

SUPPLIER CODE OF CONDUCT

TERMINATION TECHNOLOGY LTD
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**Termination
Technology Ltd**
Quality and Service

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Introduction

Termination Technology Ltd is dedicated to upholding the highest standards of product quality, safety, and business ethics. We are committed to ensuring safe working conditions within our supply chain, treating workers with dignity and respect, and maintaining environmentally friendly and safe manufacturing processes. We have established the Supplier Code of Conduct policy to achieve these goals. This policy outlines the fundamental requirements placed on our suppliers of goods and services, emphasizing their responsibilities towards stakeholders and the environment.

As a condition of doing business with us, Suppliers shall fully implement this Code of Conduct, and uphold these standards at all internal facilities and subcontractors. Suppliers are expected to post this Code of Conduct in a visible location which accessible to all employees and visitors (in the appropriate local language and the appropriate language for migrant workers that make up more than 10% of the workforce). Suppliers should communicate and train all workers annually concerning the elements of this Code of Conduct. These standards shall be enforced through the use of internal and independent third-party assessments.

Supplier Operations

Labour & Human Rights

Forced Labour: Suppliers must not use forced labour, including prison, indentured, bonded labour, slave labour or any form of coercion. Employees should not be compelled to work through force, intimidation, or as a means of political coercion or punishment for their political views.

Child Labour: Suppliers must not employ children below the age of fifteen (15) or below the age required for completing compulsory education, if higher than fifteen (15), in the country of manufacture.

Discrimination: Suppliers must not discriminate in recruitment and employment practices based on personal characteristics or beliefs. Decisions regarding hiring, salary, benefits, training, advancement, discipline, and termination should be based solely on job performance. Measures should be in place to protect migrant employees from discrimination and provide appropriate support services.

Wages, Benefits & Compensation: Suppliers must meet all legal requirements related to wages and benefits. Wages should equal or exceed the minimum or prevailing industry wage. Overtime should

be compensated at the legally required rate. Employees have the right to compensation that meets their basic needs and provides discretionary income. Steps should be taken to improve compensation and living standards if they do not meet these requirements.

Working Hours: Employees should not be required to work more than sixty (60) hours per week, including overtime, unless in extraordinary circumstances or limited by local regulations. The regular work week should not exceed 48 hours, and overtime should be voluntary and not a common occurrence. Employees should have at least twenty-four (24) consecutive hours of rest within a seven-day period and receive paid annual leave.

Freedom of Association & Collective Bargaining: Suppliers must respect employees' rights to join associations and engage in collective bargaining. Mechanisms should be developed to resolve industrial disputes and address employee grievances while maintaining effective communication.

Disciplinary Practices: Employees must be treated with respect and dignity. They should not be subjected to physical, sexual, psychological, or verbal harassment or abuse, nor fined or penalized as disciplinary measures.

Non-Retaliation Policy: Suppliers must publicize and enforce a non-retaliation policy that allows employees to express concerns about workplace conditions directly to factory management without fear of retribution or job loss.

Health & Safety

Suppliers must provide a safe and hygienic working environment, promoting practices that prevent accidents and injuries. They must ensure employees are protected from fire, accidents, and exposure to toxic substances. They are obliged to maintain adequate lighting, heating, and ventilation systems. Employees must have access to clean and sufficient sanitary facilities at all times. Suppliers agree to clearly communicate their health and safety policies to employees and apply the same standards to any residential facilities provided to employees.

Sustainability and Climate Action

Suppliers must continuously improve their environmental performance within their operations and require the same from their partners, suppliers, and subcontractors. This involves integrating sustainability principles into business decisions, responsibly utilizing natural resources, implementing cleaner production methods and pollution prevention measures, and designing products, materials, and technologies in accordance with sustainability principles.

Suppliers are expected to prioritize reducing their environmental impact. To achieve this, Termination Technology Ltd has the following expectations:

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- Comply with all relevant environmental laws, regulations, and operating permits.
 - Handle, transport, and dispose of hazardous materials safely and in an environmentally responsible manner, following applicable laws.
 - Minimize the environmental impact of all business operations and responsibly manage natural resources.
 - Implement measures to manage the proper discharge of solid waste, wastewater, and air emissions, adhering to applicable laws.
 - Fulfil environmental reporting requirements with transparency and accuracy.
 - Engage with environmental regulators with integrity.
 - Emphasize the reduction, reuse, and recycling of materials whenever feasible.

Supplier Practices

Responsible Sourcing

Suppliers are expected to take responsibility for ethically and environmentally sustainable sourcing of their materials, particularly those obtained from high-risk and conflict-affected areas. Our expectations for Suppliers are as follows:

Responsible Sourcing: Suppliers must exercise due diligence when selecting suppliers and subcontractors, ensuring responsible sourcing practices throughout the supply chain. Suppliers should not source raw materials or components from organizations or individuals involved in illegal activities such as money laundering, terrorism, or human rights abuses, including child labour, modern slavery, and human trafficking.

Supplier Due Diligence: Suppliers are required to monitor and conduct appropriate due diligence on their own suppliers, addressing risks related to ethical, legal, environmental, and labour supply chain concerns outlined in this Code of Conduct Policy.

Conflict Minerals: Supplier compliance with all applicable conflict minerals laws and international regulations is expected.

Auditing Facilities: Suppliers should allow Termination Technology Ltd to audit any facility or third-party supplier that provides any materials or services which are used in the production of any goods for Termination Technology Ltd.

Trade Compliance

Termination Technology Ltd are committed to compliance with import and export laws, regulations, and procedures wherever we operate. We expect a similar commitment from our Suppliers.

