

Supplier Code of Conduct

Preamble

EKINOPS SA and its subsidiaries (hereinafter Ekinops) have undertaken a proactive approach to sustainable development within the framework of their activities. This approach must therefore be extended to the level of procurement and subcontracting contracts for services and product manufacturing, which are essential components of their operations.

This Supplier Code of Conduct (hereinafter the "Code of Conduct") outlines the principles and standards that Ekinops expects all suppliers, subcontractors, and service providers (hereinafter the "Supplier(s)") to uphold. It defines our expectations in areas such as ethics, human rights, labor practices, health and safety, and environmental protection.

By accepting and adhering to this Code of Conduct, the Supplier acknowledges and commits to fulfilling the obligations and responsibilities set forth herein, as an integral part of their business relationship with Ekinops.

- The Supplier undertakes to comply with and implement all the principles set out therein, and to ensure that its own suppliers and sub-contractors do the same, in accordance with the applicable contractual provisions and national laws.
- It undertakes to receive, and as far as possible, to ensure that its own suppliers and subcontractors receive, the auditors – whether internal or external –whom Ekinops may mandate to verify compliance.
- The Supplier complies, for all the themes of the Code of Conduct, with the principles deriving from the United Nations Universal Declaration of Human Rights, the fundamental conventions of the International Labor Organization (ILO) and the Sustainable Development Goals (UN) 1, in compliance with the applicable laws and regulations and the contractual stipulations in force.

Non-compliance by the Supplier with any of the principles set out in this Code of Conduct would constitute a serious breach of its contractual obligations. Should Supplier fail to remedy in a reasonable period, despite written request by Ekinops to do so, Ekinops may decide to (i) suspend business with the Supplier, (ii) exclude the Supplier from list of authorized suppliers, (iii) terminate without liability any and all contracts between Ekinops and the Supplier.

Should Supplier, due to particular circumstances, be unable to comply with certain provisions of the Code of Conduct, it must inform immediately Ekinops about it in order to agree on the corrective measures to implement.

Supplier Code of Conduct

1. RESPECT OF THE 10 PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT

Supplier confirms its statement to comply with the ten (10) principles of the United Nations Global Compact.

The ten (10) principles are:

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses.

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labor;

Principle 5: The effective abolition of child labor; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

Supplier Code of Conduct

2. MANAGEMENT SYSTEM

Suppliers should establish a management system and take reasonable measures to monitor compliance with the principles of this Code of Conduct and promptly correct any non-compliance. This management system should be in line with international standards and best practices, such as: ISO 9001, ISO 14001, and to the extent possible: ISO 27001, ISO 45001, ISO 50001.

3. ETHICS

The entities of the Ekinops Group and their Suppliers act in a responsible, loyal, and open manner in order to establish and maintain lasting relationships of trust. The Supplier conducts its activities in accordance with the principles of honesty and fairness as well as with applicable laws and regulations, in particular regarding competition and the prohibition of corruption. The negotiation and execution of contracts must not give rise to behavior or facts that can be qualified as active or passive bribery, complicity in trading in influence or favoritism.

3.1. Gifts and invitations

The Supplier shall refrain from offering or offering to any Ekinops Group employee, for himself or his relatives, any gift, invitation, act of convenience, favor or any other advantage, pecuniary or otherwise, likely to corrupt, influence or hinder the integrity, independence of judgment or objectivity of said employee in his relations with the Supplier. The Supplier agrees not to bear the travel or accommodation costs of a Group employee, in particular on any commercial meeting, site visits, audits or product presentations.

3.2. Conflicts of interest

The Supplier avoids situations where there is a real or potential conflict of interest with Ekinops Group employees or one of their relatives, which could harm the independence or the objectivity of their professional actions or decisions. Where it has not been possible to exclude the occurrence of a conflict of interest, the Supplier shall be transparent in informing Ekinops of the situation, so that Ekinops can handle it.

4. RESPECT FOR LABOR STANDARDS

4.1. Freedom of association and the right to collective bargaining

The Supplier undertakes to comply with the principles of freedom of association, protection of the right to organize and collective bargaining of Convention C87 of the International Labor Organization (ILO), in accordance with local law.

4.2. No use of forced or compulsory labor

The Supplier undertakes not to use forced or compulsory labor as defined in ILO conventions C29 and C105. Convention C29 defines forced or compulsory labor as any work or service exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. The retention, as a condition of employment, of identity papers,

Supplier Code of Conduct

passports, training certificates, work permits or any other identification document is prohibited, as is the obligation for workers to provide deposits or financial guarantees.

