



neways

Neways Electronics International N.V.

Supplier

Code of Conduct

Foreword by the Management Board

Dear supplier,

At Neways, we encourage and pursue an open and honest culture, we play a fair game and we take our corporate social responsibility. Our Supplier Code of Conduct guides us to achieve and uphold this, together with our suppliers. It describes our standards regarding daily business operations and supports us in conducting our business in an ethical way.

We have defined the principles we value most in this Supplier Code of Conduct, which applies to all companies, individuals and other business partners that provide their products or services to us, hereinafter referred to as supplier(s). We follow the Responsible Business Alliance (RBA), formerly the Electronic Industry Citizenship Coalition (EICC), Code of Conduct that applies to the electronics industry. In alignment with the UN Guiding Principles on Business and Human Rights, the provisions in this Supplier Code of Conduct are derived from and respect internationally recognized standards including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights. We apply those provisions to our (internal) Code of Conduct and our Human Rights Policy as well.

Clearly, it is impossible to describe exactly how you must act and behave in every unique situation. First and foremost, this is your own responsibility. This Supplier Code of Conduct aims to provide an important guideline for every supplier to meet our requirements for behavior and behavioral standards. You are therefore required to carefully read this Supplier Code of Conduct and to comply with it at all times. If at any time you do not comply with any of the principles set out in this Supplier Code of Conduct, we request you to inform us immediately.

Hans BÜthker CEO

Fiona Lam CFO

Steven Soederhuizen COO

Michiel van der Maat CCO

1. Labor

Our suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. We expect our suppliers to comply at least with the following labor standards.

1.1. Freely Chosen Employment

We do not tolerate situations in which persons are forced to work through the use of violence or intimidation, or by more subtle means such as retention of identity papers. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Workers shall not be required to pay employers' agents or sub-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.

1.2. Child Labor and Young Workers

Child labor is not to be used in any stage of manufacturing. The term child refers to any person under the age of 14 or 15, depending on the law of the country concerned permits, or under the age for completing compulsory education. Our suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers, especially young workers, shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers 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 laws and regulations. Suppliers shall provide appropriate support and training to all student workers.

1.3. Working Hours

Suppliers should recognise the right to rest and leisure and comply with the ILO-conventions, local laws, regulations and local customs with regard to working hours, overtime and rest. Suppliers should support a healthy balance between the working and private lives of their employees. Workweeks are not to exceed the maximum set by local law, except in emergency or unusual situations.

1.4. Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage

statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

1.5. Humane Treatment

There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

1.6. Non-Discrimination/Non-Harassment

Suppliers should be committed to a workplace free of harassment and unlawful discrimination. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

1.7. Freedom of Association

In conformance with local law, suppliers shall 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. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

Please also refer to our Neways Human Rights Standards and Commitments.

2. Health and Safety

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. We expect our suppliers to comply at least with the following health and safety standards.

2.1. Occupational Safety

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 and assessed, 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. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.

2.2. Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response 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. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

2.3. Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

2.4. Industrial Hygiene

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. If any potential hazards were identified, suppliers shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

2.5. Physically Demanding Work

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.

2.6. Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

2.7. Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the supplier or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

2.8. 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.

3. Environment

Suppliers recognize that environmental responsibility is integral to producing world-class products. Suppliers shall identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources within their manufacturing operations, while safeguarding the health and safety of the public. We expect our suppliers to comply at least with the following environmental standards:

3.1. Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

3.2. Pollution Prevention and Resource Reduction

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, or other means.

3.3. Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

3.4. Solid Waste

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

3.5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

3.6. Materials Restrictions

Suppliers are to adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

3.7. 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.

3.8. Energy Consumption and Greenhouse Gas Emissions

Suppliers are to establish a corporate-wide greenhouse gas reduction goal and promote a transition to a low-carbon economy. 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 and to the extent reasonably possible according to the GHG Protocol. Suppliers are encouraged to track Scope 3 greenhouse gas emissions. Suppliers are encouraged to make use of renewable energy sources and to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

3.9. Biodiversity, Land Use and Soil Quality

Suppliers are encouraged to adhere to zero-deforestation policies and contribute biodiversity preservation efforts; protect natural habitats within and around their operations and implement practices that prevent soil erosion, degradation, and contamination. All wood and paper-based products should as much as possible be sourced from sustainable and certified sources. Regarding land use, construction activities are done with minimal environmental disruption.

3.10. Land, Forest and Water Rights

Suppliers must respect and adhere to all local and national laws regarding land rights and land use or engage in forced evictions of local communities or indigenous peoples. Suppliers must not engage in or support forced evictions of local communities or indigenous peoples. Suppliers must comply with all water use regulations and respect the rights of local communities and ecosystems when sourcing water.

