



SUPPLIER CODE OF CONDUCT

and basic working conditions

KINETROL LTD

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Introduction and General Requirements

Introduction

The purpose of this Code of Conduct and Basic Working Conditions (hereinafter referred to as "CofC") is to ensure that all Kinetrol Ltd products and services are developed and manufactured in a responsible way. We aim to establish long lasting relationships with our suppliers to our mutual benefit.

General Requirements

All suppliers must, as a minimum, comply with local laws and regulations in their countries of operation. Should any specific provisions of the CofC legally conflict with national or local laws, the applicable laws should always prevail; in those circumstances, Kinetrol Ltd should be informed in writing.

By accepting and processing orders from Kinetrol Ltd, you are agreeing to abide by this CofC and subsequent updates, the latest edition being available at www.kinetrol.com/suppliers .

It is the responsibility of the supplier to contact Kinetrol and raise any concerns regarding their ability to comply with the requirements of this document.

Elements of this document's requirements will be audited as part of our scheduled auditing policy

Information and Data Confidentiality

All suppliers must keep proprietary information and data in strict confidence, except when authorized to or legally required to disclose it. Suppliers must keep customer, employee and other data protected and in accordance with local and international law. Unlawful use or disclosure of trade secrets is prohibited and can result in civil or criminal actions. The absence of an NDA (Non-Disclosure Agreement) does not exempt the supplier from this requirement.

Privacy

Kinetrol Ltd expects all suppliers to comply with the EU GDPR (General Data Protection Regulation) as well as local Data Protection Laws.

Human Rights and Working Conditions

Human Rights

We expect Kinetrol Ltd suppliers to comply with basic human rights as defined by the International Bill of Human Rights and the core labour rights set out by the International Labour Organisation as reflected in the Declaration on the Fundamental Principles and Rights at Work. We expect our suppliers to share and commit to these standards.

Equal Opportunities and Discrimination

We expect our suppliers to provide a workplace that is free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or civil status in hiring and employment practices.

Child labour, forced labour, human trafficking and modern slavery

Kinetrol Ltd will not conduct business with suppliers that are associated with child labour, forced labour or any form of human trafficking. This includes work on a forced contract, slavery and other forms of work which are done against a workers will, choice or under coercion. Kinetrol Ltd believes that all children have a right to a childhood and an education. Suppliers must ensure that no person is employed at an age younger than 16 years unless completing a work-based educational course or apprenticeship.

Freedom of Association and Collective Bargaining

The supplier must respect its employees' right to organise themselves and negotiate collective wage agreements. If independent trade unions are either obstructed or restricted, the supplier shall enable workers to gather independently to discuss work related issues (in compliance with local laws and regulations).

Employment Practices

Suppliers shall not threaten workers or subject them to harsh or inhumane treatment, including but not limited to sexual abuse, sexual harassment, corporal

punishment, mental coercion, physical coercion, extreme verbal abuse, or unreasonable restrictions on entering or exiting company provided facilities.

Work must not be performed against the employees will and the employee shall be free to leave or terminate their employment with reasonable notice. Workers must not be required to surrender any government issued identification, passports, or work permits as a condition of employment.

Suppliers shall ensure that contracts for direct and contract workers clearly convey the conditions of employment in a language understood by the worker and any changes have to be clearly communicated.

Health and Safety

Suppliers must provide a healthy and safe working environment for all employees.

- We require suppliers to follow all applicable local laws and regulations pertaining to Health and Safety in the workplace.
- We expect suppliers to protect employees from work-related hazards and work to continuously reduce workplace-related hazards, accidents and injuries
- We expect suppliers to have a documented Health and Safety Management system, defining management responsibilities, assessing and mitigating risks, setting appropriate targets and conducting training.

Right to Privacy

We expect suppliers to respect their employees right to privacy when gathering or keeping personal information or implementing employee-monitoring practices.

Environment

Climate and Environment

We expect Kinetrol Suppliers to carry out operations with care to the environment and strive to minimise adverse impacts.