4.3. No use of illegal work

The Supplier undertakes not to use illegal work as defined by the rules of the countries in which it operates.

4.4. No use of Child labor

The Supplier undertakes to apply the provisions relating to the elimination of child labor and the protection of children defined by the ILO conventions, in particular conventions C138 and C182 relating to the minimum age required.

4.5. No discrimination

Under the conditions provided by ILO Convention C111, the Supplier undertakes not to make any distinction, exclusion or preference based on race, color, gender, religion, political opinion, ancestry national or social origin, which has the effect of destroying or altering equality of opportunity or treatment in matters of employment or occupation. The Supplier respects local legislation in terms of employment of people with disabilities.

4.6. Hours of work

The Supplier complies with local legislation regarding working hours, including overtime. In the absence of national laws, ILO standards must apply, namely that working hours may not exceed 8 hours a day and 48 hours a week. All workers have at least 24 consecutive hours of rest per 7-day period.

4.7. Level of remuneration

The Supplier complies with local minimum wage legislation and undertakes to pay their wages to employees on a regular basis. The Supplier undertakes to pay overtime hours in accordance with the rates defined by the applicable local legislation. In the absence of national regulations, remuneration should be sufficient to meet basic needs, in accordance with ILO Convention C131 on the fixing of minimum wages. The Supplier must provide clear information to its workers on their conditions of remuneration.

4.8. Harassment

Supplier Employees must not be subject to physical sanctions, harassment, or abuse of a physical, sexual, psychological, or verbal nature.

5. PROTECTION OF HEALTH AND SAFETY

The Supplier undertakes to provide its workers with a safe environment, protecting their health. The Supplier must identify and assess risks related to its workers' activity. The Supplier must do everything possible to control these risks and take the necessary precautionary measures in the prevention and protection against accidents and occupational diseases. In particular, the Supplier must:

Supplier Code of Conduct

- ensure that workers have sufficient health and safety knowledge,
- inform workers and train them in the prevention of any danger or risks linked to usage of production equipment or tools,
- provide workers with appropriate protective clothing and equipment, and instructions for their use,
- when necessary, guarantee access to first aid for workers,
- ensure, when providing accommodation, that it is clean and safe, and that it meets the essential needs of workers.

The Supplier also ensures that its activities and products do not harm the health and safety of its subcontractors, neighboring populations, and users. The Supplier is encouraged to implement a health and safety management system, based on international standards such as ISO 45001 or any other equivalent standard.

6. ENVIRONMENTAL PROTECTION

Ekinops recognizes the utmost importance for the telecommunication industry to protect the environment and biodiversity, and especially with regards to the urgency of climate change. We are therefore committed to protecting the environment and promoting environmental sustainability across our value chain (upstream and downstream).

Ekinops efforts require to work closely and collaboratively with our value chain peers and especially our suppliers. As a minimum requirement, Ekinops expects its suppliers to apply precautionary environmental principles:

- The Supplier shall have a publicly available environmental policy in place.
- The Supplier conducts an approach aimed at minimizing its negative environmental impacts and implementing measures contributing to the protection of the environment, both for its products and for its management system, in particular regarding the protection of nature, maintenance of biodiversity and ecosystems, depletion of natural resources, and management of waste and toxic substances.
- The Supplier strives to limit nuisance to residents, reduce its energy consumption, releases to water, air and soil and the waste generated during the various stages of its activity, including packaging.
- The Supplier must obtain and comply with all the necessary environmental permits.
- The Supplier integrates the criteria of respect for the environment, health and safety in the purchase of products and services, the design, production and implementation of its own products and services, in order to reduce their impact in these areas throughout their life cycle, while maintaining and / or improving their quality.

Supplier Code of Conduct

- At a minimum, the Supplier undertakes to comply with the laws and standards which apply locally, as well as with the laws applicable in the country or countries of destination of the product, including but not limited to, RoHS EU directive and the REACH EU Regulation with respect to the prohibition or restriction of hazardous substances.
- The Supplier should implement an environmental management system based on international standards, such as the ISO 14001 standard.
- The Supplier is also encouraged to implement an energy management system based on international standards, such as the ISO 50001 standard.

6.1. Climate change

The Supplier shall support Ekinops in meeting its targets to reduce its Scope 3 GreenHouse Gas (GHG) emissions.

