SUPPLIER
CODE OF CONDUCT

Standards of Ethical, Social, and Environmental Conduct for Suppliers, Vendors, and Business Partners

This document applies to all suppliers, vendors, contractors, and business partners engaged by EFFECT Photonics BV and its subsidiaries worldwide.

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1. Introduction and Purpose

EFFECT Photonics BV (the "**Company**") is committed to conducting business ethically, lawfully, and in a manner that respects human rights, protects the environment, and promotes safe and fair working conditions. This Supplier Code of Conduct (the "**Code**") sets out the minimum standards the Company expects of all suppliers, vendors, contractors, agents, and other business partners (collectively, "**Suppliers**") that provide goods or services to the Company.

The Company expects Suppliers to share this commitment and to operate in a manner consistent with the principles outlined in this Code, throughout their own operations and their supply chains, including subcontractors and lower-tier suppliers.

Scope

This Code applies to all Suppliers, and their employees, agents, and subcontractors, engaged in the manufacture, provision, or delivery of goods or services to the Company, regardless of geographic location. Suppliers are responsible for ensuring that this Code, or standards substantially equivalent to it, are communicated to and observed by their own suppliers and subcontractors.

Relationship to Local Law

Where this Code establishes standards higher than those required by applicable local law, Suppliers are expected to meet the standards of this Code. Where local law establishes a higher standard than this Code, the higher standard shall apply. In all cases, Suppliers must comply with all applicable laws and regulations in the countries in which they operate.

2. Legal Compliance

Suppliers must conduct their business in full compliance with all applicable laws, rules, and regulations of the countries in which they operate, including but not limited to laws relating to labor, immigration, health and safety, environmental protection, import/export controls, anti-corruption, data protection, and trade sanctions.

- Maintain all licenses, permits, and registrations required to operate lawfully.
- Comply with all applicable trade, customs, and export control regulations.
- Comply with data privacy and information security laws applicable to any Company data handled by the Supplier.

3. Labor and Human Rights

Freely Chosen Employment

Suppliers shall not use forced, bonded, indentured, or involuntary prison labor. Workers must be free to leave employment after reasonable notice, and must not be required to surrender government-issued identification, pay recruitment fees, or post deposits as a condition of employment.

Prohibition of Child Labor

Suppliers shall not employ workers under the minimum legal working age in the country of employment, or under the age of 15 (or 14 where permitted by local law and ILO Convention 138), whichever is greater. Suppliers must implement appropriate age-verification procedures during hiring.

Freedom of Association

Suppliers shall respect the rights of workers to freely associate, organize, and bargain collectively in accordance with local law, without fear of reprisal, intimidation, or harassment.

Non-Discrimination and Anti-Harassment

Suppliers shall provide a workplace free from harassment and unlawful discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, marital status, or any other characteristic protected by applicable law.

Working Hours, Wages, and Benefits

Suppliers shall compensate workers with wages, overtime premiums, and benefits that meet or exceed the minimum standards required by applicable law. Working hours must comply with applicable laws and shall not exceed the maximum permitted, including overtime, except in extraordinary circumstances. Workers are entitled to at least one rest day in every seven-day period.

Humane Treatment

Suppliers shall treat every worker with dignity and respect. There shall be no harsh or inhumane treatment, including any form of sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse, or threats of any such treatment.

4. Health and Safety

Suppliers shall provide workers with a safe and healthy working environment and, where applicable, safe and healthy on-site housing, in order to prevent workplace accidents, injuries, and illness.

- Identify, assess, and control worker exposure to physical, chemical, and biological hazards.

- Provide appropriate personal protective equipment at no cost to workers.
- Maintain emergency preparedness plans, including clearly marked evacuation routes, fire suppression equipment, and regular emergency drills.
- Implement occupational injury and illness prevention programs, including reporting and investigation procedures.
- Ensure machine guarding, electrical, fire, and other workplace safety hazards are properly controlled.
- Provide access to clean toilet facilities, potable water, and sanitary food preparation and storage facilities.

5. Environmental Responsibility

Suppliers shall operate in an environmentally responsible manner, minimizing adverse impacts on the environment and conserving natural resources.

