

## VALUES AND COMMITMENTS IN THE ALTADIA GROUP IN RELATION TO DUE DILIGENCE COMMITMENTS IN THE SUPPLY CHAIN

**ALTADIA GROUP** and its subsidiaries subscribe to the highest standards of ethics and fair play in all our business practices. Our Code of Conduct and Ethics provides guidance for dealing with customers, suppliers, employees, and other stakeholders with integrity and in an ethical and appropriate manner. The policies in our Code of Conduct and Ethics are based on government laws and regulations and human rights and define the rules which we must comply with to conduct business.

We are therefore committed to providing a workplace that is safe, non-discriminatory and free from harassment, preserving the environment and strengthening the communities where we operate.

The Supplier Social Compliance Standards (SCS) – Reflecting **ALTADIA GROUP** values. These standards are based on our policies, practices and in our Code of Conduct and Ethics. We would like to share these values and standards so that they can be reflected in our relationships and actions in our workplaces and the workplaces of those who are authorized to directly supply our business.

We recognized that there are differences in laws, customs and economic conditions that affect business practices around the world. However, we believe that a mutual understanding and commitment to the SCS will strengthen our relationship. The SCS communicates our values and expectations and emphasize the importance of responsible workplace policies and practices that generally comply, at a minimum, with applicable occupational safety and health, environmental and labour laws and regulations. The standards outlined below reflect the values we uphold in our own policies, and we expect our suppliers to follow these standards and requirements.

### 1. **NON-DISCRIMINATORY EMPLOYMENT PRACTICES**

Committed to equal employment opportunity and fair employment practices without discrimination against race, ethnic group, gender, religion, sexual orientation, disability, marital status and age.

Apply to all aspects of employment, including recruitment, placement, training, compensation, and advancement of employees.

### 2. **WORK HOURS, WAGES AND BENEFITS**

Comply with the applicable labour laws and regulations on, but not limited to, benefits, working hours, wage payment, disciplinary procedures.

### 3. **PROHIBIT HARASSMENT**

Prohibit sexual harassment, intimidation or defamation of character whether committed by or against a supervisor, co-worker, customer, supplier or visitor.

### 4. **CHILD LABOUR**

Comply with all the applicable child labour laws including those related to hiring, wages, work hours, overtime and working condition. If children are found to be working directly for the supplier, the latter shall seek a sensitive and satisfactory solution that puts the best interests of the child first.

### 5. **FORCED LABOUR**

Prohibit all forms of forced labour including labour acquired through human trafficking, indentured labour, forced prison labour or slave labour. Hire only applicants who seek employment on a voluntary basis.

## **6. FREEDOM OF ASSOCIATION**

Respect employees' rights to join or form trade unions of their own choosing and bargain collectively as provided in the law.

## **7. SAFETY AND HEALTH AT THE WORKPLACE**

Strive to provide a secure, safe and healthy workplace. Maintain a productive workplace by complying with all applicable occupational safety and healthy laws, rules and regulations as well as by mitigating the risk of accidents, injury, and exposure to health risks.

## **8. PROTECTION OF THE ENVIRONMENT**

Comply with the Environment laws and regulations. Conduct operations in a manner that minimizes adverse environmental impact.

## **9. BUSINESS INTEGRITY**

Provide a workplace free of bribery and corruption with all applicable laws relating to bribery, money laundering and/or corruption as well as prohibiting the exchange of money or anything else of value to or from anyone, including government officials, to influence actions or obtain an improper advantage.

All transactions must be transparent and consistent with arm's length business basis and applicable law and not influenced by friendship or association.

## **10. COMPLIANCE WITH APPLICABLE LAWS AND STANDARDS**

Suppliers to the ALTADIA Group are required to generally comply with all applicable local and national laws, rules, regulations and requirements in their operations and in the provision of services.

