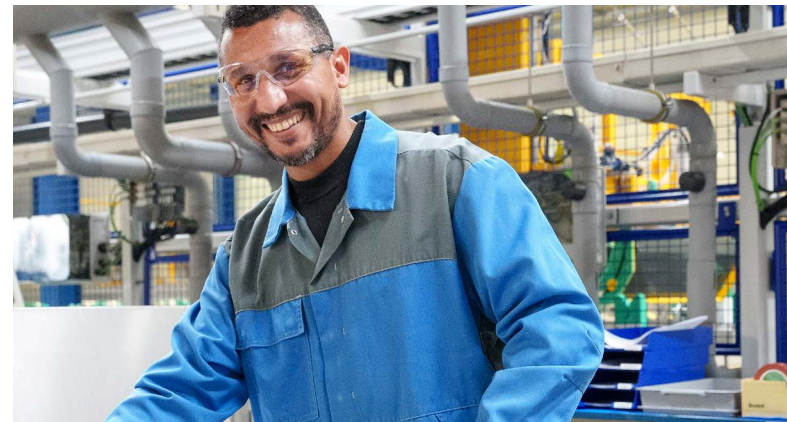




Cicor Group

Supplier Code of Conduct

March 2024 Version



Introduction

The relationship between Cicor and its suppliers, service providers and subcontractors of all kinds (hereafter referred to as “suppliers”) is an important component to building sustainable business success. The term “Cicor” as used herein comprises Cicor Technologies Ltd. and all its affiliated companies.

Cicor expects from its supplier’s full compliance with all applicable laws and regulations of the countries in which the suppliers’ operations are managed, goods are handled and/or services are provided.

In addition, the Cicor supplier Code of Conduct (hereafter referred to as the “Code”) formalizes the expectations that Cicor holds for its suppliers and throughout the supply chain. Whilst Cicor recognizes differences in cultures and legal requirements, Cicor expects that wherever suppliers are located, all businesses shall be conducted, as a minimum standard, in a manner compatible with this code.

Cicor has implemented a comprehensive supplier screening with Integrity Next. As a supplier of Cicor you are invited to fill in information to the tool and share important compliance information.

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Compliance with Laws

Suppliers must comply with all laws and regulations applicable to their business, including the local laws and regulations of all countries outside their home country in which operations are managed or services are provided.

Ethics Programme

Policies and Code of Conduct

Cicor expects suppliers to implement and adhere to their own written code of conduct, containing the expectations of this Code as a minimum standard, and to flow down their principles to the supplier they work with in providing goods and/ or services. Cicor expects suppliers to maintain effective programs that require their employees to make ethical, value driven choices in their business dealings including developing an employee code of conduct and supporting training.

Help and guidance

Cicor expects supplier to provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting. We expect suppliers to take action to prevent, detect and correct retaliatory actions.

Anti-Bribery & Corruption

Anti-Corruption Laws

Suppliers must comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business regardless of any local customs. This also includes compliance with anti-corruption laws that may have extra-territorial application.

Cicor expect suppliers to conduct reasonable due diligence to prevent and detect bribery and corruption in all business arrangements, including partnerships, the engagement of contractors and sub-contractors, joint ventures, offset agreements, and hiring of third-party intermediaries such as agents or consultants.

Illegal payments

Suppliers must not offer any illegal payments to or agree to receive any illegal payments from a customer, supplier, their agents, representatives or others. Cicor expects suppliers to prohibit their

employees from receiving, paying, and / or promising sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage. This prohibition applies even in locations where such activity may not violate local law.

Suppliers must not offer, promise, make, accept, or agree to accept any improper payments of money or anything of value to government officials, political parties, candidates for public office or other persons. This includes a prohibition on so-called facilitation or grease payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance unless there is a formal legal governmental fee schedule for such expediting services and the government provides receipts. Personal safety payments are permitted where there is an imminent threat to health or safety.

Fraud and Deception

Suppliers must not seek to gain an advantage of any kind by acting fraudulently, deceiving people, making false claims, or allowing anyone else representing them to do so. This includes defrauding or stealing and any kind of misappropriation of property or information.

Competition and Antitrust

Suppliers must not enter formal or informal anti-competitive arrangements that fix prices, collude, rig bids, limit supply or allocate/control markets. They must not exchange current, recent, or future pricing information with competitors. Suppliers must not participate in a cartel or any activity that would unlawfully restrain or impact competition.