The Supplier shall measure and publicly disclose its Scope 1 and 2 GHG emissions according to the GHG protocol, and to the extent possible, Scope 3 GHG emissions. If Scope 3 emissions are not yet reported, the Supplier should demonstrate commitment to transparency by developing a roadmap with defined timelines and resources to progressively move towards disclosure. This data should be made available to Ekinops upon request.

The Supplier is encouraged to:

- Develop and implement a climate transition plan, including but not limited to the reduction of energy consumption, ideally in line with international best practices such as the “ACT step-by-step®” methodology.
- Set and publicly disclose its near term and long term GHG emissions reduction targets for Scope 1, 2, and to the extent possible Scope 3, and get them validated by the Science Based Target Initiative (SBTi).

6.2. Pollution

The Supplier must actively minimize pollution resulting from its operations, including air emissions, water discharges, and waste generation. The supplier shall implement measures to protect air, water, and soil quality.

6.3. Water resources

The Supplier is expected to assess its water resources use and to implement measures to control water usage at each stage of its operations.

6.4. Biodiversity

The Suppliers which may have a direct impact or dependency on biodiversity and/or ecosystems (including Key Biodiversity Areas) are expected to put in place a plan to minimize such dependency and all negative impacts on biodiversity and ecosystems preservation.

Supplier Code of Conduct

6.5. Circularity and waste management

The Supplier is encouraged to explore and implement best practices in terms of circularity in its products and services, from the design phase to the end-of-life treatment. The Supplier is expected to assess its resources use and to implement measures to limit the waste generated during the various stages of its operations, to limit its impact on the environment.

Suppliers managing "Electrical and Electronic Equipment" (EEE) are expected to adhere to the EU regulation on Waste from Electrical and Electronic Equipment (WEEE) and to control and manage harmful waste.

7. CONFLICT MINERALS

7.1. Purpose

As stated in our [Group Responsible Minerals Sourcing Policy](#), Ekinops is committed to responsible sourcing of minerals that respects human rights, avoids contributing to conflicts, and ensures transparent supply chains. Our objective is that no conflict minerals that originated in Conflict-Affected and High-Risk Areas (CAHRAs) are present in any Product sold to Ekinops Group. As part of our commitment to ethical business practices and sustainable supply chains, we require our suppliers concerned – *those providing components, assemblies, materials, or manufacturing services that may contain or rely on these minerals* – to adopt equivalent standards and cooperate with our due diligence program.

7.2. Scope

Conflict Minerals are defined as those originating from areas affected by conflict and high-risk (CAHRAs), such as Democratic Republic of Congo (DRC) and adjoining countries, as well as other conflict-affected or high-risk countries, linked to armed conflict and human rights abuses, support of corruption and money laundering, as well as environmental degradation.

Conflict Minerals include gold, wolframite, cassiterite, columbite-tantalite, and their derivative metals, which include tantalum, tungsten, and tin, sourced from areas identified as conflict regions, and commonly called the 3TG.

7.3. Supplier requirements

The Supplier concerned is aware that some minerals used for manufacture of electronic components and parts can originate from conflict zones where principles enacted in sections 1 to 6 above are subject to serious and repeated violations. Suppliers concerned are expected to take proactive steps to ensure that their products do not contribute to conflict, human rights abuses, or other adverse impacts associated with the extraction or trade of certain minerals:

- **Commit to responsible sourcing** and adopt a written minerals sourcing policy aligned with internationally recognized due diligence standards - in particular the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) - and communicate this policy through its organization and supply chain.

Supplier Code of Conduct

- **Provide accurate reporting** on minerals contained in their products, using recognized industry templates such as the CMRT (Conflict Minerals Reporting Template) and to the extent possible the EMRT (Extended Minerals Reporting Template), by using the latest version, when requested and at least annually.
- **Maintain records** supporting their reporting for a minimum of five (5) years and provide them upon request.
- **Manage supply chain risks** by prioritizing sourcing from audited or conformant smelters and refiners, addressing any identified issues, and cooperating with reasonable verification requests.
- **Cascade requirements** to their own suppliers and contractors to ensure transparency and responsible sourcing practices throughout the supply chain.

8. INFORMATION SECURITY

The Supplier is encouraged to implement an Information Security Management System (ISMS) based on international standards, such as the ISO 27001 standard.

