

SUPPLIER CODE OF CONDUCT**Supplier Social Practices**

We Spaas understand human rights to include the following. Any violation of these values will NOT be accepted.

SPAAS is committed to ensuring that our suppliers' employees are treated well by ensuring they have appropriate working conditions for their employees, that they focus on employee career management, encourage diversity and inclusion, reduce discrimination and harassment, properly manage the health and safety of their employees or subcontractors and do not engage in illegal child or forced labour.

a) Labour and Human RightsForced labour

Ensure employment of all employees on their own free will.

[Workers are free to leave their employer after reasonable notice]

Child labour

ZERO TOLERANCE on employment of children who are under the minimum working age in each country/region. ZERO TOLERANCE on human trafficking.

Conform ILO standards, [no child or Young Person under 18 shall be employed at night or in hazardous conditions.

Harassment and discrimination

Prohibit abuse and various acts of harassment, and clearly define and communicate disciplinary policies and procedures for dealing with these incidents. Ensure that there is no discrimination in recruitment, physical exams, employment, retirement, access to training or compensation based on race, national origin, religion, age, gender, marital status, sexual orientation or political affiliation, and that the treatment in the workplace is fair.

Appropriate wages

Ensure payment of at least minimum wage for employees as stipulated by the laws of each country/region or industry benchmark standards, whichever is higher.

All employees shall be provided with written and understandable Information about their employment conditions before they enter employment and about the details for their wages for each time they are paid. Deduction from wages as a disciplinary measure or unsupported by national law and without the expressed permission of the worker concerned, shall not be permitted. All use of temporary, dispatch and outsourced labour will be within the limits of the local law.

Working hours

Ensure working hours per week, including overtime hours, do not exceed the limits set by the laws of each country/region. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations¹. All overtime must be voluntary and shall not exceed 12 hours a week. Workers shall be allowed at least one day off every seven days.

Freedom of association and the right to collective bargaining are respected

Worker without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

The employer adopts an open attitude towards the activities of trade union and their organisational activities.

Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

b) Health and safety

demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies;

¹ Working hours may exceed 60 hours a week if: a) This is allowed by a CA freely negotiated with a representatives of a sign. proportion of the workforce; b) safeguards are taken to protect the workers' health and safety; and c) The employer can

Health and safety in the workplace

Ensure safety measures are taken for each type of mechanical equipment that is used, e.g. by implementing Life Saving Rules. Evaluate the risk of and exposure to chemicals used in the workplace and take appropriate measures to ensure the safety of workers. Establishment of management standards, workers' education, and providing personal protective equipment, in order to prevent chemical and physical exposure that is harmful to the human body. Provide an appropriate working environment (lighting, temperature control, ventilation, etc.).

Emergency response

Evaluate and identify potential disasters and accidents to protect the lives and physical safety of employees, etc., and deploy emergency response measures to the workplace through training and education. Secure emergency evacuation routes (emergency exits, etc.) based on the laws of each country/region.

Supplier environmental practices

SPAAS recognizes that environmental awareness is essential for the production of SPAAS-level products and expects suppliers to act accordingly.

c)Environment

Environmental permits and reporting

All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

Implementation of environmental management system

Establish a representative environmental management system such as ISO 14001 and operate the system to ensure continuous improvement.

Reduction of energy consumption and greenhouse gas emissions

Suppliers must track their energy consumption and all relevant greenhouse gas emissions from scopes 1, 2 and 3. They must also set targets to reduce GHG and define methods to achieve them.

Ensure payment of overtime allowances as a premium on regular hourly rate in accordance with the laws of each country/region.

Labour accidents and occupational illnesses

Take necessary corrective measures in case of a labour accident or occupational illness. Identify work that places a burden on the body, such as handling heavy objects or prolonged standing work, and ensure appropriate management, such as providing regular breaks, providing work aids, and sharing work among multiple workers.

Employee Health Management

Conduct health examinations, etc. for disease prevention and early detection based on the laws of each country/region.

Restricted substances list

SPAAS requires commitment from its suppliers to not use hazardous chemicals for SPAAS products.

Chemical Management of chemicals

Identify, use, handle and store hazardous chemicals according to the laws of each country/region. Communicate about chemical compositions of products, as required by the law of a country/region. Limit the presence of hazardous chemicals in products where possible.

Waste Management

Ensure waste is handled - disposed, recycled, etc. - according to the laws of each country/region. Ensure efforts are made to reduce the amount of waste such as modifying equipment and promoting recycling.

Prevention of water & air pollution

Ensure that efforts are made to minimize, analyse and monitor wastewater discharge, air pollutants and allow their pollution only after appropriate management and treatment measures have been

taken in accordance with the laws of each country/region.

Responsible procurement of minerals

Avoid the use of conflict minerals as raw materials of products that would provide a source of funding to armed groups.

Raw material sourcing, biodiversity

Suppliers should be transparent about their raw material sourcing practices, including providing information about the origin and composition of their materials and any associated risks or impacts. Suppliers should continuously monitor and improve their raw material sourcing practices, seeking out more sustainable and responsible alternatives where possible.

We expect our suppliers to avoid any form of land, water, forest and mineral degradation. We expect our suppliers to avoid deforestation and land conversion for agriculture. This includes avoiding development in areas of high conservation value (HCV) and high carbon stock (HCS). Companies are expected to respect the rights of local communities and workers who must receive fair and transparent benefit sharing.

d) Fair trade and ethics

Fair corporate activities

Create, publish and implement business conduct guidelines. Ensure fair, transparent, and free competition. Refrain from engaging in collusion with any business partner, exchanging money or gifts, or conducting excessive entertainment that may be of concern. Maintain healthy and normal relations with policymakers and administrative bodies; do not engage in bribery, illegal political contributions, etc. Create and implement a policy that prohibits improper advantage by giving or accepting any forms of bribery, extortion, embezzlement.

Privacy

Participants shall comply with privacy and information security laws and regulations when personal information is collected, stored, processed, transmitted and shared.

Provision and disclosure of accurate information

Conduct transactions with transparency and appropriately disclose accurate information for products, services, etc. according to the laws of each country/region. Provide and disclose information regarding products, services, business activities, financial status, business performance, risk, etc. to stakeholders in a timely and appropriate manner.

Anti-bribery

Spaas does not tolerate bribery or any attempted bribery of staff, second/third party representatives. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

Respect for intellectual property

Do not infringe on the intellectual property rights of others. Customer and supplier information is to be safeguarded.

Construction of a system to detect and prevent misconduct

Establish a whistleblowing process to receive problems and consultations from clients and employees, etc. Ensure protection of identify, confidentiality and non-retaliation for the whistleblower. Ensure education and awareness activities on ethics issues for employees.