All suppliers must comply with local and international (for products moving across borders) environmental law. This includes but is not limited to compliance to REACH (Registration, Evaluation and Authorisation of Chemicals) and RoHS (Restriction of Hazardous Substances) directives where appropriate.

All suppliers must have a written policy or statement that is appropriate for the size and type of operation, for the parent group (where applicable) and local operations.

A circular economy principle should be considered when designing, developing and manufacturing products and services

We encourage our suppliers to consider:

- Reduction of greenhouse gas (GHG) emissions through decarbonisation initiatives
- Responsibly manage water use – both quality and quantity
- Improve energy and resource efficiency
- Initiatives for the reduction of waste, particularly landfill

Pollution

The clean Air Act aims to reduce outdoor, ambient concentrations of air pollutants which cause smog, haze, acid rain and other related health problems for humans and wildlife. Suppliers are encouraged to be familiar with these requirements and actively take steps to mitigate negative impacts from their operations.

Product Safety and Material Compliance

- Suppliers shall ensure that all goods and materials supplied to Kinetrol comply with applicable laws in the country of origin, transit countries, territories, and Kinetrol delivered location.

Anti-Corruption, Sanctions and Business Integrity

- Where the product or material may contain SVHCs (Substances of Very High Concern) as defined in Annex 14 of REACH, the supplier will notify Kinetrol in writing, detailing the use and concentration. SVHCs, are substances identified under the EU (UK) REACH regulation that pose significant risks to human health or the environment. These substances are prioritized for further action, potentially leading to restrictions or outright bans on their use.

Conflict Minerals

Conflict minerals, as defined by the Dodd-Frank Act and the EU directive on conflict minerals refer to 3Ts and G (Tin, Tungsten, Tantalum and Gold) plus Cobalt and Diamond which are sourced from designated conflict regions.

We expect our suppliers to ensure that any of these materials contained in products supplied to Kinetrol are not sourced from designated conflict zones and must meet international responsible sourcing standards set by the OECD (Organisation for Economic Co-Operation and Development).

Sanctions and Embargoes

Kinetrol Ltd expects that all suppliers comply with the applicable export control and customs regulations as well as national and international sanctions against designated countries, entities and persons.

Any instances of the supplier, its banks, shareholders, affiliates, directors, officers or employees appearing on an individual, organisational or country sanction or embargo list MUST be declared to Kinetrol. We reserve the discretionary right to take appropriate action and investigation prior to entering any business transaction for future or current contracts.

Conflict of Interest and Improper advantage

Suppliers shall not offer or solicit inappropriate gifts, gratuities or entertainment which could influence or appear to influence a business decision or be used to gain competitive advantage. Payments of cash, loans or any credit devices are prohibited. Small, low value gifts or merchandising are commonly exchanged as part of a business relationship and these are acceptable but should not be of a substantive value such that they may influence a business decision.

We require our suppliers to comply with all applicable National and International competition and antitrust legislation.

Brands and Trademarks

We expect our suppliers to conduct themselves at all times in ways which reinforce and strengthen the Kinetrol trademarks and brands. Suppliers use of the Kinetrol trademark and other registered or unregistered trademarks or brands of Kinetrol or its affiliated companies is not permitted without the express written permission of officers of Kinetrol.

Timely, Accurate and Complete business Records

Suppliers are required to maintain reasonable, complete and accurate records of and be able to produce in a timely fashion, transactions with Kinetrol.

Suppliers must create, retain and dispose of business records in full accordance with applicable legal and contractual requirements. Kinetrol reserves the right to monitor and evaluate Supplier documents, data and records at our discretion as they pertain to work or services being performed for Kinetrol.

Sub-Suppliers

Kinetrol Ltd expects our suppliers to communicate and use this Code of Conduct actively in co-operation with their own suppliers for products and services delivered to Kinetrol Ltd. and to ensure compliance to the Kinetrol Code of Conduct in their supply chain so far as is practicably possible.