Therefore, we expect our Suppliers to:

- For all applicable jurisdictions, comply with all relevant export controls, sanctions, antiboycott laws and customs regulations when exporting or importing goods or technology, and apply for and obtain all necessary authorizations and permits to ensure the timely and compliant delivery of products.
- Provide Termination Technology Ltd with all relevant trade-related information including, but not limited to, product classification details, country of origin and tariff classification to facilitate Termination Technology Ltd.'s full compliance with applicable export control, sanctions or customs legislation.

Suppliers shall not:

- Provide Termination Technology Ltd with any product, material or service from a country, person or entity that is subject to regulations that restrict transactions with specific foreign entities, persons or countries (often referred to as denied, debarred and or restricted parties).

Ethics

Termination Technology Ltd expects our Suppliers to uphold the principles of legality, ethics, and fairness and to fully comply with relevant legislation and the standards outlined in this Code. Our expectations for Suppliers are as follows:

Compliance: Suppliers must adhere to all applicable laws and regulations, including anti-bribery/corruption, anti-money laundering, antitrust and competition, boycotts, lobbying, payments to government officials, political donations, and other related laws.

Land Rights: Respect the land rights of individuals, indigenous people, and local communities affected by sourcing practices, supply chains, and operations.

Reporting: Suppliers are encouraged to report any actual or perceived legal or ethical violations they encounter.

Conflicts of Interest

Suppliers should avoid any interactions with Termination Technology Ltd team members that may create a conflict of interest or appear to do so, compromising the team members' duty to act in the best interest of Termination Technology Ltd. Gifts, travel, entertainment, or other benefits offered or provided to third parties on behalf of Termination Technology Ltd should be reasonable, infrequent, modest in price and appearance, and consistent with this Code and applicable law.

Product Quality & Safety

Our expectations for Suppliers are as follows:

Quality: Meet recognized quality requirements, ensuring goods and services consistently meet Termination Technology Ltd.'s needs, perform as warranted, and are safe.

Reporting: Promptly report quality issues or nonconformities identified after product/material shipment.

Instructions and Warnings: Provide clear instructions and warnings for product labelling, handling, transportation, use, and disposal in compliance with applicable laws.

Quality Audits: All suppliers must be fully transparent with Termination Technology Ltd and any third parties working on our behalf.

Traceability: All suppliers are required to map and continuously track all locations from which they source the products purchased from use in Termination Technology Ltd products. This information shall be available to Termination Technology Ltd upon request.

Record Keeping: Suppliers will maintain accurate and transparent records concerning each of the elements of this Code of Conduct to allow for verification of compliance.

Anti-bribery & Corruption

We have a zero-tolerance policy towards bribery and corruption in any form. We strictly select partners who demonstrate integrity and ensure that their conduct always aligns with our standards. We prohibit the offering, giving, or accepting of anything of value that could improperly influence business decisions.

Moreover, we strictly prohibit making facilitation payments.

Supplier Commitment

Code Adherence

Suppliers shall comply with all aspects of the Termination Technology Ltd Supplier Code of Conduct, as mandated through the Termination Technology Ltd General Conditions of Purchase and or any bespoke agreement with Termination Technology Ltd.

Suppliers shall have policies and practices to implement these standards within their business effectively. Suppliers shall work collaboratively with us to assess and continuously improve their impact on the environment and society.

Termination Technology Ltd reserves the right to audit each of its Suppliers' compliance with this Code of Conduct document, including carrying out both announced and unannounced site audit visits. Suppliers are expected to permit, without hindrance, Termination Technology Ltd.'s internal or independent third-party compliance assessors.

At our request, Suppliers shall complete evidence-based assessments relating to their performance on environmental, social, and governance matters. They will share the results of such reviews with us. Suppliers shall ensure that documentation demonstrating compliance with this is retained and Suppliers shall give Termination Technology Ltd access to such documentation on reasonable notice.

Suppliers shall agree to the use by Termination Technology Ltd of their environmental, social, and governance-related information for the purposes specified in our agreements with our suppliers and as required by applicable law and or (in an anonymized format) for reporting publicly or to any customer of Termination Technology Ltd.

Compliance with this Supplier Code of Conduct is essential to Termination Technology Ltd. In the event of non-compliance by a Supplier with the requirements set out in this Supplier Code of Conduct, Termination Technology Ltd will seek to refer to its contractual rights with the Supplier, which may include the right to terminate the relevant agreement.

Working with others

Suppliers must ensure that all their interactions involve individuals or entities who uphold our standards in terms of reputation and conduct. This includes engaging with employees, agents, intermediaries, consultants, representatives, distributors, teaming partners, contractors, suppliers, consortia, and joint venture partners.

Suppliers are expected to actively listen to the requests and concerns of the community and respond appropriately. We encourage our Suppliers to actively seek opportunities to contribute to their local communities.

Business Partner Concerns

Our Suppliers are free to speak up about anything that concerns them, or that is not in line with the principles set out in this Supplier Code of Conduct without fear of retaliation. Termination Technology Ltd does not tolerate retaliation, and it expects its Suppliers to adopt the same.

We would like to know if our Suppliers violate any of these codes. Please bring these issues to our attention by emailing curtis.webb@termtech.co.uk. Please feel free to write in your local language. All information we receive will be kept in strict confidence, and your identity will be protected.

**Signed on behalf of Termination
Technology Ltd**

**Signed on behalf of (INSERT SUPPLIER
NAME HERE)**

**On the
Date Of:** _____

**On the
Date Of:** _____

**Location
Signed At:** _____

**Location
Signed At:** _____