



SUPPLIER CODE OF CONDUCT

SCALINX SAS

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Summary

- Change record2
- Applicable documentation2
- Glossary2
- Introduction3
 - Purpose of the document3
 - Scope of application3
- Compliance with Laws3
- Quality Assurance5
- Sustainability6
 - Environment6
 - Social7
 - Governance7
- Management of the Suppliers’ subcontractors8
- COMPLIANCE MATRIX9

Change record

Version	Date	Author	Brief description of change
00	14/03/2024	Marie BURCH	Document creation
01	02/04/2024	Marie BURCH	Document release after several reviews from Quality Manager and Purchasing Manager + review from legal counsel

Applicable documentation

- Certification ISO 9001:2015
- Certification ISO 14001:2015
- United Nations Declaration of Human Rights
- International Labor Organization Core Conventions
- Restriction of Hazardous Substances Directive (ROHS): Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011, as modified
- Regulation concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH): Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006, as modified
- Waste Electrical and Electronic Equipment Directive (WEEE): Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012, as modified
- EU Conflict Minerals Regulation: Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas
- Conflict Minerals Reporting Template (CMRT) in the latest version available on <https://www.responsiblemineralsinitiative.org/>

Glossary

- Related Companies: Third parties such as auditors, investors, consultancy providers and customers who have a legitimate need to access to the completed matrix and who are bound by appropriate and written confidential agreements.
- Code: This Supplier Code of Conduct.
- Compliance Matrix: The Supplier self-assessment to be filled out, signed and sent to SCALINX.
- Contract: Agreement in place between SCALINX and its Suppliers for the provision of products and services.
- SCALINX: SCALINX SAS
- Subcontractor: Supplier's subcontractors who are part of the supply chain for SCALINX products.
- Supplier: Companies providing products and services to SCALINX.

Introduction

Purpose of the document

The relationship between SCALINX and its suppliers, service providers and subcontractors of all kinds (hereinafter referred to as “Supplier” is an important component in building sustainable business success.

Scope of application

This SCALINX Supplier Code of Conduct (the “Code”) sets out the minimum standards that SCALINX requires its Suppliers to adopt and comply with in their business activities and throughout the supply chain. SCALINX expects from its Suppliers to conduct their activities in strict compliance with all applicable laws and regulations of the countries in which the Suppliers operate, handle goods and/or provide services.

Whilst SCALINX recognizes differences in cultures and legal requirements, SCALINX expects that, as a minimum standard, all business will be conducted in a manner consistent with this Code, irrespective of the location of its Suppliers.

This document is applicable in its entirety to all Suppliers with whom a contract or a purchase order (the "Contract") has been established and who provide products and services to SCALINX. Permission to deviate from some of the requirements described in this document will only be given at the sole discretion of SCALINX and shall be agreed upon with the Purchasing Manager of SCALINX.

Compliance with Laws

[REQ_LAW_1] REGULATORY COMPLIANCE

Suppliers must comply with all laws and regulations applicable to their business, including the local laws and regulations of any country outside their home country in which they operate, handle goods and/or provide services. Suppliers must reasonably cooperate with inquiries or investigations by legitimate authorities, especially in cases involving investigations of corruption, cartels, anticompetitive behavior, and other economic crimes.

[REQ_LAW_2] ANTI-BRIBERY & CORRUPTION

Suppliers must comply with the anti-corruption laws, directives and regulations that apply to their operations in the countries in which they do business, regardless of any local customs. This also includes compliance with anti-corruption laws that may have extra-territorial application.

Suppliers must not offer any illegal payments to, or agree to receive any illegal payments from, any customer, Supplier, their agents, representatives or others. We expect Suppliers to prohibit their employees from directly or indirectly receiving, paying, and/or promising sums of money or anything of value for the purpose of exerting undue influence or obtaining an improper advantage. This prohibition applies even in locations where such activity may not violate local law.

[REQ_LAW_3] CONFLICT OF INTEREST

Suppliers must prevent and avoid any situation that may give rise to a conflict of interest. Suppliers must inform all affected parties of any actual or potential conflict of interest.

[REQ_LAW_4] IMPORT / EXPORT & EXPORT CONTROL

Suppliers must ensure that their business practices comply with all applicable laws, directives and regulations governing the import and export of parts, components, technical data and services.

