

Seatools supplier code of conduct

Seatools is dedicated to upholding honesty and integrity in all aspects of its operations, adhering to legal requirements and ensuring the fair treatment of every employee and business partner. We take pride in our reputation as a conscientious and dependable partner. Our suppliers form an important part of our operations, and therefore we can achieve our purpose only by working closely with them and act in accordance with below principles of ethical behavior.

1 Business ethics

1.1 Obey the law

Our suppliers are expected to know and comply with all (local) laws and treat the legal requirements as a minimum standard to their business activities.

1.2 Fair competition

We expect our suppliers to compete fairly and ethically and not to conduct business in a way that could violate competition laws. They are expected not to enter into agreements or practices that have a restrictive effect on competition such as price-fixing, division of territories or abuse of a dominant market position.

1.3 No bribery or corruption

Suppliers must have a zero-tolerance policy on corruption and refrain from any form of bribes, kickbacks, extortion, inappropriate gifts or hospitality in connection with Seatools' business. Business gifts or hospitality with Seatools staff or other third parties must be reasonable and customary under the relationship and not intended to influence in any way Seatools business decisions. In business dealings of our suppliers with us, we expect to take decisions based on objective criteria only.

1.4 Conflict of interest

Supplier will disclose any (appearance of) conflict of interest in any business dealings with Seatools and will actively try to avoid such conflicts. In the business dealings of our suppliers with us, we expect that decisions are taken on objective criteria only. Any factors that might influence decisions of our suppliers due to private, business or other conflicts of interest must be prevented from the start.

1.5 Export control

Supplier warrants that it does not violate any national or international export controls or trade, economic or financial sanctions or embargoes applicable to it.

1.6 Intellectual property

Supplier shall respect intellectual property rights. Seatools confidential information and intellectual property must be safeguarded and must not be shared with any third party unless explicitly permitted by Seatools.

1.7 Employee data

Supplier shall protect the personal data of Seatools' employees and customers and use this data for legitimate and authorized business purposes only. The supplier must be clear on when and how they collect, use or share

personal data. The data should be treated with strict confidentiality and be processed in accordance with applicable data protection laws and regulations.

1.8 Conflict minerals

Seatools supports rules and other conflict-free initiatives. Supplier must reasonably ensure that if tin, tantalum, tungsten and/or gold is used in products supplied to Seatools, these minerals do not originate from conflict sources.

2 Environment

2.1 Environmental pollution

Supplier shall comply with all relevant environmental laws and ensure that the necessary permits are in place. It shall operate in a manner that is protective of the environment and make practical efforts to minimize the use of energy, water and raw materials.

2.2 Waste

Supplier shall make practical efforts to eliminate or reduce levels of generated waste and should reuse and recycle waste materials whenever possible.

2.3 Hazardous substances

Supplier shall control hazardous substances in purchased products, production processes and packaging materials and ensure compliance with relevant substance restrictions in applicable laws and regulations such as but not limited to REACH and RoHS.

3 Human rights and social sustainability

3.1 Health and safety

Seatools strives for an accident free, secure and healthy work environment for all its employees and expects its suppliers to do the same. Our suppliers must apply all applicable safety rules and regulations and have a system to report health and safety incidents.

3.2 No forced labour

Supplier shall not use any forms of forced labour like indentured labour/bonded labour or involuntary prison labour. The supplier must work to prevent modern slavery and human trafficking in its business and supply chain.

3.3 No child labour

Child labour shall not be used. Employees must not be hired to work before completing their compulsory education or as determined by applicable laws, in any circumstance. The minimum age for entry into employment must not be younger than 15 years of age or stated by local legislation.

3.4 Working conditions

The supplier shall comply with all applicable legal and regulatory requirements and apply the core principles of the International Labour Organization (ILO). Working hours and wages will be fair and consistent with laws and

industry standards, including those pertaining to minimum wages, overtime, other elements of compensation and legally mandated benefits. The supplier shall respect the rights of employees to establish or join trade unions or similar organizations.

3.5 Equal opportunity and no discrimination

The supplier should work to eliminate direct and indirect discrimination in respect of employment and occupation and shall strive for equal opportunity for its employees.

The supplier shall treat all its employees with dignity and respect and it shall respect human rights and avoid being linked to other parties' involvement in abuse or adverse impact on labour and universally recognized human rights. The supplier does not demonstrate or tolerate harassment of any kind, including on the grounds of race, colour, gender, religion, sexual orientation, origin, age, disability or any other type of behaviour that is hostile, disrespectful, abusive or humiliating.

4 Management

4.1 Subcontractors

The supplier is expected to communicate the business standards laid out herein to their subcontractors and encourage them to comply with the minimum requirements of the Supplier Code of Conduct regarding the protection of human rights, working conditions, no corruption, no bribery, export control and protection of the environment.

4.2 Audit

With prior notice, Seatools may conduct reasonable audits or surveys to verify compliance of our suppliers with the Supplier Code of Conduct.

4.3 Continuous improvement

Seatools expects its suppliers to continuously improve their performance in line with this code of conduct.

4.4 Reporting

The supplier will have a duty to report any actual or suspected misconduct with respect to this code of conduct that involves Seatools.

4.5 Confirmation

We confirm to comply with the business standards and principles provided for in this Supplier Code of Conduct.

Company name :
Name :
Function :
Date :

Signature :