The Supplier conducts an approach aimed at minimizing negative impacts to:

- Ekinops Information and Communication Technology (ICT) systems, services and products.
AND
- The Supplier's ICT systems and services directly or indirectly involved in its activities for Ekinops

Therefore, the Supplier implements state-of-the-art measures in the domains of:

- Network Security
- Access control
- Information classification, transfer and destruction
- Protection of ICT assets against physical and environmental threats
- Information security incident management
- Vulnerability and configuration management for ICT assets and services
- Supply chain management.

9. ARTIFICIAL INTELLIGENCE COMPLIANCE AND ETHICS

Artificial Intelligence (AI) Compliance and Ethics

Ekinops is committed to the responsible, transparent, and ethical use of Artificial Intelligence (AI) in compliance with the European Union AI Act and other relevant applicable laws.

We expect our Suppliers to adhere to the following principles:

Supplier Code of Conduct

Ethical Alignment: AI must be designed and used in accordance with ethical standards and corporate values. AI must not introduce or reinforce biases or lead to unfair treatment.

Transparency: AI-driven processes and decisions should be explainable and understandable to stakeholders.

Privacy & Data Protection: AI applications must comply with data protection laws, ensuring confidentiality and security of personal and sensitive data.

Accountability: Supplier remains responsible for the actions and outcomes of its AI systems.

Security & Integrity: AI must be safeguarded against unauthorized access, cyber threats, and misuse.

AI prohibited systems are those able to doing (but not limited to) any of the below:

- Deploying subliminal, manipulative, or deceptive techniques to distort behavior and impair informed decision-making, causing significant harm.
- Exploiting vulnerabilities related to age, disability, or socio-economic circumstances to distort behavior, causing significant harm.
- Social scoring, i.e., evaluating or classifying individuals or groups based on social behavior or personal traits, causing detrimental or unfavorable treatment of those people.
- Assessing the risk of an individual committing criminal offenses solely based on profiling or personality traits, except when used to augment human assessments based on objective, verifiable facts directly linked to criminal activity. Compiling facial recognition databases by untargeted scraping of facial images from the internet or CCTV footage.
- Inferring emotions in workplaces or educational institutions, except for medical or safety reasons.
- Biometric categorization systems inferring sensitive attributes (race, political opinions, trade union membership, religious or philosophical beliefs, sex life, or sexual orientation), except labelling or filtering of lawfully acquired biometric datasets or when law enforcement categorizes biometric data.

10. ALERT

10.1. ***Supplier grievance mechanism***

The Supplier must maintain or provide access to a grievance channel that allows employees, stakeholders, and affected communities to raise concern about any topic in this Code. Concerns may also be reported directly through Ekinops grievance mechanism.

Supplier Code of Conduct

10.2. Ekinops grievance mechanism

To collect all professional alerts, in particular those relating to the content of this Code of Conduct, Ekinops have set up an e-mail address to contact the Ekinops Group's audit committee President. This system, accessible to all, guarantees not only the confidentiality of the identity of the person making the report but also the confidentiality of the identity of the persons affected by the alert and of the information collected in this context. The alert system is accessible at the following address: compliance@ekinops.com.

11. RIGHT TO AUDIT

The Supplier shall maintain all, without restriction, documentation, books, and records, which Ekinops, or a third-party may audit, examine, at Supplier's expense. Ekinops may make those examinations only for the purpose of verifying the accuracy and compliance of the Supplier to the Code of Conduct.

Supplier Code of Conduct

12. REFERENCES

The following standards, directives, regulations, codes, templates and guidance were used in preparing this Code of Conduct and may be a useful source of additional information:

- [United Nations Universal Declaration of Human Rights](#)
- [United Nations Global Compact \(UNGC\)](#)
- [United Nations Convention Against Corruption](#)
- [United Nations Sustainable Development Goals \(UN SDG\)](#)
- [Fundamental conventions of the International Labor Organization \(ILO\)](#)
- [Section 1502 of the U.S. Dodd-Frank Act and the SEC conflict minerals rule](#)
- [EU Conflict Minerals Regulation \(2017/821\)](#)
- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [Responsible Minerals Initiative](#)
- [CMRT \(Conflict Minerals Reporting Template\)](#)
- [EMRT \(Extended Minerals Reporting Template\)](#)
- [IPC-1755-A Responsible Sourcing of Minerals Data Exchange Standard \(2019 amendment\)](#)
- [ISO 9001](#)
- [ISO 14001](#)
- [ISO 27001](#)
- [ISO 45001](#)
- [ISO 50001](#)
- [EU AI Act - Regulation EU 2024/1689](#)