We expect Suppliers to provide truthful, accurate and regularly updated information (including obtaining signed Commodity Export Classification Certificates or CECC) and to apply for and obtain export licenses, permits and/or other consents as may be required for the export of products from their country(ies) of manufacture.

[REQ_LAW_5] PAYMENT OF TAXES

Suppliers must ensure that they comply with all applicable tax laws and regulations in the countries in which they operate and shall strive to be open and transparent with the tax authorities. Under no circumstances should Suppliers intentionally engage in illegal tax evasion or facilitate such evasion on behalf of others.

[REQ_LAW_6] SOURCING OF MINERALS

We expect Suppliers to provide products made from materials, including constituent minerals, that are responsibly sourced and to support efforts to eliminate the use of any minerals that directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Upon request, we expect Suppliers to provide appropriate reporting by completing the Conflict Minerals Reporting Template (CMRT).

[REQ_LAW_7] COUNTERFEIT PARTS

We expect Suppliers to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of counterfeit parts and materials being supplied. Effective processes should be in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts from re-entering the supply chain. If counterfeit parts and/or materials are detected or suspected, Suppliers should immediately notify the recipients of such counterfeit parts and/or materials.

[REQ_LAW_8] INTELLECTUAL PROPERTY

Suppliers must comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure.

[REQ_LAW_9] PROTECTION OF PERSONAL DATA

We expect Suppliers and their Subcontractors to comply with (i) the European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR); (ii) the laws and regulations adopted to implement the GDPR and (iii) any other applicable regulation (including laws, rules, governmental requirements, codes as well as international, federal, state, provincial laws).

Quality Assurance

[REQ_QUAL_1] QUALITY MANAGEMENT SYSTEM

We expect the Suppliers' activities in connection with the development and manufacture of the products and services supplied to SCALINX to be carried out within a framework that complies with standard ISO 9001:2015 or later. Suppliers must ensure that this compliance is maintained throughout the duration of the Contract. In the event that this compliance is compromised, it shall immediately inform the Purchasing Manager of SCALINX.

Suppliers agree that SCALINX may at any time audit the compliance of the activities with the ISO 9001:2015 standard.

[REQ_QUAL_2] QUALITY REPRESENTATIVE

We expect Suppliers who provide development activities and/or who provide products and services that are part of SCALINX's final product to appoint a person responsible for quality monitoring. His/her name and contact details must be provided to SCALINX.

[REQ_QUAL_3] RESPONSIBILITY

We expect Suppliers to take full responsibility for the quality of the products designed and manufactured or services provided under the Contract. Suppliers are responsible for the quality assurance activities undertaken by themselves and their Subcontractors.

[REQ_QUAL_4] PRODUCT SAFETY AND QUALITY

We expect Suppliers to comply with all laws and regulations on product safety and quality and to deliver products and/or services that meet product safety and quality standards. We expect Suppliers to have quality assurance processes in place to identify any defects and implement corrective actions.

[REQ_QUAL_5] RISK MANAGEMENT

We expect Suppliers to actively manage their risks and not to inappropriately transfer these risks to subcontractors or third parties. Suppliers should share information on relevant risks to ensure that risks can be mitigated.

[REQ_QUAL_6] DUTY TO INFORM

We expect Suppliers to inform SCALINX immediately in writing as soon as the Supplier becomes aware or has reasonable grounds to believe that the Supplier or any of its Subcontractors in its supply chain is in breach of this Code, its own code of conduct, or of any Contract between the Supplier and SCALINX.

[REQ_QUAL_7] FREE ACCESS / AUDITS

Suppliers agree that SCALINX, or a suitable third party on its behalf, is entitled to inspect the Suppliers' premises (incl. all relevant production sites) to the extent necessary to check the Suppliers' compliance with this Code of Conduct or any Contract with SCALINX.

[REQ_QUAL_8] BUSINESS CONTINUITY PLAN

Suppliers agree to define and implement a strategy and a set of provisions to ensure the recovery and continuity of their activities following a disaster or an event that seriously disrupts the continuity of activities related to any Contract with SCALINX. These provisions shall enable Suppliers to fulfil their contractual obligations and meet SCALINX's objectives.