3.11. Private or Public Security Forces

Suppliers must ensure that the use of security forces complies with all applicable local, national, and international laws and regulations. Uphold human rights, including the right to life, dignity, and security, in all security operations. Prohibit the use of excessive force, torture, discrimination, or any other unethical or illegal practices. When hiring private security forces, ensure thorough background checks, qualifications, and certifications. Develop training programs that include human rights and conflict resolution to ensure the

professionalism of the security personnel. Sustainability requirements for your suppliers should cover use of private or public security forces

4. Ethics

To meet social responsibilities and to achieve success in the marketplace, suppliers and their agents are to uphold the highest standards of ethics including:

4.1. Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

4.2. 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, in order 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.

4.3. 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.

4.4. 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.

4.5. Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition are to be upheld.

4.6. 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. Our suppliers are expected to have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

4.7. Responsible Sourcing of Minerals

Our suppliers shall have policies to assure that the tantalum, tin, tungsten and gold (also known as 3TG) in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights in the Democratic Republic of Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available on request. We expect supplier support regarding conflict minerals-free compliance in their supply chain and thus deliveries to us. We also encourage and support our clients to follow the conflict mineral-free initiatives within the industry.

Please also refer to our Conflict Minerals Policy.

4.8. Privacy

Suppliers are to commit to protecting the reasonable privacy expectations of personal information 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 information is collected, stored, processed, transmitted, and shared.

4.9. Trade control

Our suppliers should comply with the applicable laws and regulations in the field of customs and export-inspections in the countries where operations take place. Export inspections mostly apply to transferring goods, services, hardware, software or technology. You shall strictly comply with the laws regarding export inspections. Violations of these laws and regulations may lead to substantial penalties, including fines and governmental revoking of simplified import and export procedures.

5. Management Systems

Suppliers shall adopt or establish a management system with a scope that is related to the content of this Supplier Code of Conduct. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations and products; (b) conformance with this Supplier Code of Conduct; and (c) identification and mitigation of operational risks

related to this Supplier Code of Conduct. It should also facilitate continual improvement. We expect that the management system of our suppliers contains at least the following elements.

5.1. Company Commitment

Corporate social and environmental responsibility policy statements affirming supplier's commitment to compliance and continual improvement, endorsed by executive management, and posted in the facility in the local language.

5.2. Management Accountability and Responsibility

The supplier clearly identifies senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

5.3. Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Supplier Code of Conduct.

5.4. Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with supplier's operations. Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5.5. Improvement Objectives

Written performance objectives, targets and implementation plans to improve the supplier's social, environmental, and health and safety performance, including a periodic assessment of supplier's performance in achieving those objectives.

5.6. Training

Programs for training managers and workers to implement supplier's policies, procedures, and improvement

objectives and to meet applicable legal, regulatory requirements and compliance with the Supplier Code of Conduct.

5.7. Communication

A process for communicating clear and accurate information about supplier's policies, practices, expectations, and performance to workers, suppliers, and customers.

5.8. Worker Feedback, Participation and Grievance

Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Supplier Code of Conduct and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

5.9. Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Supplier Code of Conduct, and customer contractual requirements related to social and environmental responsibility.

5.10. Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

5.11. Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

6. Implementation and Compliance Audits

Suppliers are expected to communicate the requirements of this Supplier Code of Conduct to all appropriate employees, suppliers or sub-contractors engaged in their supply chain. Suppliers should take steps to ensure that their suppliers and sub-contractors comply with requirements of this Supplier Code of Conduct.

Suppliers should also provide means for employees to report on or discuss non-compliance confidentially.

This Supplier Code of Conduct describes general rules. More specific behavioral rules may be defined in documents such as supply contracts or regulations or agreements with suppliers. Should any discrepancy exist between these general rules and more specific rules, then the latter prevails.

Compliance with legal requirements and this Supplier Code of Conduct may be regularly audited by us. You will in relation thereto provide us with all reasonable cooperation.

7. Reporting Suspected Misconduct

Any breach or concern related to this Supplier Code of Conduct should be reported to your Neways relationship manager immediately, allowing for joint verification of facts and remediation. Neways will not tolerate retaliation against any person for making a report or participating in an investigation of possible misconduct in good faith.

8. Disciplinary measures

We may take appropriate (disciplinary) measures for each violation of this Supplier Code of Conduct, including the right to recover all costs and damages. In such a process, we will act carefully and thoroughly and observe founding principles.



WE HEREBY AGREE TO COMPLY WITH THE PRINCIPLES SET OUT IN THIS SUPPLIER CODE OF CONDUCT

Company name: _____

Date: _____

Name: _____

Name: _____

Function: _____

Function: _____

Signature: _____

Signature: _____

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Approved by the Management Board and
the Supervisory Board

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