SUPPLIER CODE OF CONDUCT

This Code of Conduct sets out minimum requirements for all companies that supply goods or services to Hailo (hereinafter "Supplier"). These minimum requirements represent Hailo's values and shall apply to any and all suppliers as well as their subsidiaries and branches worldwide.

1. Compliance with applicable laws:

Supplier shall at all times act in full compliance with all applicable laws, rules and regulations (hereinafter referred to collectively as the "Laws").

2. Working conditions

Supplier must uphold the human rights of its employees and treat them with dignity and respect.

a. Supplier may only employ employees who have reached the minimum age required by law, but in no case persons under the age of 16, even if local laws permit this. Notwithstanding this, suppliers may allow persons aged 15 and over to work within the framework of an apprenticeship programme. Such apprenticeship training must be permitted under the laws of the respective country and offer training in one or more specifically named industrial training occupations as part of enrolment at an educational institution.

b. Supplier shall not participate in nor use forced labour, slave labour, bonded labour, or human trafficking.

c. At Supplier's sites, working hours, wages and payment of overtime must be regulated in accordance with all applicable laws. Employees must be paid at least the statutory minimum wage or a wage that is typical in the local industry.

d. Supplier shall employ employees solely on the basis of their professional skills. Supplier shall not carry out nor authorise corporal punishment. Supplier shall not threaten violence and shall not actually use it. Supplier shall not engage in discrimination or harassment based on gender, race, skin colour, religion, ethnicity, social origin, age, sexual orientation, national origin, disability, political opinion, or any other characteristic protected by law.

e. Supplier shall respect the right of employees to join or refrain from joining any organisation permitted by law, including trade unions and works councils

3. Health & Safety

It is important to Hailo to be a global leader in safeguarding the health and safety of employees, officers, directors, agents and contractors (hereinafter referred to as "Personnel").

a. Supplier shall comply with safety guidelines and any site-specific safety requirements or protocols while working on-site at a Hailo location or on behalf of Hailo at a Hailo customer's location.

b. Supplier:

i. Shall bear responsibility for the health and safety of its Personnel.

ii. Shall ensure a safe working environment and minimise physical and chemical hazards through proper design, engineering and administrative controls, preventive maintenance and safe work practices, as well as ongoing safety training.

iii. Shall provide workers with suitable personal protective equipment for those activities where the hazards involved cannot be adequately countered by other means. iv. Shall provide and maintain physical safeguards, interlocks and barriers where machinery poses a potential injury hazard to workers.

v. Shall minimise the impact of emergency situations by implementing emergency plans and measures.

vi. Shall conduct training and ensure that its personnel are adequately trained and educated with respect to health and safety matters

4. Environment

At Hailo, environmental protection is an integral part of our business practice.

a. Supplier shall obtain all necessary environmental permits and authorisations and comply with the operational requirements and reporting obligations specified therein

b. Supplier shall comply with the specifications for regulated substances and product contents and all applicable laws prohibiting or restricting the use, contents and handling of certain substances, including, but not limited to, RoHS and REACH, as well as similar laws. Supplier shall provide Hailo with any and all information relating to the aforementioned substances and product contents, including, but not limited to, material declarations, where applicable

c. Supplier shall minimise pollution of the environment and shall effect continuous improvements to reduce or eliminate waste, wastewater and air emissions by implementing appropriate protective measures in its production, maintenance and factory processes.

d. Supplier shall treat, control, recycle and/or dispose of waste, wastewater and/or air emissions generated from its operations, even if they are not hazardous materials, in a manner compliant with applicable laws

5. Ethics and compliance

Supplier shall agree to comply with the highest standards of ethical behaviour in its dealings with its Personnel, suppliers, customers and other relevant stakeholders.

a. Supplier shall correctly and completely report and disclose information regarding its business activities, structure, financial position and performance in accordance with applicable laws and standard industry business practices

b. Supplier shall prohibit any form of fraud, extortion, theft or embezzlement by its Personnel

c. Supplier shall safeguard any and all intellectual property rights and shall protect Hailo's information. Any transfer of technologies and expertise shall take place while maintaining any and all intellectual property rights.

d. Supplier shall utilise processes and procedures and exercise due diligence to identify and exclude counterfeit products

e. Supplier shall ensure that the products sold to Hailo do not contain any so-called "Conflict Minerals" (minerals that are fused with tin, tantalum, tungsten and gold) that are sourced from entities that directly or indirectly finance the conflict in the Democratic Republic of Congo or neighbouring countries.

f. Supplier shall implement processes that ensure the anonymity and protection of employees who, in good faith, raise concerns, make reports or assist in an investigation in connection with potential ethical misconduct or possible criminal offences.

6. Fighting corruption

Hailo is committed to complying with any and all anti-corruption laws. They prohibit bribes, kickbacks or other corrupt measures aimed at attracting or retaining customers or gaining an unlawful advantage.

a. Neither bribery nor non-transparent commissions. Supplier may neither directly nor indirectly accept bribes, non-transparent commissions, or other improper payments from persons or organisations, nor offer these to them. This shall, inter alia, also apply to government authorities, individual government representatives, private companies as well as the Personnel of such private companies.

b. Gifts, entertainment and hospitality. When conducting business with or in the name of Hailo, Suppliers shall be permitted to do the following for legitimate business purposes: (i) offer gifts, entertainment or hospitality to subcontractors, customers or other business partners, (ii) accept gifts, entertainment or hospitality from subcontractors, customers or other business partners, provided that the gifts, entertainment or hospitality in each case:

- are unsolicited,
- are neither illegal nor constituting a violation of this Code;
- do not constitute a bribe, non-transparent commission nor any other unlawful payment,
- are not offered in exchange for any kind of consideration,
- would not damage Hailo's reputation in any way if disclosed; and
- do not create the appearance (nor bring with them any actual or implied obligation) that the giving party would be entitled to preferential treatment, the award of a contract, better prices or more favourable terms and conditions of sale.

7. Monitoring of compliance

Supplier shall grant Hailo and/or its representatives or authorised agents access to its sites and to any and all relevant documentation in connection with the products and services provided to Hailo. Supplier and Hailo shall mutually agree on the date and time of such access. However, Hailo may also need immediate access to the products, services and related documentation due to risks to its business, and suppliers must comply with requests related thereto. Supplier shall further assure Hailo of its cooperation in the investigation of allegations of misconduct, wrongdoing or corruption.

8. Application

Supplier shall contractually require its suppliers and/or subcontractors to comply with standards of behaviour that are consistent with the provisions of this Code. Hailo reserves the right to audit the suppliers and/or subcontractors of the Supplier for compliance with this Code and Supplier shall enable Hailo to carry out the audit, as necessary. Supplier shall also ensure that its Personnel complies with the provisions of this Code when providing goods or services to Hailo.

9. Violation

Supplier shall immediately notify Hailo of any known violations of this Code and shall take appropriate countermeasures to remedy the violation within a specified period of time (which shall be communicated to Hailo in writing). Hailo reserves the right to terminate the business relationship by, among other things, suspending the placement of future orders and possibly discontinuing ongoing production. Hailo reserves the right to hold Supplier liable for any and all reasonable costs incurred in investigating a violation.

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