| BBH TSUCHIYA s.r.o.          |                    |     |  |  |
|------------------------------|--------------------|-----|--|--|
| d                            | Page:              | 1/5 |  |  |
| CODE OF ETHICS FOR SUPPLIERS | Revision:          | 0   |  |  |
| S 5.1.1.2                    | Edition:           | 1   |  |  |
|                              | Quantity of annex: | 0   |  |  |

# CODE OF ETHICS FOR SUPPLIERS

| Valid since : 01.13 |                  | 01.12.202  | 21          |
|---------------------|------------------|------------|-------------|
|                     | Name :           | Date :     | Signature : |
| Made by:            | Markéta Průšová  | 01.12.2021 | /Well_/     |
| Revised by:         | Lucie Matoušková | 01.12.2021 | 1.          |
| Approved by:        | Robin Novobílský | 01.12.2021 | My/         |

# CONTENT:

| 1.   | PROTECTION OF HUMAN RIGHTS                                       | 3   |
|------|--|-----|
| II.  | DISCRIMINATION PREVENTION  | 3   |
| III. | PROHIBITION OF CHILD LABOR                                       | .3  |
| IV.  | ENSURING FREEDOM OF ASSOCIATION AND COLLECTIVE NEGOTIATION       | . 3 |
| V.   | MEASURES AGAINST SLAVERY AND TRAFFICKING IN HUMAN BEINGS .3      | 3   |
| VI.  | PRINCIPLES OF INTERNAL COMMUNICATION                             | .3  |
| VII. | BUSINESS ETHICS  | .3  |
| VIII | . ENFORCEMENT IN THE FIELD OF THE ENVIRONMENT, HEALTH AND SAFETY | 5   |
| IX.  | PRODUCT COMPLIANCE WITH ENVIRONMENTAL REGULATIONS                | . 5 |
| Χ.   | CONFLICT MINERAL PROVISIONS (DODD-FRANK LAW REFORM, SEC1502)     | 5   |
| XI.  | DATA PROTECTION  |     |

BHH Tsuchiya s.r.o establishes a Code of Ethics, which sets out the rules of conduct for daily work, which must be observed by all its business partners and persons involved in business activities. BBH Tsuchiya s.r.o. ensures ethical business practices and these standards by establishing appropriate procedures and these procedures are applied to strengthen long-term and ongoing compliance with these ethical rules.

### I. Protection of human rights

BBH Tsuchiya s.r.o. supports the protection of internationally declared human rights, including minimum wages and working hours.

#### II. Discrimination prevention

BBH Tsuchiya s.r.o. declares equal opportunities and equal treatment to be one of the guiding principles of all its activities. It further prohibits any form of discrimination. No employee may be discriminated against on the basis of their age, marital status, gender, sexual orientation, nationality, ethics, medical condition, political, religious or personal beliefs.

Any overt or covert discrimination against, harassment, or humiliation of employees of any kind, based on these aspects, is completely unacceptable, must be reported immediately to a supervisor, and will be adequately punished by the company.

#### III. Prohibition of child labor

BBH Tsuchiya s.r.o. prohibits and abstains from any form of child labor within its organization.

# IV. Ensuring freedom of association and collective bargaining

BBH Tsuchiya s.r.o. respects the right of its business partners to freely associate, organize and bargain collectively in accordance with applicable national law.

#### V. Measures against slavery and human trafficking

BBH Tsuchiya s.r.o. takes measures to prevent modern-day slavery in our organization and our supply chain.

#### VI. Principles of communication

During daily joint work, communication takes place on a horizontal and vertical level. The company is interested in ensuring that each of its business partners always has at its disposal such a summary of information that is necessary for it to perform its tasks safely and with quality.

It is the right of every business partner to respond to any information they deem incomplete, inaccurate or submitted late.

BBH Tsuchiya s.r.o. maintains an "open door" policy and at the same time calls on all its business partners to use it.

