

Feilo Sylvania Group
Supplier Code of Conduct

- Global -

This Code of Conduct defines the basic requirements and expectations placed on suppliers of goods and services to **Feilo Sylvania International Group Kft.** (22 Népfürdő utca, H-1138 Budapest) and its affiliated companies (hereinafter referred to as “**FSIG**” or “**Feilo Sylvania**”) concerning their responsibilities towards their stakeholders, affected groups and the environment. This Code of Conduct base on the principles of the United Nations global compact¹, the RBA² (Responsible Business Alliance) code of conduct as well as the relevant norms of UN³/ILO⁴ and OECD for the individual topics. Supplier agrees that it shall conform to these requirements as follows.

Legal Compliance

Supplier shall comply with the laws and legal requirements governing the business of Supplier, and the cooperation areas of FSIG and Supplier.

Supplier shall always ensure that it has and maintains all the licences, permissions, authorisations, consents and permits that it needs to carry out its obligations and shall at its expense maintain its facilities in providing the goods or services with all applicable state and regional rules and regulations including but not limited to any applicable environmental, chemical control and health and safety laws.

Ethical Behaviour in Supplier’s Working Organization and in its Supply Chain

Supplier shall ensure that its Goods to be supplied and Services to be rendered are ethically and legally sourced.

Supplier acknowledges that it is aware of the international treaties prohibiting child work. Supplier undertakes that it shall not tolerate any form of modern slavery, forced labour and human trafficking. Supplier warrants, represents, and covenants to FSIG that its activities – and the activities of its supply chain - are conducted in full compliance and respect of human rights, especially the UK Modern Slavery Act 2015.

Supplier shall ensure that none of its employees or employees of its sub-contractors (hereinafter jointly referred to as “employees”) shall be subjected to unethical recruitment practices, and Supplier will ensure that employees shall be subject to equal opportunities irrespective of skin colour, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age and that it shall respect the dignity, privacy and rights of each individual. Supplier shall not tolerate any unacceptable treatment of employees, such as mental cruelty, sexual or other harassment or discrimination. Supplier shall maintain its working organisation keeping in mind the concept of fair treatment.

Anti-Bribery

Supplier represents, warrants and covenants to FSIG, that in carrying out its responsibilities, neither the Supplier, nor any of its equity holders, beneficial owners, partners, officers, directors, employees or agents, shall directly or indirectly, offer, pay, promise to pay, or authorise the payment of any money or offer, give, promise to give, or authorise the giving of anything of value to any official or

employee of any Government or any department, agency, or instrument thereof, any political party or official thereof, or to any candidate for political office, or any official or employee of any public international organisation, in each case for the purpose of illegally influencing any act or decision of such official, employee, party or candidate or inducing such official, employee, party or candidate to do or omit to do any act in violation of the lawful duty of such official, employee, party or candidate or securing any improper advantage for Supplier or FSIG. Supplier further warrants, represents and covenants that in placing any orders or contracts with its own suppliers it shall not receive, request, accept, offer or expect to receive any illegal financial inducement or other illegal benefit from its suppliers or any third party.

Fair Competition

Supplier warrants that it shall conduct its business in a manner which promotes fair and lawful competition. Supplier shall not disclose to competitors any confidential information concerning prices, output, capacities, sales, bids, profits, profit margins, costs methods of distribution or any other parameters that determine or influence competitive behaviour with the aim to solicit parallel behaviour from competitors. Nor shall Supplier enter in any agreement with a competitor not to compete, restrict dealings with suppliers or customers, to submit bogus offers for bidding or to divide up customers, markets, territories, or production programs. The Supplier warrants that it shall in no way attempt to define the amount or the minimum amount of the resale prices of the products supplied. The Supplier shall not attempt to restrict the export or import of the goods supplied by FSIG and placed on the market in the European Union within the territory of the European Union.