## **11. DEMONSTRATION OF COMPLIANCE**

In order to minimally comply with the SCS, a facility/company must demonstrate the absence of non-compliances in each of the following: Non-Discrimination; Non-harassment; Abuse of Labour; Child Labour; Forced Labour; Freedom of Association; Working Conditions that present imminent threat or serious injury to employees; Impact on the environment; Corporate governance. All non-compliances against the SCS will be the responsibility of the supplier to ensure that they are addressed as part of its accountability and improvement. ALTADIA Group will consider this factor in selecting providers in future. We, therefore, expect our suppliers to develop and implement appropriate internal business processes to ensure compliance with the SCS.

In the event the supplier fails to fully comply with the SCS, ALTADIA Group reserves the right to issue corrective action and/or remedies including but not limited to possible temporary or permanent ban to the supply of goods/services to ALTADIA Group or any of its subsidiaries in its Group.

As part of our Integrated Management System, we are undertaking a self-assessment of our Suppliers. This will enable us to assess and approve them.

For this reason, we require our suppliers to complete the Self-Assessment questionnaire to see their commitment in governance, social issues, quality, health and safety and environment. This information and also those regarding the service, the price and the claims will be taken into account in order to assign a punctuation following our internal criteria. This evaluation will be carried out on a yearly basis.

If you want to know your punctuation, please do not hesitate to contact us.

**SUPPLIER COMPLIANCE SELF EVALUATION**

**SUPPLIER INFORMATION**

**Company Name:**

**Address:**

**Prepared by:**

**Position:**

**Date:**

**Contact Details** Phone: \_\_\_\_\_ EMAIL: \_\_\_\_\_

	No.	Question	YES	NO	In progress
<b>GOVERNANCE</b>	1)	Does the facility/company/group have an ethic code in place? If yes, if possible, please provide a copy			
	2)	Does the facility/company/group have a Social Compliance program? If yes, please attach a copy of your latest Social Compliance Audit Report and continue in question 10			
	3)	Does the facility/company/group have written personnel policies in place to prevent discrimination on race, ethnic group, gender, religion, sexual orientation, disability, marital status and age?			
	4)	Does the company/group promote equal opportunities for both genders?			
	5)	Does the company/group a policy for gender equality?			
	6)	Does the facility/company/group have procedures in place to ensure that the Labour laws are fully complied with regards to benefits, hours worked, rest day, holidays, termination/layoff, overtime and salary/payroll deductions?			
	7)	Does the facility/company/group comply with the legal minimum wage for standard working hours?			

No.	Question	YES	NO	In progress
8)	Does the facility/company/group have a formal, written policy that clearly states a commitment to prevent harassment and abuse in the workplace?			
9)	Does the facility/company/group have effective procedures to verify workers' ages to prevent employment of child labour?			
10)	Does the facility/company/group have a formal, written policy that clearly states a commitment to prohibit all forms of forced labour including labour acquired through human trafficking, indentured labour, forced prison labour or slave labour?			
11)	Are workers free to join or form trade unions or workers' organizations of their own choosing and collectively bargain, if permitted by law?			
12)	Does the facility/company/group comply with the GDPR or any applicable legislation regarding Data Protection? If yes, please provide copy of your policy.			
13)	Has the AEPD or any Data Protection Authority equivalent imposed a fine to the company/group within the last five years? If yes, provide details.			
14)	Does the company/group have a whistleblower channel? If yes, please provide the details.			
15)	Is the company/group or any related parties currently targeted by sanctions administered by the following bodies: UN, EU, UKHMT, HKMA, OFAC?			
16)	Does the company have any current business activity involving individuals, entities or organizations which are currently targeted by sanctions administered by the following bodies: UN, EU, UKHMT, HKMA, OFAC?			
17)	Does the company/group any business activity in Syria, North Korea, Crimea, Region of Ukraine, Sudan, Iran or Cuba?			
18)	Has the company/group had any legal proceeding as regards of any of the above questions within the last five years? If yes, please provide details.			

