

Third Party Code of Conduct

ecobat

Introduction

Corporate integrity, responsible procurement, ethical business partners, social and environmental responsibility, as well as the safety and well-being of stakeholders across the global value chain are of paramount importance to Ecobat. These principles apply to all aspects of Ecobat's business and encompass all manufacturers, distributors, vendors, and suppliers (each a "Third Party" and collectively "Third Parties") that conduct business with Ecobat.

The principles reflected in this Third Party Code of Conduct ("Third Party Code of Conduct"), establish the minimum standards that must be met by any Third Party that provides services, sells goods to, or does business with Ecobat. In order to facilitate third party compliance with Ecobat's standards, and Ecobat's obligations to its own customers and vendors, we use Exiger, a tool to manage third party risk and compliance. Your completion of Exiger-facilitated questionnaires is appreciated and required.

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Applicability

The Third Party Code of Conduct applies to Third Parties who provide services and/or goods to Ecobat. Third Party is responsible for compliance with the minimum standards set out in Ecobat's Third Party Code of Conduct ("Standards") throughout its operations and throughout its entire supply chain. Without limiting Third Party's obligations hereunder, Third Party shall comply with the Standards in:

- All of its Facilities; and
- All of its operations, including with respect to manufacturing, distribution, packaging, sales, marketing, product safety and certification, intellectual property, labor, immigration, health, worker safety, and the environment.

Without limiting Third Party's obligations hereunder, Third Party is responsible for compliance with the Standards by all of its suppliers, vendors, agents, and subcontractors and their respective Facilities ("Partner(s)").

Social Commitments

RESPECT FOR HUMAN RIGHTS

Ecobat is committed to upholding all internationally recognized human rights¹ across all aspects of its operations and value chain. In line with this commitment, all Third Parties shall ensure that all people are treated fairly, with dignity and respect as per these human rights principles, and implement practices aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidelines on Responsible Business Conduct for Multinational Enterprises.

DISCRIMINATION AND HARASSMENT

Ecobat values diversity in all forms, including diversity of thought, life experience, worldview, race, gender, and orientation. Third Party shall not, and shall ensure that its Partners do not, support or engage in any illegal discrimination. There will be no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, disability, veteran status, age, gender, marital status, sexual orientation, union membership, or political affiliation. Third Party shall further ensure that all its Facilities and that of its Partners are free from harassment, physical and verbal abuse, or intimidation of any kind.

¹As outlined in the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization (ILO).

FREEDOM OF EMPLOYMENT

All labor must be voluntary. Third Party must respect employees' freedom to choose an occupation and right to engage in work, and must not use any form of forced, bonded, or involuntary labor, and must not condone or permit any of its Partners to condone any practices that can give rise to a risk of involuntary labor. In support of the above, Third Party must ensure that:

- Persons seeking employment are not required to provide monetary deposits or identity papers to secure work and are free to leave Ecobat's employment after reasonable notice in accordance with applicable labor laws and/or international best labor practices;
- No person is held in slavery or servitude;
- There will be no human trafficking for the purpose of exploitation, which includes securing services by force, threat, or deception, or securing services from children or vulnerable persons.
- There will be no child labor: no one should be employed who is below the legal minimum age for employment.

In line with Ecobat's Modern Slavery Statement, which constitutes the anti-slavery and human trafficking statement for Ecobat and its global subsidiaries, Third Party further agrees to comply with and conduct its operations in line with the provisions of Chapter 30, Part 6, Section 54 of the UK Modern Slavery Act, 2015.

In this regard Third Party shall:

- Implement and maintain a reliable system to verify the eligibility of all employees, including:
 - Age eligibility; and
 - Legal status of foreign employees.
- Implement and maintain a reliable recordkeeping system regarding the eligibility of all workers.

HAZARDOUS WORK

Without limiting Third Party's obligations hereunder, Third Party shall not, and shall ensure that its Partners do not, support or engage in, or require any hazardous labor to be performed by any person under the age of 18. Hazardous labor involves any work, that by its nature or the circumstances in which the work is undertaken, involves the substantial risk of harm to the safety or health of the employee or coemployees, if adequate protections are not taken. Third Party shall ensure safe and healthy working conditions for all employees: this includes making sure that adequate facilities, training and access to safety information are provided. All applicable policies, procedures and guidelines must be adhered to.