Gifts / Business Courtesies

Cicor expects suppliers to compete on the merits of their products and services. Suppliers must not use the exchange of business courtesies to gain an unfair competitive advantage. In any business relationship, suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted

by applicable laws and regulations, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices. No cash gifts or cash equivalent should be offered or accepted.

Conflict of Interest

Cicor expects suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers will provide immediate notification to all affected parties if an actual or potential conflict of interest arises. This includes a conflict between the interests of Cicor and personal interests of those of close relatives, friends, or associates.

Product safety & quality

We expect suppliers to comply with all laws and regulations on product safety and quality whilst delivering products and/or services to agreed product safety and quality standards. Cicor expects suppliers to have in place quality assurance processes to identify any defects and implement corrective actions.

Human Rights

Cicor expects suppliers to conduct their business and operations in a way that respects human rights by treating their own workers, and people working for their suppliers, with dignity and promoting fair employment practices. This includes providing fair and competitive wages, prohibiting harassment, bullying and discrimination, prohibiting use of child, forced, bonded or indentured labour and not engaging in trafficking of persons for any purpose.

Child labour

Suppliers are expected to ensure that illegal child labour is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the international labour organization (ILO), whichever is higher.

Modern Slavery

Suppliers must prevent any involvement in all forms of modern slavery, including human trafficking, forced, bonded or indentured labour. All work should be voluntary on the part of the employee.

Cicor expects suppliers to provide all employee with a written contract in a language they understand clearly indicating their rights and responsibilities with regard to wages, working hours, benefits and other working and employment conditions. Suppliers should not retain any form of employee identification (passports or work permits), nor destroy or deny access to such documentation, as condition of employment unless required by applicable law.

Suppliers must not charge employees fees, recruitment costs or deposits, directly or indirectly as precondition of work.

Supplier must respect the right of workers to terminate their employment after reasonable notice and to receive all owed salary. Suppliers must respect the right of workers to leave the workplace after their shift.

Diversity and Inclusion

Cicor expects suppliers to foster a diverse and inclusive work environment where employees are treated with respect and fairness.

Suppliers are expected to provide equal employment opportunity to employees and applicants for employment without discrimination and comply with all applicable non-discrimination law and regulations.

Suppliers must ensure employment, including hiring, payment, benefits, advancement, termination, and retirement, is based on ability and not any personal characteristics such as the persons gender, origin, nationality, religion, union affiliation etc.

Harassment and Bullying

Cicor expects suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological, sexual and verbal harassment, intimidation or other abusive conduct.

Wage, Benefits & Working hours

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. Suppliers must not permit deduction from wages as a disciplinary measure nor permit any other deductions which are not provided by local law. Cicor expect supplier to provide employees with regulated hours of work, daily and weekly rest periods and annual leave at least to the extent required by local law.

Health and Safety

Cicor expects suppliers to establish an appropriate safety management system including policies aimed at protecting health, safety and welfare of employees, contractors, visitors, and others who may be affected by their activities by striving to eliminate fatalities, work-related injuries, health impairment and limit exposure to safety hazards. Suppliers should take reasonable steps to provide a hygienic working environment and must ensure that employees performance and safety is not impaired by alcohol, controlled substances, legal and illegal drugs.

Disciplinary and Grievance Mechanism

Cicor expects suppliers to have an employee disciplinary process in place to address concerns regarding employee work, conduct or absence. It is expected by Cicor that suppliers have a grievance mechanism for employees to raise a workplace problem or concern or to appeal a disciplinary decision.

Global Trade Compliance

Import

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, technical data, and services.

Export & Sanctions

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives and regulations including economic sanctions and embargos, governing the export and transfer of parts, components, and technical data and services. Suppliers shall provide truthful and accurate information obtain export licences and/or consents where necessary.

Responsible Sourcing of Minerals

Cicor expects suppliers to provide products made from materials, including constituent minerals that are sourced responsibly and support efforts to eradicate the use of any minerals which directly or indirectly finance, or benefit armed groups that

are perpetrators or of serious human rights abuses. Cicor expects suppliers to conduct due diligence and provide supporting data on their sources and supply chain of custody for these minerals when requested. In the event that the material “chain of custody” supplied is “indeterminable” or otherwise unknown the supplier is expected to either attain the appropriate certifications or phase out that material.

Counterfeit parts

Cicor expects suppliers to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of counterfeit parts and materials being delivered. Effective processes should be in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts re-entering the supply chain. If counterfeit parts and/or materials are detected or suspected, suppliers should provide immediate notification to the recipients of such counterfeit parts and/or materials.