- Obtain and maintain all required environmental permits and approvals, and comply with their operational and reporting requirements.
- Minimize waste generation and pursue reduction, reuse, and recycling of materials wherever practicable.
- Properly identify, handle, store, and dispose of hazardous substances and waste.
- Manage air emissions and wastewater discharges in accordance with applicable permits and limits.
- Take measures to improve efficient use of resources, including energy and water, and to reduce greenhouse gas emissions.
- Avoid the use of conflict minerals sourced from areas where their extraction or trade contributes to human rights abuses, and exercise due diligence on mineral supply chains consistent with the OECD Due Diligence Guidance.

6. Business Ethics

Anti-Corruption and Anti-Bribery

Suppliers shall not engage in any form of bribery, corruption, extortion, or embezzlement, and shall not offer, promise, give, or accept any improper payment or benefit to or from any party, including government officials, to obtain or retain business or secure any improper advantage.

Conflicts of Interest

Suppliers shall avoid any activity that creates, or appears to create, a conflict between the personal interests of an individual and the interests of the Company, and shall promptly disclose any actual or potential conflicts of interest to the Company.

Gifts and Entertainment

Suppliers shall not offer gifts, entertainment, or other benefits to Company employees that could improperly influence, or appear to influence, a business decision.

Fair Business, Advertising, and Competition

Suppliers shall uphold fair business practices, including fair competition, advertising, and antitrust standards. Suppliers shall maintain accurate records and shall not engage in fraud or misrepresentation of products, services, or business practices.

Protection of Confidential Information and Intellectual Property

Suppliers shall safeguard confidential information belonging to the Company, its customers, and other third parties, and shall respect the intellectual property rights of others. Confidential information shall be used only for the purposes for which it was disclosed.

Anti-Money Laundering and Trade Sanctions

Suppliers shall comply with applicable anti-money laundering laws and international trade sanctions, and shall not knowingly conduct business with individuals or entities that are subject to applicable sanctions or trade restrictions.

7. Management Systems

Suppliers are encouraged to adopt or establish management systems designed to ensure ongoing compliance with this Code and applicable legal requirements, and to facilitate continual improvement. Such systems should include, as appropriate:

- A written company commitment to the principles set out in this Code, endorsed by senior management.
- Clear accountability for compliance with the Code, including designated management representatives.
- Legal and regulatory compliance tracking relevant to the Supplier's operations.
- Risk assessment and prioritization procedures for the labor, health and safety, environmental, and ethics risks associated with the Supplier's operations.

- Training programs to ensure managers and workers understand applicable policies, procedures, and this Code.
- Channels for workers to raise concerns or report violations without fear of retaliation.
- Processes for audits, self-assessments, and corrective action to address identified deficiencies.
- Documentation and records sufficient to demonstrate compliance with this Code and applicable law.

8. Monitoring, Reporting, and Enforcement

Right to Audit

The Company reserves the right to assess Supplier compliance with this Code through self-assessment questionnaires, scheduled or unannounced on-site audits, and reviews of records and documentation, conducted directly or through a third party. Upon request of Company, Suppliers will be required to submit an annual RBA (Responsible Business Alliance) SAQ (Self-Assessment Questionnaire) and certain Suppliers will be required to complete an onsite RBA audit. Suppliers shall provide reasonable access to facilities, records, and personnel to support such assessments.

Reporting Concerns

Suppliers, and their workers, are encouraged to report suspected violations of this Code, applicable law, or Company policy through the Supplier's own internal channels or directly to the Company via [ethics hotline / email address / reporting portal]. Reports may be made confidentially and, where permitted by law, anonymously. The Company prohibits retaliation against anyone who reports a concern in good faith.

Corrective Action

Where an audit or investigation identifies non-conformance with this Code, the Supplier will be expected to develop and implement a corrective action plan within a timeframe agreed with the Company. The Company may provide guidance and reasonable time to remediate findings, taking into account the severity and nature of the issue.

