles apply to all suppliers of goods and/or services provided to Device Europe.

The achievement of our mission would not be possible without responsible partners. That is why we expect our suppliers to share our values and actively contribute to sustainable development by complying with the principles outlined in this Code.

Approved by:

Maciej Jakimiec

A handwritten signature in blue ink that reads "Maciej Jakimiec". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

EXPECTATIONS TOWARDS SUPPLIERS

1. Compliance with the Law

Suppliers are required to conduct their business in accordance with the principles outlined in the Device Europe Supplier Code of Ethics and Conduct and in full compliance with all applicable laws and regulations. In some areas, this Code goes beyond mere legal compliance by referring to internationally recognized standards to promote social and environmental responsibility. Where differences arise between the Code and legal requirements, the more stringent position on social responsibility shall apply, provided it remains compliant with applicable law.

2. Human Rights and Labor Standards

All forms of forced, bonded, or unpaid labor are strictly prohibited.

Employees must be provided with freedom of employment, including the right to terminate employment at any time with notice, in accordance with applicable laws.

Suppliers must not use child labor and must comply with minimum age requirements for employment.

Suppliers are required to provide a safe workplace free from all forms of violence, abuse, and harassment.

The right of employees to freely associate and enter into collective agreements must be respected.

3. Anti-Discrimination and Equal Rights

Suppliers must not engage in any form of discrimination based on gender, age, disability, race, religion, nationality, political beliefs, union affiliation, ethnic origin, faith, sexual orientation, type of employment, or working hours.

Suppliers are required to ensure equal professional opportunities in all aspects of work, including recruitment, hiring, promotion, remuneration, and professional development.

4. Compensation and Working Time Practices

Suppliers must guarantee that employees receive compensation and benefits in accordance with applicable regulations, including minimum wage and overtime rules.

The weekly working time must be in line with legal limits.

Employees must be granted at least one day off in every seven-day work period, as well as the right to vacation leave, maternity leave, paternity leave, and other days off as required by law.

Overtime work must be voluntary and must not exceed 12 hours per week or the legally permitted limit, except in emergency or extraordinary situations.

5. Occupational Health and Safety

Suppliers must provide safe and healthy working conditions in compliance with applicable health and safety regulations and standards.

Occupational safety procedures should include, in particular: visible emergency exit signage and posted evacuation plans, accessible and regularly maintained fire extinguishers, first-aid kits and personal protective equipment, as well as regular inspections of machines and devices.

Suppliers must comply with regulations regarding the storage of hazardous materials.

Working conditions must meet cleanliness, ventilation, and lighting standards and provide access to sanitary facilities.

The consumption of alcohol, drugs, other intoxicants, or possession of dangerous items in the workplace is prohibited.

6. Fair Business Practices

Bribery in any form is strictly prohibited, including illegal commissions, kickbacks, or any other unlawful incentives intended to obtain or retain business advantages or influence procurement decisions.

It is inappropriate to offer gifts or other benefits that could be perceived as an attempt to influence individuals in official, business, or professional relationships.

Only symbolic, promotional items of nominal value are acceptable.

Suppliers must avoid any situations that could constitute a conflict of interest.

Confidential information obtained during business cooperation with Device Europe must be treated with due discretion and not disclosed to third parties without written consent from Device Europe.

7. Environmental Protection and Social Responsibility

Suppliers should conduct their operations with environmental protection in mind at every stage of production or service, particularly in sourcing, processing, and disposal of materials.

Suppliers are expected to implement solutions aimed at minimizing environmental impact through effective management of energy, water, waste, and air emissions.

In their operations, suppliers should consider the well-being of local communities and engage in initiatives that support their development.

8. Code Compliance and Control Mechanisms

Each supplier working with Device Europe is obliged to respect our values and ethical principles and to comply with the provisions of this Code in their operations.

Suppliers are responsible for implementing and enforcing the Code within their own organizations.

Any doubts or violations of this Code should be reported without delay via email to: compliance@deviceeurope.com or by traditional correspondence.

No employee may be discriminated against or penalized for providing information about non-compliance with the Code. Suppliers are required to allow authorized Device Europe representatives to verify compliance with the Code, including access to facilities, relevant documentation, or by completing a self-assessment questionnaire.

If non-compliance is identified, Device Europe may recommend a corrective action plan.

Suppliers are obligated to comply with the provisions of the Device Europe Supplier Code of Ethics and Conduct by submitting the declaration below.