Environment

Cicor expects suppliers to conduct their business in a manner that actively manages environmental risks across their operations, products, and supply chain. An appropriate environment management system including policies and procedures aimed at effectively managing their environmental performance, including integrating environmental considerations into their product or services should be established.

Suppliers are expected to improve their efficiency of energy, water, and natural resource usage, minimise waste hazardous materials, dispatch goods in an adequate outer packaging and foster reusable/recycled packaging materials and responsibly manage their air emissions.

Maintain Accurate Records

Cicor expects suppliers to have in place appropriate controls to create, maintain and store business records, and not to alter any record entry to conceal or misrepresent the underlying transaction represented by it accurately and securely. All

records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

Management of Risk

Cicor expects suppliers to actively manage their risks and not to pass down those risks inappropriately to subcontractors or third parties. Suppliers share information on relevant risks to ensure risks can be mitigated.

Information Protection

Cicor expects suppliers to ensure that all sensitive, confidential, and proprietary information is appropriately protected. Suppliers must comply with applicable data privacy laws on the collection, processing, and transfer of personal data an information. Suppliers must not use information for any purpose other than the business purpose for which it was provided unless there is prior authorization from the owner of the information. Suppliers must protect sensitive, confidential, and proprietary information of others, including personal data/ information, from unauthorized access, destruction, use, modification, and disclosure, through

appropriate physical and electronic security procedures, including mitigating emerging risk to information systems by implementing appropriate IT cyber security programmes.

Suppliers must comply with all applicable laws governing intellectual property rights assertions, including protection against disclosure. Suppliers and their personnel must not illegally use any material or non-publicly disclosed information obtained during their business relationship with Cicor as the basis for trading or for enabling others to trade in the stock or securities of any company.

Payment of Taxes

Suppliers must ensure they comply with all applicable tax laws and regulations in the countries where they operate and shall strive to be open and transparent with the tax authorities. Under no circumstances should suppliers engage in deliberate illegal tax evasion or facilitate such evasion on behalf of others.

Timely Payment of suppliers

Cicor expects supplier to be fair and reasonable in their payment practices and pay undisputed and valid invoices on time in accordance with agreed contractual payment terms.

Duty to inform

A supplier shall immediately inform Cicor in writing as soon as the supplier becomes aware of has sufficient reason to assume that the supplier or one of its sub-suppliers in its supply chain is in breach of the Code or its own Code of Conduct, unless as an impact on the business relationship between Cicor and the supplier can be excluded. Aforesaid duty to inform shall apply in particular in case of a supplier or one of its sub-suppliers being subject to official investigations by competent authorities or to court proceedings and at least one of the reasons is a non-compliance with standard that are the same or similar the ones established by the code.

Suspension and Termination of Contracts

In the event of a Non-Compliance Case, Cicor is entitled to immediately suspend any affected contract/s and any performance thereunder until the Non-Compliance Case has been remedied or been solved in another way. Cicor is further entitled to terminate any affected contract/s with immediate effect, if

- the Non-Compliance Case is of a kind that it cannot be remedied or solved
- the supplier refuses or does not take any remedial action or fails to remedy the Non-Compliance Case within reasonable period set by Cicor, or
- it is a repeated or severe Non-Compliance Case and Cicor cannot reasonably be expected to continue the affected contract/s.

The aforesaid rights are without prejudice and in addition to any rights Cicor is entitled to under contract or applicable law because of a Non-Compliance Case committed by a supplier, in particular with regard to claim damage compensation or indemnification.

Supplier Self-Assessment

For evaluation purposes Cicor is entitled to request from the supplier the completion of a suitable supplier self-assessment, including updates of an already given self-assessment. The supplier will co-operate as far as it can reasonably be expected. Invitation and questionnaires requested by Cicor and its supply chain compliance tool (Integrity Next) are expected to be answered within the deadline as mentioned by Cicor.

Signature Page

Place, Date

Name of supplier

Supplier signature 1

sign here

Supplier signature 2

sign here

Report a concern



Integrity Line

Anonymous reporting possible.
cicor.com/integrity

by e-mail

compliance@cicor.com

by mail

Cicor Management AG
Compliance Office
Gebenloostrasse 15
9552 Bronschhofen
Switzerland



cicor.com



[Cicor Group](https://www.linkedin.com/company/cicor-group)



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