

## BIZLINK CODE OF CONDUCT

Adopted by resolution of the Board of Directors on May 2, 2019

The Company's objective in establishing this "Code of Conduct" is to promote integrity throughout the Company in all of its activities. "Integrity" stands for ethics, honesty and professionalism. It also signifies trustworthiness and incorruptibility within the Company and among its employees and its actions towards all stakeholders to grant corporate sustainability.

Therefore, this Code of Conduct is considered binding for all employees and is consequently implemented in all its aspects. There may be times when ethical questions may arise. We hope that this Code of Conduct will guide the employee to make decisions with integrity. Employees are obligated to strive to be an extension of the Company's interests - always within legal limits - and are responsible for preventing damages and losses to the Company's interests.

The Company expects all employees to abide by this "Code of Conduct" in carrying out their duties and functions to preserve public trust, to ensure responsibility towards stakeholders, society and the environment, and to ensure the Company's sustainable growth and development. The Company also expects to practice this "Code of Conduct" with subsidiaries, joint ventures, suppliers, customers and other individuals working with the Company in order to foster the sustainable development of the economy and society, and to protect the environment.

### **A. ETHICS**

- 1) The Company follows local laws and regulations, and supports related international standards, including International Labor Office Tripartite Declaration of Principles, The OECD Guidelines for Multinational Enterprises, UN Global Compact, UN Universal Declaration of Human Rights and Responsible Business Alliance Code of Conduct, RBA.
- 2) Business Integrity as a General Principle
  - The highest standards of integrity are to be upheld in all business interactions.
  - Fair competition is an important prerequisite for functioning free markets

- The Company expects employees shall have a zero tolerance policy toward any and all forms of bribery, corruption, extortion and embezzlement.
- 3) Rejection of any Form of Bribery or Corruption
- Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage
  - The Company commits to monitoring and enforcement procedures that are implemented to ensure compliance with anti-corruption laws.
- 4) Rejection of Illegal Agreements and Illegal Collusion between Companies
- Agreements and collusion between companies that could prevent, limit or distort competition are prohibited. These include agreement on prices or other conditions as well as arrangements with the goal to allocate customers, markets products or personnel
  - Exchange of the information listed in previous point with competitors is prohibited
  - The Company also does not restrict its suppliers, customers, distributors unlawfully in their market presence and does not abuse any dominant market position it might hold
- 5) Rejection of Insider Trading
- Insider trading laws prohibit the trade (purchase, including short, or sale) of securities while aware of material non-public information, and prohibit disclosure of material non-public information to others who then trade in the affected securities.
  - The potential consequences for the Company's directors, supervisors, officers and employees, as well as those who receive inside information from such people, from a violation of these laws include internal consequences and also civil liability, criminal fines and possible jail terms.
- 6) Transparency and Disclosure of Information
- All business dealings should be transparently performed and accurately reflected on the Company's business books and records.
  - Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

- Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

## 7) Intellectual Property

- Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights and complies with applicable laws
- Customer and supplier information is to be safeguarded.

## 8) Corporate Property Protection

- All employees should protect the Company's assets and ensure their efficient use. The Company's assets, whether tangible or intangible, are to be used only by authorized employees or their designees and only for legitimate business purposes of the Company.

## 9) Fair Business, Advertising and Competition

- Standards of fair business, advertising and competition are to be upheld.

## 10) Protection of Identity and Non-Retaliation

- The Company offers programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers
- The Company provides a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

## 11) Responsible Sourcing of Minerals

- The Company shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or any other country.
- The Company shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

## 12) Privacy

- The Company commits to protecting the reasonable privacy expectations of personal information of everyone the Company does business with, including suppliers, customers, consumers and employees. The Company complies with applicable privacy and information security laws and

regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## **B. LABOR**

### 1) Freely Chosen Employment

- Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is forbidden. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.
- There shall be no unreasonable restrictions on employees' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting Company provided facilities.
- All work must be voluntary and employees shall be free to leave work at any time or terminate their employment in accordance to local legislation.
- The Company and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.

### 2) Child Labor Avoidance

- The Company forbids the use of child labor in any of its facilities. The employee hiring policy specifically states that the use of child labor (under 16 years old) is prohibited and any practice that may lead to the use of child labor is forbidden.

### 3) Working Hours

- Workweeks are not to exceed the maximum set by local law.
- Employees shall be allowed at least one day off per seven-day week. In exceptional situations when the day off cannot be provided due to emergency situations, employees will receive additional free days as a replacement, according to local legislation.

