ATTULLO

Suppliers Code of Conduct

1. INTRODUCTION

Sustainability is a key element to Attollo's Values and forms an integral part of our business strategy. Sustainable Development is an approach adopted by Attollo and sustainability is deemed to be a significant contributor to the company's success, future development and creating long-term value.

Attollo recognises the UN's Sustainable Development goals and seeks to align its operations to meet these universally accepted principles whether our suppliers are signatories or not.

Attollo expects all its suppliers and subcontractors to share the principles which are expressed in this Supplier Code of Conduct and comprise an important component of supplier selection, evaluation and business relationship with a supplier.

If a supplier by intention or negligence fails to live up to this Code or refuses to engage with due diligence activities or does not rectify issues identified, Attollo reserves the right to pursue terminations of the business relationship.

2. ETHICS

To meet social responsibilities, suppliers are expected to conduct their business in an ethical manner and to act with integrity.

Business Integrity/Anti-corruption

Suppliers are expected not to practice or tolerate any form of corruption, extortion or embezzlement. Suppliers will not offer or accept bribes or other unlawful incentives to/from their business partners. Suppliers are expected not to offer to Attollo employee's gifts or any kind of personal benefit resulting from the relationship with the suppliers.

Conflict of Interest

Attollo suppliers are expected to disclose any situation that may appear as a conflict of interest and disclose to Attollo if anyone at Attollo may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

Fair Competition

Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

Privacy & Intellectual Property

Property Suppliers will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

Identification of Concerns

Suppliers will provide means for their employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. Suppliers will investigate such reports and take corrective action if needed.

Conflict Minerals

Suppliers are expected to ensure that products supplied to Attollo do not contain metals derived from minerals or their derivatives originated from conflict

regions that directly or indirectly finance or benefit armed groups.

3. HUMAN RIGHTS INCLUDING LABOUR

Suppliers are expected to protect the human's rights of their employees and to treat them with dignity and respect.

Child Labour Avoidance

We do not tolerate child labour in our supply chain. Suppliers should avoid any sort of child labour in their business operations consistent with the ILO's (International Labour Organization) core labour standards and the United Nations Global Compact principles.

Community Relations

We expect suppliers to consult and engage with local communities to avoid causing or contributing to negative impacts on their human rights.

Freely Chosen Employment

Forced, bonded or indentured labour or involuntary prison labour will not be utilised by the suppliers.

Diversity and Inclusion

Equal treatment of all employees will be a fundamental principle of suppliers. Typical discriminatory treatment takes into consideration – consciously or unconsciously – irrelevant characteristics of an employee such as race, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law. Suppliers will ensure that their employees are not harassed in any way.

Fair Treatment

Suppliers will provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.

Working Hours, Wages and Benefits

Working hours for suppliers' employees will not exceed the maximum set by the applicable national law. Compensation paid to employees will comply with applicable national wage laws and ensure an adequate standard of living. Suppliers are expected to provide their employees with fair and competitive compensation and benefits. Compensation and benefits should aim at providing an adequate standard of living for employees and their families. Suppliers' employees will be paid in a timely manner.

Freedom of Association

Suppliers will be committed to an open and constructive dialogue with their employees and workers' representatives. In accordance with local laws, suppliers will respect the rights of their employees to associate freely, join labour unions, seek representation, join works councils and engage in collective bargaining. Suppliers will not disadvantage employees who act as workers' representatives.

4. HEALTH, SAFETY, ENVIRONMENT & QUALITY

Suppliers are expected to provide a safe and healthy working environment and, if applicable, safe and healthy company living quarters, and to operate in an environmentally responsible and efficient manner. Suppliers will integrate quality into their business processes.

Quality Requirements

Suppliers will meet generally recognised or contractually agreed quality requirements in order to provide goods and services that consistently meet Attollo's requirements, perform as warranted and are safe for their intended use.

Health, Safety, Environmental and Quality Regulations

Suppliers will comply with all applicable quality, health, safety and environmental regulations. All required permits, licenses and registrations will be obtained, maintained and kept up-to-date. Suppliers will fulfil their operational and reporting requirements.

Product Safety

Material safety data sheets containing all necessary safety-relevant information will be made available by suppliers for all hazardous substances.

Occupational Health and Safety

Suppliers will protect their employees from any chemical, biological and physical hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees. Suppliers will provide appropriate controls, safe work procedures, preventative maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace. When hazards cannot be adequately controlled by these means, suppliers will provide employees with appropriate personal protective equipment. Safety information relating to hazardous materials – including compounds in intermediate materials – shall be available to educate, train and protect workers from hazards.

Emergency Preparedness, Risk Information and Training

Suppliers will make available safety information on identified workplace risks and suppliers' employees will be correspondingly trained to ensure they are adequately protected. Suppliers will identify and assess likely and potential emergency situations in the workplace and minimise their impact by implementing emergency plans and response procedures.

Waste and Emissions

Suppliers will have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any of these activities that have the potential to adversely impact human or environmental health will be appropriately managed, measured, controlled and handled prior to a release of any substance into the environment. Suppliers will have systems in place to prevent or mitigate accidental spills and releases into the environment.

Resource Conservation and Climate Protection

Suppliers are expected to use natural resources (e.g. water, sources of energy, raw materials) in an economical way. Negative impacts on the environment and climate will be minimised or eliminated at their source or by practices such as the modification of production, maintenance and facility processes, material substitution, conservation, recycling and material utilisation. Suppliers will engage in the development and use of climate friendly products and processes to reduce power consumption and greenhouse gas emissions.

Security

Suppliers will have good security practices across their supply chains. Suppliers will maintain processes and standards that are designed to assure the integrity of each shipment from its origin through to its destination and all points in between. Suppliers are expected to implement the necessary and appropriate measures in their area of responsibility to ensure that products, their workable components or raw materials as well as the corresponding knowhow do not end up in the hands of counterfeiters or third parties and do not leave the legal supply chain.

5. CONTINUOUS IMPROVEMENT

The provisions as set for in this supplier code of conduct provides the minimum standard expected of suppliers to Attollo and expect suppliers to continually improve their performance. Attollo expects suppliers to strive to exceed both international and industry best practices. Attollo also expects that its suppliers encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code of Conduct.