IDENTIFICATION PAPERS

Without limiting Third Party's obligations hereunder, Third Party shall not require any worker to surrender control over the original:

- Identification papers or documents giving a foreign employee the right to work in the country;
- Identification papers or documents, such as a passport, giving a foreign worker the right to enter or leave the country; or
- Documents, such as a birth certificate, evidencing the person's age.

FINANCIAL OBLIGATIONS

Without limiting Third Party's obligations hereunder, Third Party shall not, whether or not as a condition to the right to work, require any employee (or employee's spouse or family member) to, directly or indirectly:

- Pay recruitment or other fees or other amounts (monetary or in-kind);
- Incur debt.
- Make financial guarantees; or
- Incur any other financial obligation.

FREEDOM OF MOVEMENT

Without limiting Third Party's obligations hereunder, Third Party shall ensure that employees have the right to freedom of movement without:

- Delay or hindrance; or
- The threat or imposition of any discipline, penalty, retaliation, or fine, or other monetary obligation.

Employees' freedom of movement rights includes each person's right to leave the Facilities without retaliation:

- At the end of each scheduled workday;
- Based on reasonable health and safety-related justifications.

FREEDOM TO TERMINATE EMPLOYMENT

Without limiting Third Party's obligations hereunder, Third Party shall allow employees to terminate their employment or work arrangement:

- Without restriction; and
- Without the threat or imposition of any discipline, penalty, retaliation, or fine, or other monetary obligation.

COMPENSATION AND BENEFITS

Third Party must compensate all workers with wages, including overtime premiums, and benefits that at a minimum meet the higher of:

- The minimum wage and benefits established by applicable law;
- Applicable collectively bargained agreements; and
- An amount sufficient to cover basic living requirements.

Third Party shall make wage payments during, at a minimum, the legally required intervals, and provide benefits on a timely basis.

Third Party's obligation to compensate and provide benefits applies to all workers at all times, including during periods of training, apprenticeship, and probation.

In this regard, Third Party shall:

- Upon request, provide proof of payment to workers in the workers' native language showing hours worked, wage amounts and rates (regular, overtime, and bonus), and deductions;
- Provide proof of payment to workers in the location's prevailing language showing hours worked, wage amounts and rates (regular, overtime, and bonus), and deductions;
- Ensure that proof of payment is accurate, is clearly calculated, and enables workers to quickly verify the amount of payment and method of calculation; and
- Maintain proper documentation of wage payments for their internal records.

DEDUCTIONS

Third Party shall not make any deductions from wages, except income tax withholding and those that are legally allowed.

WORK HOURS

Third Party must ensure that working hours are regulated as prescribed by law. Where provisions regarding working hours are not provided for in law, working hours will be prescribed according to international best labor practices to ensure the protection of employees' rights.

In this regard, Third Party shall:

- Not require or allow workers to work more than the maximum legally permitted number of regularly paid hours worked per week
- Ensure that overtime hours are voluntary, and do not exceed the maximum legally permitted number of overtime hours worked per week.
- Ensure that employees are allowed to take reasonable lunch, rest and bathroom breaks;

In addition, Third Party is required to:

- Use an industry-accepted time-keeping system to track worker work hours; and
- Develop work-hour policies to ensure compliance with this Third Party Code of Conduct and applicable law.

HEALTH AND SAFETY

To ensure the health and safety of employees and persons other than employees that may be affected by Third Parties' operations, Third Party must develop and implement a health & safety program that is aligned to ISO 45001 and that focuses on risk management to prevent industry-specific workplace hazards that are not specifically addressed in these Standards. In addition, the Third Party shall ensure that health and safety systems incorporate strategies for protecting mental health and well-being of workers.

