

SUPPLIER CODE OF CONDUCT

1. Introduction

In an era where businesses play a crucial role as catalysts for change, Avit (Avit Group B.V., its subsidiaries and affiliates) is unwavering in its commitment to fostering responsible and ethical business practices. Our Supplier Code of Conduct (SCC) serves as a testament to our dedication to high standards of Corporate Social Responsibility, emphasizing principles of transparency, sustainability, and social responsibility.

This SCC outlines the expectations Avit holds for its Suppliers, encouraging a collaborative effort in shaping a business environment that aligns with our core values.

The SCC defines minimum requirements that all Suppliers shall comply with. Applicable laws that are more specific and contractual provisions with a higher standard shall supersede these general minimum requirements.

2. Scope of Application

In our pursuit of ethical business practices, we recognize that our Suppliers play a pivotal role in realizing our vision. All entities entering into contracts with Avit - be they corporations or individuals, suppliers, service providers, subcontractors, or consultants - are regarded as Suppliers.

3. Principles of Ethical Business Practices

Suppliers must comply with the principles set forth in this SCC. In addition to complying with the SCC, Avit expects its Suppliers to comply with all applicable laws and regulations.

3.1 Upholding Integrity in Business Transactions

Integrity is the cornerstone of ethical business transactions. Avit maintains a zero-tolerance policy towards bribery, corruption, and influence peddling in any form. Suppliers are expected to actively combat these malpractices, adhering to both local and international anti-bribery and anti-corruption laws. Transparency and accountability in financial dealings are non-negotiable, ensuring a business environment built on trust.

3.2 Addressing Conflicts of Interest

Conflicts of interest can undermine the foundation of ethical business. Suppliers are required to proactively identify and address conflicts that may compromise the best interests of Avit. Open communication is encouraged, and any potential conflicts must be promptly disclosed, allowing for transparent and ethical decision-making.

3.3 Compliance with Economic Sanctions Laws and Anti-Money Laundering Regulations

Adherence to trade laws and anti-money laundering regulations is crucial to maintaining the integrity of business relationships. Suppliers must familiarize themselves with and comply with all applicable sanctions, export control laws, and anti-boycott regulations. A commitment to preventing any actions that may expose Avit to legal penalties is paramount.

3.4 Ensuring Fair Competition Practices

Fair competition is the bedrock of a healthy business environment. Avit expects its Suppliers to operate within the bounds of anti-trust and competition laws in all countries where they conduct business. Emphasis is placed on fostering competition based on merit, ensuring a level playing field for all market participants.

3.5 Intellectual Property Rights and Confidentiality

Intellectual property rights and confidential information are the lifeblood of innovation and competitiveness. Suppliers must not only respect but actively enforce these rights, including those belonging to Avit. Measures to prevent unauthorized disclosure or use of confidential information are imperative, contributing to an environment that values and protects intellectual property.

3.6 Data Privacy and Security Measures

The protection of personal data is of utmost importance. Suppliers entrusted with processing personal data must comply with applicable laws and implement robust technical and organizational security measures.

In the event of a potential or actual data breach, Suppliers processing personal data on behalf of Avit shall inform Avit as soon as possible and without any undue delay (by phone +31880321018 and, in addition, by email privacy@avitgroup.com). Suppliers shall further take all reasonable steps, defined jointly with Avit, to mitigate the effects of a data breach.

3.7 Environmental Stewardship

In the face of global environmental challenges, Avit is committed to working with Suppliers who share its commitment to environmental stewardship. Compliance with relevant environmental laws is just the starting point; Avit encourages Suppliers to proactively take steps to reduce their environmental impact, preserve biodiversity, and contribute to global efforts to combat climate change. Suppliers commit to:

- actively work towards minimizing their carbon footprint by implementing and continuously improving measures to reduce greenhouse gas

emissions associated with their operations, products, and services;

- adopting circular economy principles, striving to minimize waste and extend the life cycle of products and materials;
- take measures to minimize waste generation and promote responsible waste management practices, including recycling and proper disposal methods;
- align their operations with the goal of achieving Net Zero emissions by the year 2040;
- ongoing efforts in identifying and implementing innovative practices that contribute to environmental sustainability, social responsibility, and sound governance.

3.8 Promoting Human Rights

Suppliers must align with international declarations such as the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights. Suppliers shall respect and uphold human rights including the following:

- *Freedom of Associations and Right to Collective Bargaining:* Support for workers' right to form or join trade unions and other organizations.
- *Working Hours and Compensation:* Full compliance with applicable laws relating to working hours, wages, and benefits.
- *Support to Diversity and Inclusion:* Promotion of diversity and inclusion in all workplaces.
- *Protection of Privacy:* Commitment to the right of privacy and freedom of expression, with measures in place to protect employee personal data.
- *Security:* Implementation of measures to ensure the security of workers, premises, and equipment without compromising human rights;
- *Prohibition of Discrimination and Harassment:* Prohibition of all forms of discrimination and harassment against employees based on, but not limited to, personal characteristics such as race, color, religion, gender, age, political opinion, national origin, social origin, pregnancy and maternity, disability, medical condition, marital status and sexual orientation.
- *Prohibition of Child Labor:* Prohibition of employment and exploitation of children under the age defined in ILO Convention number 138, or under the legal minimum age for employment in the relevant country, whichever is higher;
- *Prohibition of Forced Labor, Human Trafficking, and Freedom of Movement:* Strict prohibition of forced or compulsory labor, ensuring all work is conducted on a voluntary basis.

3.9 Ensuring Workplace Safety

Providing a safe and healthy workplace is a joint commitment. Suppliers must comply with health and safety laws. All work performed on behalf of Avit must strictly adhere to applicable safety policies and processes, with detailed reporting of any accidents.

4. Audit and inspection

To verify Suppliers' compliance, Avit reserves the right to audit Suppliers and inspect Suppliers' operations and facilities, upon reasonable notice, with Suppliers' consent. Such consent shall not be unreasonably withheld. If the results of such an audit or inspection show that a Supplier does not comply with this SCC, this Supplier shall take necessary corrective actions in a timely manner as directed by Avit.

5. Reporting and taking appropriate action

Timely reporting of SCC breaches is crucial for swift and effective action. Suppliers must promptly notify Avit in writing any identified risks to and violations of this SCC via legal@avitgroup.com. Suppliers shall take appropriate corrective actions to prevent, end or mitigate the risk or violation.

6. Consequences of non-compliance

If a Supplier fails to comply with this SCC, or fails to take necessary corrective actions to remedy violations of this SCC within a reasonable timeframe, Avit reserves the right to take action against such Supplier, including suspending or terminating the business relationship.

7. Conclusion

This SCC exemplifies Avit's unwavering commitment to ethical, responsible, and sustainable business practices. Adhering to these comprehensive guidelines is not only a legal requirement but a testament to our shared dedication to shaping a business environment that prioritizes transparency, integrity, and social responsibility.