	No.	Question	YES	NO	In progress
	19)	Has the company/group its last beneficial owner placed in a tax heaven?			
	20)	Does the company/group have any fine or administrative sanction proceedings in place?			
	21)	Has been imposed to the company/group any fine or sanction in he last five years? If yes, is it a minor or serious offense?			
	22)	Does the company/group comply with the Universal Declaration of Human Rights and the Convention of the Rights of the Child?			
<b>HEALTH AND SAFETY</b>	23)	Does the company/group have in place a Health and Safety management system certified according with ISO 45001 or OHSAS? If yes, attached the certificate and continue in question 13			
	24)	Is the facility management system in compliance with applicable safety and health laws and regulations?			
	25)	Does the company/group/facility have a written policy and procedures that define its approach to safety and health practices?			
	26)	Does the facility have a written emergency response plan and fire evacuation procedure?			
<b>ENVIRONMENTAL</b>	27)	Does the company/group have in place an Environmental management system certified according with ISO 14001? If yes, attached the certificate and continue in question 17			
	28)	Is the facility management system in compliance with applicable environmental laws and regulations?			
	29)	Does the facility hold the necessary license(s) or permit(s) for (select all that apply)? <ul style="list-style-type: none"> <li>• Air emissions</li> <li>• Storage or use of hazardous substances</li> <li>• Wastewater management</li> </ul>			
	30)	Does the facility regularly test air emissions (i.e. NOx, SOx, mercury, hazardous air pollutants)?			

	No.	Question	YES	NO	In progress
	31)	Does the facility treat wastewater prior to off-site discharge?			
	32)	Has the company/group been Environmentally sanctioned in the last five years? If yes, please provide details.			
	33)	Does the company/group have an insurance policy? If yes, does it cover civil liability?			
	34)	Does the company/group have an Environmental/Pollution Liability Insurance? If yes, please provide policy's copy or certificate.			
<b>QUALITY</b>	35)	Does the company have in place a Quality management system certified according with ISO 9001? If yes, attached the certificate.			
	36)	Does the facility have a written policy and procedures that define its approach to quality?			
	37)	Do you carry out calibration of test equipment with traceable patterns?			
	38)	Do you carry out quality controls of the supplied products?			
<b>CONFLICT MINERALS (Gold, tin, tantalum, tungsten and Cobalt)</b>	39)	To ensure compliance with Conflict Minerals requirements, Altadia requires you to submit specific information.  If you are supply us these products, you should fill in the appropriate Conflict Minerals Reporting Template (CMRT) attached to this questionnaire.			
<b>PACKAGING</b>	40)	If your products are packaging, indicate if you are taking any sustainability initiative. Please send us additional information about it.			
<b>GENERAL</b>	41)	As a supplier of EIF Group, do you allow us or our advisors to visit and/or audit your facilities?			

As prove of conformity with the above:

Name and surname: \_\_\_\_\_

Identification Number/ Passport Number: \_\_\_\_\_

Place \_\_\_\_\_, Date: \_\_\_\_\_

*Signature and Stamp*

BASIC INFORMATION ABOUT DATA PROTECTION OF SUPPLIERS MANAGEMENT	
<b>Responsible:</b>	ALTADIA GROUP
	DPO: <a href="mailto:dpo@altadiagroup.com">dpo@altadiagroup.com</a>
<b>Purpose:</b>	Supplier Sel-Evaluation Contact information management
<b>Legitimation:</b>	Supplier Sel-Evaluation: Compliance assessment, legitimate interest of the Responsible Contact information management: Legitimate interest of the Responsible
<b>Assignments:</b>	Supplier Sel-Evaluation <ul style="list-style-type: none"> <li>- Service providers hired by the Organization</li> <li>- Other companies of the Group</li> </ul> Contact information management: <ul style="list-style-type: none"> <li>- Service providers hired by the Organization</li> <li>- Other companies of the Group</li> </ul>
<b>Recipients:</b>	Responsibles of the Treatment outside UE, taking into account "Privacy Shield"
<b>Rights:</b>	Access, rectify and delete the data, as well as other rights, as explained in the additional information.
<b>Additional information:</b>	You can request detail information about the treatment through <a href="mailto:dpo@altadiagroup.com">dpo@altadiagroup.com</a>

As prove of conformity about what has been mentioned above regarding the treatment of my personal data, I sign the following:

Name and surname: \_\_\_\_\_

Identification Number/ Passport Number: \_\_\_\_\_

Place \_\_\_\_\_, Date: \_\_\_\_\_

*Signature and Stamp*