The health and safety system shall include but not be limited to the following aspects:

- Incident investigation methodology: tracking and reporting of incidents;
- Hazards identification and assessments associated with risk mitigation efforts, for both physical and mental health aspects;
- Health and Safety Inspections;
- Employee-specific training requirements associated with work-related risks;
- Communication around hazards, including no-barrier access to Safety Data Sheets (SDS) for chemical handling and exposures;
- Focus on process-specific risks and exposures to employee physical and mental health, including well-being;
- Site-specific requirements for identified health and safety risks to employees;
- Emergency preparedness, fire prevention, and maintenance;
- Maintenance of facilities, plant equipment, and utilities;
- Emergency response, business continuity, and crisis communication;
- Recordkeeping of all health and safety-related documentation;
- Providing (free of charge) personal protective equipment (PPE) that shall be appropriate and provide adequate protection for the employees against hazards associated with the environment and work conducted by the employee;
- Third Party shall ensure that it provides a safe and hygienic work environment that as a minimum meet all applicable building codes and industry design and construction standards;
- Traceable and recordable training program on health and safety in the workplace, which includes contractors and visitors.

FACILITIES

Third Party shall ensure that it provides a safe and hygienic work environment that as a minimum meet all applicable building codes and industry design and construction standards. The Facilities provided by Third Party shall include but not be limited to the following:

- Obtain and comply with all construction approvals required by law;
- Obtain and comply with all zoning and use permits required by law;
- Develop and maintain an adequate evacuation plan, conduct regular evacuation drills and keep a record thereof;
- Have an adequate fire safety, prevention, alarm, and suppression systems;
- Have adequate, well-lit (including emergency lighting), clearly marked, and unobstructed emergency exit routes, including exit doors, aisles, and [fire-rated enclosed] stairwells, accompanied by visible and accurate evacuation maps posted in the local language, indicating “you are here” included on such evacuation maps;
- Have a sufficient number of emergency exit doors, which are located on all sides of each building, are unlocked (from the inside), and are readily opened [with a push bar with minimal force and] from the occupied side and swing in the direction of emergency travel;
- Have adequate ventilation air circulation and lighting;
- Have and maintain appropriate first aid kits and stations;
- Provide adequate access to potable water and access to private toilet facilities;
- Post safety rules, inspection results, incident reports, and permits, in each case, if required by law;
- Obtain and maintain relevant permits and certificates required by law in respect of fire preparedness and/or the storing of dangerous goods.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Third Party shall respect, and shall not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining. They shall establish appropriate and effective social dialogue with employees and their representatives.

Without limiting Third Party’s obligations set out above, Third Party shall not:

- Take any action to prevent or suppress the employees’ exercise of freedom of association or collective bargaining rights;
- Discriminate or retaliate against, or discipline or punish, any worker who supports or exercises freedom of association or collective bargaining rights;

- Discriminate or retaliate against, or discipline or punish, any employee who raises collective bargaining compliance issues; or
- Discriminate or retaliate against, or discipline or punish, any worker based on union membership or the employee’s decision to join or not join a union.

PRIVACY

Third Party shall respect the right to privacy of all individuals, ensuring personal spaces are safeguarded in accordance with applicable laws and ethical standards. This includes preventing unwarranted intrusion into the personal lives of employees and local communities.

RIGHTS OF LOCAL COMMUNITIES

Third Party shall respect the rights of local communities, engaging with them in a responsible and transparent manner in all business operations. Furthermore, Third Party must ensure no illegal eviction or deprivation of land rights, protecting against any mistreatment by private or public security forces, and guaranteeing freedom of expression and access to information to uphold fairness and transparency, especially in dealings related to land and resources.