[REQ_QUAL_9] NON-CONFORMITY MANAGEMENT

In case of non-conformity of a supplied item, Suppliers shall, at their own expense, provide technical assistance to solve the problem, including on-site intervention if necessary.

Non-conforming items, with their identification (e.g. labels), shall be kept in a secure quarantine area until an approved written decision is made.

If an item is to be scrapped, a record of the scrapped serial or batch numbers shall be kept and the part shall then, be physically damaged to render it unusable, with the consent of SCALINX.

Sustainability

Environment

[REQ_ENV_1] ENVIRONMENTAL MANAGEMENT SYSTEM

We expect Suppliers to conduct their business in a manner that actively manages environmental risks across their operations, products and supply chain through an environmental management system (EMS) ensuring effective planning, operation and control of environmental aspects. The EMS shall meet the requirements of ISO14001 or other internationally recognized standards. Suppliers shall be well informed about environmental legislation and applicable regulations and be able to demonstrate compliance. The EMS shall include a continuous improvement program.

[REQ_ENV_2] WASTE MANAGEMENT

We expect Suppliers to manage any waste generated by their operations, at the end of its life or classified as waste according to legal requirements and good environmental practices. Suppliers shall establish and maintain procedures ensuring compliance with their waste management obligations.

Suppliers shall first seek opportunities to reduce the generation of waste and secondly to promote reuse and recycling.

[REQ_ENV_3] AIR POLLUTANTS

We expect Suppliers to identify, minimize, monitor, control and treat all hazardous air pollutants and all emissions should be prevented in accordance with international standards and applicable laws.

[REQ_ENV_4] ENERGY EFFICIENCY

Suppliers shall identify the sources of direct and indirect accumulated greenhouse gas (GHG) emissions and define the boundaries (scope of their responsibility). Suppliers shall measure, record and report their significant GHG emissions and shall implement optimized measures to

progressively reduce and minimize GHG emissions under their control. Suppliers shall communicate their level of emissions and reduction targets to SCALINX upon request.

Social

[REQ_SOC_1] TRANSPARENCY

We expect Suppliers to provide employees and third parties with access to appropriate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting. We expect Suppliers to take action to prevent, detect and correct retaliatory actions.

[REQ_SOC_2] HUMAN RIGHTS

We expect Suppliers to conduct their business and operations in a way that respects human rights by treating their own employees and those working for their suppliers with dignity and by promoting fair employment practices. This includes providing fair and competitive wages, prohibiting harassment, bullying and discrimination, prohibiting the use of child, forced, bonded or indentured labor and not engaging in human trafficking for any purpose. In addition, Supplier must respect the legal rights of workers to freedom of association and should not interfere with the rights of workers to legally organize and join associations.

Suppliers are expected to identify risks and actual adverse human rights impacts related to their activities and business relationships. They should take appropriate steps to reduce risk and ensure their operations do not contribute to human rights abuses and to remediate any adverse impacts directly caused, or contributed to, by their activities or business relationships.

[REQ_SOC_3] HEALTH AND SAFETY

We expect Suppliers to establish an appropriate safety management system, including policies aimed at protecting the health, safety and welfare of employees, contractors, visitors and others who may be affected by their activities by striving to eliminate fatalities, work-related injuries, health impairment and by limiting exposure to safety hazards.

[REQ_SOC_4] COMPETENCE AND DEVELOPMENT

Suppliers shall ensure that employees have the education, training and competences required for their position and tasks and that they are aware of the policies, rights and responsibilities related to carrying out their duties.

Governance

[REQ_GOV_1] INFORMATION PROTECTION

We expect Suppliers to ensure that all sensitive, confidential and proprietary information is appropriately protected. Suppliers must not use information for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless prior authorization has been obtained from the owner of the information.

[REQ_GOV_2] SUPPLIER SELF-ASSESSMENT

For evaluation purposes, SCALINX is entitled to request from Suppliers the completion of a suitable supplier self-assessment, hereinafter referred to as “Compliance Matrix”.

The Compliance Matrix shall be sent to the Purchasing Manager of SCALINX by e-mail.