If you have any questions, you can also contact: bbh@bbhcz.com

#### VII. Business ethics

The supplier BBH Tsuchiya s.r.o. undertakes to adhere to these principles, which apply to all business partners and persons involved in business activities.

- Prohibition of corruption, which is defined as the abuse of power for private gain.
- **Prohibition of violent enforcement** demanding bribes is an act of solicitation or incitement to another persons for bribery.
- **Prohibition of bribery** offering or accepting any gift, loan, bribe, reward or other benefit to or from any person as an incentive to do something dishonest, illegal or breach of trust in the course of business.
- The right to privacy is defined as "No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honor and reputation. Everyone has the right to judicial protection against such interference or attacks."
- **GDPR** the aim is to protect all EU citizens from invasion of privacy and abuse personal data with the ever-increasing current use of data.
- Financial responsibility is the responsibility of the company to accurately record, maintain and report business documentation, including, financial reports, reports to control bodies, if necessary. They are expected to be maintained in accordance with applicable laws and generally accepted accounting principles.
- **Disclosure of information** relates to the Company's responsibility to disclose financial and non-financial information in accordance with applicable regulations and general procedures.
- Fair competition and antitrust measures relate to encouraging businesses to comply with fair trade rules.

Compliance with competition rules is a fundamental responsibility of companies.

- A conflict of interest arises when an individual or legal entity (either private or public) is in a position to use its professional or official means for personal or corporate enrichment.
- Counterfeit parts: companies are expected to develop, implement and maintain methods and processes appropriate to their products and services to minimize the risk of use counterfeit parts and materials in the delivered goods.
- Intellectual property refers to goods created by human intellectual activity, such as inventions, designs, and commercially used symbols, names, and pictorial materials. It is protected by law, for example through patents, copyrights and trademarks, which allow individuals to gain recognition or financial reward for their inventions or creations.
- Export control measures and economic sanctions apply to restrictions on the export or re-export of goods, software, services and technology, and may also apply to certain trade restrictions involving certain countries, territories, enterprises or entities and individuals for exports to third and dangerous countries. .....

• Whistleblowing - Employees who selflessly and in good faith report a suspected violation of this Code cannot be penalized.

### VIII. Compliance with environmental, health and safety legislation

In BBH Tsuchiya s.r.o. we are in full compliance with the relevant national law on environmental protection, safety and health at work

We have an effective environmental policy in place and comply with all applicable national laws, regulations and standards that protect the environment. We also demand this attitude from our business partners.

#### IX. Product compliance with environmental regulations

BBH Tsuchiya s.r.o. provides products that fully comply with all applicable environmental compliance legislation. Such an approach is also expected of all business partners with whom we work together.

# X. Conflict Minerals Provisions (Dodd-Frank Law Reform, Sec1502)

BBH Tsuchiya s.r.o. ensures to customers worldwide and throughout our supply chain that all its products, which contain electronic components that use a certain amount of gold, tin, tantalum and tungsten, do not originate in the Democratic Republic of the Congo, Central Sudan, Zambia, Angola, Republic of the Congo, Tanzania, Burundi, Rwanda or Uganda, or any other neighboring countries or countries subject to embargoes by the US sanctions authorities, European authorities or any national authority.

Because we must collect proof of the origin of all four of these metals, even if they do not contain such a critical mineral, we require our suppliers to provide a report on the deliveries made to BBH Tsuchiya s.r.o. given the origin of these four metals.

#### XI. Data protection

The relationship with the customer is based on mutual trust and its preservation. All information about customers or business partners obtained in the course of business is subject to the obligation of confidentiality. Such information shall be treated as confidential. All inside information and data about customers and business partners must be protected by employees against unauthorized use, disclosure, alteration or destruction. This data may only be used for the purpose for which they were obtained. The protection of confidential data applies to all data carriers, regardless of their form.

|                                 | •••••• |
|---------------------------------|--------|
| Supplier (Name, position, date) |        |