Environmental Protection

OPERATION OF THIRD PARTY’S FACILITIES

Third Party shall operate its Facilities in compliance with all relevant environmental laws, including local legislations and international treaties. This commitment extends beyond legal compliance to embracing what is reasonable in terms of the best international practices in environmental stewardship. The scope of these practices includes, but is not limited to:

- **Waste management and disposal:** Implementing strategies to minimize waste production and enhance recycling and reuse in alignment with circular economy principles.
- **Pollution prevention:** Taking measures to prevent or mitigate pollution of air, soil and water. This includes implementing rigorous control of emissions as well as minimizing noise and light pollution where applicable.
- **Greenhouse gas emissions and energy use:** Actively working towards reducing greenhouse gas emissions through energy conservation measures. The development of climate mitigation and adaptation strategies is highly encouraged, including reporting on carbon footprint to demonstrate progress. Where possible, the third party should calculate annual organization carbon footprint covering scopes 1, 2 & 3 using the Greenhouse Gas Protocol method.

- **Management of water resources and effluent discharges:** Employing practices that prevent pollution and conserve water, particularly in water-scarce regions, to sustainably manage and protect water resources.
- **Protection of fauna and flora:** Committing to biodiversity protection and ecosystem conservation, including adherence to zero deforestation policies.
- **Use, storage and handling of hazardous and dangerous material:** Ensuring safe practices to prevent environmental contamination.

In this regard, Third Party shall:

- **Obtain and maintain all environmental approvals:** Secure and keep up-to-date all necessary environmental permits, licenses, and approvals as required by law.
- **Maintain a complaint record and follow-up actions register:** Keep a detailed record of environmental complaints and the actions taken to address them.
- **Implement traceable and recordable recordkeeping:** Establish a system for maintaining accessible and accurate records of environmental impact management and measurement.

Business Ethics

ANTI-CORRUPTION AND BRIBERY

Third Parties must strictly prohibit bribes in any form—whether cash, gifts, services, or other means of value—to influence business decisions or gain unfair advantage. This includes adhering to the anti-bribery and corruption laws of all jurisdictions in which they operate, and applying the principles laid out by the Organization for Economic Co-operation and Development (OECD) Anti-Bribery Convention and other international standards.

Furthermore, Third Parties are required to ensure that any compensation paid to brokers, agents, consultants, or others in relation to Ecobat’s business is transparent, justifiable as reasonable market rates for the services rendered, and executed in accordance with a written agreement specifying the terms of service and payment.

GIFTS AND ENTERTAINMENT

Gifts, entertainment, hospitality or other favors and personal benefits that could be used to influence, or be perceived as attempts to influence, decision-making or to secure an improper advantage are not accepted. Cash gifts are strictly prohibited.

ANTITRUST AND COMPETITION COMPLIANCE LAWS

Third Parties shall avoid any practices that could infringe upon antitrust and competition laws across all jurisdictions in which they operate. In this regard, the Third Party shall not:

- Form agreements, whether formal or informal, verbal or written, with competitors that could affect prices, pricing strategies, or allocate products, markets, territories, or customers;
- Exchange or acquire information with competitors regarding current or future prices, profit margins, costs, bids, market share, distribution practices, terms of sales, specific customers, or vendors;
- Participate in exclusionary practices, such as tying, bundling, loyalty rebates, or refusal to supply, especially when occupying a dominant market position.

INPUTS AND COMPONENTS

Third-Party must ensure that the goods it manufactures and/or supplies (including the inputs and components it incorporates into its goods) comply with all relevant environmental laws and treaties, including the packaging, storing, transporting, shipping, and disposing of such goods.

INFORMATION AND DATA SECURITY

Where a Third Party is in a position to access or process Ecobat data, we expect that appropriate technical and organizational controls are afforded to protect our data from unauthorized access or loss. This includes compliance with the General Data Protection Regulation (GDPR) for Third Parties operating within the EU, ensuring the protection of personal data against unauthorized processing and facilitating secure data retention and disposal practices. Third Parties must ensure data is retained only as long as necessary and disposed of securely to prevent any unauthorized access or use. It is especially critical when dealing with Ecobat’s confidential information that Third Parties respect Ecobat’s intellectual property, upholding the utmost standards of integrity and confidentiality.

RESPONSIBLE TAXATION

Third Party shall adhere to responsible taxation practices, strictly complying with all applicable tax laws and regulations to avoid tax evasion, prevent money laundering, and ensure ethical transfer pricing. This includes maintaining accurate financial records, conducting transactions at arm’s length, and implementing robust controls to verify the legality and transparency of all financial dealings.