The Compliance Matrix shall be completed with the status of each requirement: Compliant, Partially Compliant, Non-Compliant or Not Applicable: in the last 3 cases, explanations in comments are mandatory.

Please provide further details for all responses. If the requirement requests specific information, please be sure to provide it.

Management of the Suppliers' subcontractors

[REQ_SUP_1] ETHICS POLICY

We expect Suppliers to implement and adhere to their own written code of conduct, containing the expectations of this Code as a minimum standard, and to communicate their principles to the Suppliers with whom they work to provide goods and/or services. We expect Suppliers to maintain effective programs that require their employees to make ethical, values-driven choices in their business dealings, including developing an employee code of conduct and supporting training.

[REQ_SUP_2] TIMELY PAYMENT OF SUPPLIERS

We expect Suppliers to be fair and reasonable in their payment practices with their Subcontractors and with any third parties; and to pay undisputed and valid invoices on time and in accordance with agreed contractual payment terms.

[REQ_SUP_3] COMMUNICATING QUALITY ASSURANCE REQUIREMENTS

We expect Suppliers to communicate all Quality Assurance requirements to their own Subcontractors involved in the manufacturing process, who will do the same with their subcontractors, etc.

COMPLIANCE MATRIX

For evaluation purposes, SCALINX is entitled to request from the Supplier the completion of a suitable supplier self-assessment, by filling out the Compliance Matrix below. The Supplier will co-operate and provide the requested information as far it can be reasonably expected.

The Supplier is herewith informed that the supplier self-assessment can be shared within SCALINX to Related Companies.

Compliance: **C** (Compliant), **P** (Partially Compliant), **N** (Not Compliant), **N/A** (Not Applicable)

Requirement	Title	Compliance	Comments / Proofs
[REQ_LAW_1]	REGULATORY COMPLIANCE		
[REQ_LAW_2]	ANTI-BRIBERY & CORRUPTION		
[REQ_LAW_3]	CONFLICT OF INTEREST		
[REQ_LAW_4]	IMPORT / EXPORT & EXPORT CONTROL		
[REQ_LAW_5]	PAYMENT OF TAXES		
[REQ_LAW_6]	SOURCING OF MINERALS		
[REQ_LAW_7]	COUNTERFEIT PARTS		
[REQ_LAW_8]	INTELLECTUAL PROPERTY		
[REQ_LAW_9]	PROTECTION OF PERSONAL DATA		
[REQ_QUAL_1]	QUALITY MANAGEMENT SYSTEM		
[REQ_QUAL_2]	QUALITY REPRESENTATIVE		
[REQ_QUAL_3]	RESPONSIBILITY		
[REQ_QUAL_4]	PRODUCT SAFETY AND QUALITY		
[REQ_QUAL_5]	RISK MANAGEMENT		
[REQ_QUAL_6]	DUTY TO INFORM		
[REQ_QUAL_7]	FREE ACCESS / AUDITS		
[REQ_QUAL_8]	BUSINESS CONTINUITY PLAN		
[REQ_QUAL_9]	NON-CONFORMITY MANAGEMENT		
[REQ_ENV_1]	ENVIRONMENTAL MANAGEMENT SYSTEM		



[REQ_ENV_2]	WASTE MANAGEMENT		
[REQ_ENV_3]	AIR POLLUTANTS		
[REQ_ENV_4]	ENERGY EFFICIENCY		
[REQ_SOC_1]	TRANSPARENCY		
[REQ_SOC_2]	HUMAN RIGHTS		
[REQ_SOC_3]	HEALTH AND SAFETY		
[REQ_SOC_4]	COMPETENCE AND DEVELOPMENT		
[REQ_GOV_1]	INFORMATION PROTECTION		
[REQ_GOV_2]	SUPPLIER SELF-ASSESSMENT		
[REQ_SUP_1]	ETHICS POLICY		
[REQ_SUP_2]	TIMELY PAYMENT OF SUPPLIERS		
[REQ_SUP_3]	COMMUNICATING QUALITY ASSURANCE REQUIREMENTS		

SUPPLIER NAME: _____

DATE: _____

NAME OF THE REPRESENTATIVE: _____

SIGNATURE OF THE REPRESENTATIVE: _____