Consequences of Non-Compliance

Failure to comply with this Code, or failure to implement agreed corrective actions, may result in consequences up to and including suspension of purchase orders, termination of the business relationship, and, where warranted, referral to relevant authorities. The Company reserves sole discretion in determining appropriate consequences based on the severity, frequency, and circumstances of any non-compliance.

9. Referenced Legislation and Standards

This Code is informed by, and intended to support Supplier alignment with, the international frameworks and national/regional legislation listed below. This list is illustrative and non-exhaustive; Suppliers remain responsible for identifying and complying with all laws applicable to their own operations. The Company reviews this list periodically as legislation evolves.

International Frameworks and Standards

- ILO Declaration on Fundamental Principles and Rights at Work, and core ILO Conventions (No. 29 and 105 – Forced Labour; No. 138 and 182 – Minimum Age and Worst Forms of Child Labour; No. 87 and 98 – Freedom of Association and Collective Bargaining; No. 100 and 111 – Equal Remuneration and Non-Discrimination).
- United Nations Guiding Principles on Business and Human Rights (UNGPs).
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the OECD Due Diligence Guidance for Responsible Business Conduct.
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- United Nations Global Compact – Ten Principles.
- United Nations Convention on the Rights of the Child.
- Responsible Business Alliance (RBA) Code of Conduct.
- ISO 45001 (Occupational Health and Safety), ISO 14001 (Environmental Management), and ISO 37001 (Anti-Bribery Management Systems).
- GHG Protocol Corporate Accounting and Reporting Standard.

Anti-Corruption and Trade

- United Nations Convention against Corruption (UNCAC).
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.
- U.S. Foreign Corrupt Practices Act (FCPA), 15 U.S.C. §§ 78dd-1, et seq.
- UK Bribery Act 2010.
- Applicable trade sanctions and export control regimes, including those administered by the U.S. Treasury Office of Foreign Assets Control (OFAC), the UK Office of Financial Sanctions Implementation (OFSI), and the European Union.

Labor, Human Rights, and Supply Chain Transparency Legislation

- UK Modern Slavery Act 2015.

- Australia Modern Slavery Act 2018 (Cth).
- California Transparency in Supply Chains Act (SB 657).
- U.S. Uyghur Forced Labor Prevention Act (UFLPA), 2021, and Section 307 of the U.S. Tariff Act of 1930 (forced labor import prohibition).
- Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2023.
- Germany Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG).
- France Corporate Duty of Vigilance Law (Loi de Vigilance).
- Norway Transparency Act (Åpenhetsloven).
- EU Forced Labour Regulation (Regulation (EU) 2024/3015), prohibiting products made with forced labour from the EU market, applicable from 14 December 2027.
- EU Corporate Sustainability Due Diligence Directive (Directive (EU) 2024/1760), as amended by the Omnibus I Directive (EU) 2026/470; Member State transposition due by 26 July 2028, with application from 26 July 2029 for in-scope companies.

Environmental and Product-Specific Regulation

- EU Deforestation Regulation (Regulation (EU) 2023/1115).
- EU Conflict Minerals Regulation (Regulation (EU) 2017/821) on due diligence obligations for importers of tin, tantalum, tungsten, and gold.
- EU Battery Regulation (Regulation (EU) 2023/1542).
- EU Corporate Sustainability Reporting Directive (Directive (EU) 2022/2464), as amended by the Omnibus I package.
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.
- Montreal Protocol on Substances that Deplete the Ozone Layer.
- Paris Agreement under the United Nations Framework Convention on Climate Change.

Note: Several of the legislative frameworks above (notably the EU Corporate Sustainability Due Diligence Directive and the EU Forced Labour Regulation) have been subject to recent amendment and phased application dates. Suppliers should consult official government or EU sources, or seek independent legal advice, to confirm current requirements applicable to their operations, as this area of law continues to develop.

10. Supplier Acknowledgement

By signing below, the Supplier confirms that it has read, understood, and agrees to comply with this Supplier Code of Conduct, and to take reasonable steps to ensure that its own subcontractors and suppliers observe equivalent standards.

Company Name:	**Printed Name / Title:**
Authorized Signature:	**Date:**