COMPLIANCE

Third Party shall comply with all applicable international treaties, local laws, and regulations in respect of the services and/or goods supplied by it, including laws and regulations relating to all the Standards. Where this Third Party Code of Conduct requires Third Party to meet a higher standard than that set out by local laws or regulations, Third Party shall meet such higher standards. Additionally, the Third Party must designate responsibilities for adherence to ESG standards, and establish and maintain processes that support responsible business conduct, in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. This also includes enabling reporting of grievances and providing access to remedy. Furthermore, Third Parties are strongly encouraged to adopt equivalent or higher standards and to disseminate these expectations throughout their supply chain. This can be achieved by either sharing Ecobat's Third Party Code of Conduct directly with their suppliers or by developing and communicating a similar policy document of their own.

Third Party acknowledges that these Standards provide for audit standards that may be used by Ecobat to determine whether Third Party is meeting the Standards set out in this Third Party Code of Conduct. Third Party acknowledges Ecobat's discretion to reasonably utilize the above audit standards to conduct inspections of the Third Party's facilities to verify compliance with the Standards set out in this Third Party Code of Conduct, however, there shall be no obligation on Ecobat to conduct such inspections.

CONFLICT MINERALS

Third Parties are required to ensure that any substances defined as "conflict minerals" by governmental institutions used in their business do not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries, and are not sourced from Conflict-Affected and High-Risk Areas (CAHRAs)². Ecobat mandates that all relevant Third Parties demonstrate compliance with DRC conflict-free standards, including the implementation of internal due diligence measures for conflict-free sourcing. Moreover, Third Parties are expected to proactively manage and communicate these expectations throughout their supply chain to their direct suppliers, ensuring adherence to Ecobat's ethical sourcing standards. For more detail, [click here](#) for the Ecobat Conflict Minerals Compliance Policy Statement.

²CAHRAs are defined by the European Commission Directorate General for Trade, following criteria in Section 1502 of the of the Dodd-Frank Wall Street Reform and Consumer Protection Act, 2010.

Report Violations

Third Party shall ensure transparency and actively monitor adherence to the minimum requirements stipulated in this Third Party Code of Conduct, promptly self-reporting any violations or non-compliance. Third Party can also submit questions and/or comments regarding the Third Party Code of Conduct, to Ecobat's liaison as set out below:

REPORT ONLINE:

ecobat.ethicspoint.com

REPORT BY MOBILE DEVICE:

ecobatmobile.ethicspoint.com

CALL TOLL-FREE:

United States: 833-463-0585

Austria: Dial 0-800-200-288, then dial 833-463-0585

Belgium: Dial 0-800-100-10, then dial 833-463-0585

France: 0 800 99 08 41

Germany: 8001820566

Ireland: Dial 1-800-550-000 or 00-800-222-55288 (UIFN), then dial 833-463-0585

Italy: 800 897 505

Netherlands: Dial 0800-022-9111, then dial 833-463-0585

Spain: Dial 900-99-0011, then dial 833-463-0585

United Kingdom: 0800 077 3018

Third Party shall not retaliate, victimize, or take disciplinary action against any internal or external stakeholder who has, in good faith, reported to Ecobat any violations or questionable behavior regarding Third Party's operations, or who has sought advice regarding this Third Party Code of Conduct. Furthermore, the Third Party must guarantee that its stakeholders have the means to report violations by ensuring access to an effective grievance mechanism.

RESPONSIBLE DISENGAGEMENT

Ecobat prioritizes engagement with Third Parties to facilitate corrective action when minimum expectations, as detailed in this Third Party Code of Conduct, are not met. In instances where these standards are not upheld, Ecobat will first seek to work collaboratively with the Third Party to address and rectify the issue(s). Contract termination, including the cessation of all purchase orders and contracts, will be considered as a last resort. This may be initiated only if the Third Party or its Partners fail to amend their operations or conduct to align with the Standards set forth in this Third Party Code of Conduct.

To view the Exiger Privacy Notice, [click here](#).