### 4) Wages and Benefits

- Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- In compliance with local laws, employees shall be compensated for overtime at pay rates in accordance to local legal ruling and contractual

agreement between the Company and Employee. For each pay period, employees shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

## 5) Humane Treatment

- The Company and all its Stakeholders shall respect the protection of human rights and shall support the application in daily business.
- There is to be no harsh and inhumane treatment including any physical or psychological violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees, restrictions on freedom of movement; nor is there to be the threat of any such treatment.
- Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to employees
- To the knowledge and power of the Company, becoming complicit or benefiting from all kinds of forced labor as displayed in section (1) shall be avoided.
- With every business action the Company takes, it is actively taking notice and considering the potential implications of its activities and relationships as it relates to human rights.
- To the knowledge and power of the Company, becoming complicit, benefiting, indirectly or silently complicity to violations of human rights shall be avoided and acted upon as soon as knowledge and power to change is established.

## 6) Non-Discrimination

- No employee shall be discriminated because of characteristics that are not related to the inherent requirements of the job.
- The Company's policy stipulates that race, color, gender, age, sexual orientation, disability, nationality, social origin, trade union membership, marital status, political stance or religious beliefs are not factors in the hiring, evaluation and promotion of employees, remuneration, hours of work and rest, security of tenure, job assignments, training and opportunities, job prospects, social security, occupational safety and health.

## 7) Freedom of Association and Bargaining

- In conformance with local law, the Company respects the right of all employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as the right of

employees to refrain from such activities without fear of intimidation or reprisal, in accordance with national law.

- Employees shall not be discriminated against for participating in trade unions.
- An association with trade unions shall influence decisions on applications for employment, decisions for advancement, dismissal or transfer.
- The Company does not interfere with the activities of employee representatives while they carry out their functions in ways that are not disruptive to regular Company operations.
- Employees and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.
- Representative organizations for the purpose of collective bargaining are recognized at the bargaining table. Discussions, information and bargaining process shall be provided in a meaningful way. The use of collective bargaining as a constructive forum for addressing working conditions and terms of employment and relations between the Company and employees is the intended focus for collective bargaining.
- The bargaining process is meant to address, discuss, and solve problems in the following areas:
  - Restructuring
  - Training
  - Redundancy procedures
  - Safety and health issues
  - Grievance and disputes
  - Settlement procedures
  - Disciplinary rules
  - Family and community welfare

## **C. HEALTH AND SAFETY**

### 1) Occupational Safety

- Regional work safety requirements need to be complied with.
- Employee potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training.

- Where hazards cannot be adequately controlled by these means, employees are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.
- Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

## 2) Emergency Preparedness

- Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, employee training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans.

## 3) Occupational Injury and Illness

- Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage employee reporting; classify and record injury and illness cases; arrange necessary medical treatment in case of injury; investigate cases and implement corrective actions to eliminate their causes; and facilitate the return of employees to work

## 4) Industrial Hygiene

- Employee exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls.
- When hazards cannot be adequately controlled by such means, employees are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards.

## 5) Physically Demanding Work

- The Company aims to identify, evaluate, and control employee exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks.

## 6) Machine Safeguarding

- Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to employees.

## 7) Health and Safety Communication

- The Company shall provide employees with appropriate workplace health and safety information and training in the language of the employee or in a language the employee can understand for all identified workplace hazards that employees are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards.
- Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by employees. Training is provided to all employees prior to the beginning of work and regularly thereafter. Employees shall be encouraged to raise safety concerns

## **D. ENVIRONMENTAL**

### 1) Environmental Permits and Reporting

- All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

### 2) Pollution Prevention and Resource Reduction

- Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means.

### 3) Hazardous Substances

- Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

### 4) Air Emissions

- Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge.

## 5) Materials Restrictions

- The Company adheres to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

## 6) Energy Consumption and Greenhouse Gas Emissions

- Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level.
- The Company continuously looks for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

## **E. MANAGEMENT SYSTEM**

The Company's management systems shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Company's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. The following lists the characteristics that the management systems embrace.

### 1) Company Commitment

- The Company upholds corporate social and environmental responsibility policy statements affirming the Company's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

### 2) Management Accountability and Responsibility

- The Company has identified senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs
- Regular senior management review of management system are conducted on a regular basis.

### 3) Risk Assessment and Risk Management

- The Company has a process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with the Company's operations. This process includes a

mechanism to determine the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance

#### 4) Training

- Programs for training managers and employees are in place to implement the Company's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

#### 5) Communication

- A process for communicating clear and accurate information about the Company's policies, practices, expectations and performance to employees, suppliers and customers exists in the Company's procedures

#### 6) Employee Feedback, Participation and Grievance

- Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement are in place.

#### 7) Audits and Assessments

- The internal audit committee conducts periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

#### 8) Documentation and Records

- The Company creates and maintains documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

#### 9) Supplier Responsibility

- A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.