Health and Safety Expectations

Supplier shall ensure that it takes all reasonable precautionary measures against accidents and occupational diseases. Supplier shall provide for its employees and external workers an adequate amount of training for all to act in accordance with the applicable statutory requirements and prevailing industry standards.

Supplier shall keep up a safe, healthy, and drug-free workplace. Supplier shall provide its employees with all the necessary protective gears as required by the prevailing laws and industry standards.

Environmental Expectations

Feilo Sylvania must contribute to an ecologically sustainable development. We work actively and systemically to reduce any negative environmental impact, and we always prefer using resources as efficiently as possible.

Feilo Sylvania expects its suppliers to take their share of responsibility in these matters and be able to demonstrate active control over their environmental impact, preferably through a certified environmental management system.

Supplier shall ensure that it takes all reasonable precautionary and controlling measures for the sake of environmental protection, including regarding hazardous substances and wastewater management, according to the applicable statutory requirements and prevailing industry standards. Supplier shall make continuous improvements in its operational systems and organization on point to

minimizing the environmental footprint of its business, among others, to streamline its energy and resources consumption, and to eliminate or reduce its waste emissions and air pollution.

Management System

Participants shall adopt or establish a management system with a scope relevant to the content of this 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 Code of Conduct; and (c) identification and mitigation of operational risks related to the areas governed in this Code of Conduct. The Supplier shall also facilitate continuous improvement of such management system. All actions and implementations undertaken by Suppliers shall be in orientation with recognized management systems such as ISO 14001 and ISO 45001, preferably testified by a certificate.

Export Control Laws

Supplier shall ensure that none of the Goods and Services or any components or materials thereto are manufactured, performed in or sourced from any person in or operating out of or otherwise associated with any country on any restricted list of the European Union, the United Kingdom, the United States of America or the United Nations.

Conflict Minerals

Supplier warrants that it will comply with section 1502 of the United States Dodd-Frank Wall Street Reform and Consumer Protection Act, European Union Regulation 2017/821 together with any analogous legislation now or in the future incorporated in the European Union, the United Kingdom, or the United States or the country of selling conflict minerals free products. Supplier shall ensure that it uses its best efforts to promote amongst its Supply Chain compliance with the legislation defined in this section of the FSIG Code of Conduct, and that it shall monitor and audit its Supply Base on a regular basis from this aspect.

On demand the supplier must provide a report based on latest version of the RMI (Risk Mineral Initiative) CMRT (conflicts minerals reporting template⁵) within a time frame of 4 weeks.

Personal Data Protection and Data Security

Supplier agrees that where it should need to collect personal data from Feilo Sylvania, its employees, agents or other representatives, or from any of its suppliers, that it shall do this in accordance with the laws and regulations of the European Union and the United Kingdom, especially the General Data Protection Regulation of the European Union ("GDPR"). Supplier shall upon request provide Feilo Sylvania with a copy of its privacy policy. Where Supplier is providing Services then the Supplier may be a data processor or data controller (or co-controller) for the personal data of employees, representatives, or customers or consumers. Supplier shall ensure that it has in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction or damage of such data. Where appropriate the Supplier shall include such measures as pseudonymising and encrypting personal data to ensure confidentiality is maintained. Supplier shall ensure it has in place systems to ensure that data can be restored in a timely manner should this need arise and that all personnel who have access to and / or

process personnel data are obliged to keep the personnel data confidential and not transfer or process any personnel data outside of the United Kingdom or the European Economic Area unless in accordance with the relevant laws and regulations.

Audit

Supplier shall cooperate in good faith with FSIG in case FSIG initiates to audit the compliance of any provisions of this Code of Conduct at the Supplier company.

Name

Position

Date

¹ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

² <https://www.responsiblebusiness.org/code-of-conduct/>

³ <https://unric.org/de/wp-content/uploads/sites/4/2020/01/UDHR-dt.pdf>

⁴ http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---normes/documents/publication/wcms_087424.pdf

⁵ <https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>