

HARPS Global Vendor Code of Conduct

Introduction

At HARPS Global Pte. Ltd. ("HGPL"), we and our affiliates ("HARPS Global"), believe that our success is built on the foundation of strong, ethical partnerships with our vendors. Regarding social, environmental, and ethical issues related to sustainability in our supply chain, we are dedicated to adhering to national and international laws and regulations. This HARPS Global Vendor Code of Conduct is derived from HGPL's internal Code of Conduct for itself and its affiliates, which reflects HARPS Global's core values and principles, and sets forth the standards and expectations HARPS Global has for our selected vendors.

HARPS Global requires that the selected vendors in our supply chain follow the internationally recognized guidelines for social, environmental, business ethics, business operational excellence, and verification. Such internationally recognized guidelines include the RBA Code of Conduct, WRAP principles, amfori BSCI, as well as international conventions such as the International Labour Organization (ILO), UN Guiding Principles (UNGP) as well as UN Global Compact (UNGC).

1. Social Responsibility

HARPS Global is dedicated to making sure that our vendors respect the highest social responsibility requirements, especially with respect to workplace welfare and labor rights. Respecting international labor, worker safety, and fair treatment treaties is a central component of ensuring the highest social responsibility requirements.

Our vendors must therefore:

- a) **Fair Labor Practices:** Ensure that the supply chain is free from child labor, forced labor, and human trafficking of any kind. Workers must freely choose to work for the company and cannot be exploited in any way.
- b) **Freedom of Association and Collective Bargaining:** Recognize and respect the rights of employees to freely associate, join or not join labor unions, seek representation, and bargain collectively. Ensure that employees can communicate openly with management regarding working conditions without fear of negative consequences such as retaliation, intimidation, harm, or harassment.
- c) **Non-Discrimination:** Ensure equal opportunities are given to all workers regardless of an employee's race, religion, gender, age, nationality, social or ethnic origin, pregnancy, sexual orientation, gender identity or expression, political beliefs, disability, marital status, or other personal traits.

- d) **Workplace Health and Safety:** Offer a safe and healthy work environment that includes appropriate safety training, protective gear, and emergency plans, given the potentially hazardous nature of manufacturing process (e.g., chemical exposure, machinery).
- e) **Working Hours and Wages:** Abide by all national and international labor regulations with respect to working hours, overtime, and pay. Fair and timely wage payments are necessary to guarantee that employees are compensated for overtime.
- f) **Harassment and Abuse:** Ensure that there is zero tolerance for any kind of harassment or abuse (physical, verbal, sexual, or psychological), as well as maintain a workplace free from discrimination, harassment, and abuse.
- g) **Young Workers:** Comply with all applicable laws and regulations regarding the employment of young workers. The minimum age for employment must not be less than the age for completing compulsory education and, in any case, not less than 15 years of age. Young workers must not be exposed to hazardous work conditions and their work must not interfere with their education or development.

2. Environmental Responsibility

Environmental impact can come from raw material sourcing, manufacturing process, waste disposal, and carbon emission during the transportation of goods. To use natural resources efficiently and conserve them, vendors must choose sustainable materials and energy sources, and consider environmental impact and ecological diversity. Vendors must commit to minimizing environmental impacts and improving environmental sustainability.

Our vendors must therefore:

- a) **Sustainable Raw Materials:** Make sure that all relevant environmental rules and regulations are followed and that only sustainable materials and methods are used.
- b) **Management of Hazardous Substances and Materials Restrictions:** Follow the relevant rules and regulations pertaining to the use of hazardous substances in the manufacturing of materials. Vendors must reduce the use of dangerous chemicals and make sure that workers who handle them are adequately equipped and trained. Examples of relevant chemical restrictions include California Proposition 65, EU Regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals ("REACH") Substances of Very High Concern, REACH Annex 17 Substances, EU Regulation on the Restriction of Hazardous Substances ("RoHS"), U.S. Environmental Protection Agency Per- and polyfluoroalkyl substances ("PFAS"), Occupational Safety

and Health Administration ("OSHA") standards, and the Environmental Quality Act (EQA).

- c) **Environmental Management System ("EMS"):** try to establish an EMS (such as ISO 14001) to continuously monitor and improve their environmental performance.
- d) **Waste Management:** Have procedures in place to manage waste sustainably, with an emphasis on reducing waste creation, reusing products, recycling, and disposing of waste products in an environmentally friendly manner. Vendors are also encouraged to minimize environmental effects by implementing practices like the 3Rs (Reduce, Reuse, and Recycle) and a Circular Economy to protect communities, natural resources, and the environment.
- e) **Greenhouse Gas ("GHG") Emissions Reduction:** try to set and achieve specific targets for reducing GHG emissions from their activities. This comprises direct emissions (Scope 1), indirect emissions from purchased electricity (Scope 2), and supply chain emissions (Scope 3). HARPS Global alone have very limited influence on climate change; therefore, collaboration with vendors is essential, because we all share a joint mission to make supply chains and operations more sustainable and to reduce greenhouse gas (GHG) emissions across the entire value chain.

3. Business Ethics

Business ethics practices form the foundation of our relationship with vendors. We expect our vendors to uphold the highest standards of integrity, fairness, and transparency in all business dealings.

Our vendors must therefore:

- a) **Anti-Corruption and Bribery:** Comply with all applicable anti-corruption and anti-bribery laws. Any form of bribery, kickbacks, gifts, fraud, corruption, money laundering or unethical business dealings is strictly prohibited.
- b) **Transparency in Business Practices:** Accurately describe their products and services, without using deceptive promotion, false claims, or exaggerations. All marketing and promotional materials must be factual and supported and in line with the relevant jurisdictions laws.
- c) **Intellectual property and confidentiality:** Respect intellectual property rights and refrain from unauthorized use, copying, or dissemination of third-party proprietary

information. Vendors must also ensure that corporate information is confidential and not used to obtain an unfair and unlawful competitive advantage.

- d) **Fair Competition:** Not engage in any anti-competition behavior, including price fixing, bid rigging, market sharing, or cooperation with competitors. Vendors should compete based on the quality, value, and innovation of their goods and services. Vendors must respect others' intellectual property rights, which include patents, trademarks, copyrights, and trade secrets. The unauthorized use or theft of intellectual property is strictly prohibited.
- e) **Disclosure of Information:** Ensure clear communication by providing accurate, timely information to stakeholders, while adhering to legal and contractual obligations. Vendors must inform and obtain consent from individuals before sharing non-legally mandated personal data and comply with the relevant data privacy laws.
- f) **Whistleblowing:** Report or disclose through established channels, any concerns about any improper conduct or misconduct, or failure to comply with the regulatory requirements that is taking place/ has taken place/ may take place in the future. HARPS Global encourages a whistleblower to feel confident in raising disclosures about suspected serious misconduct in their own company or within HARPS Global without fear of retaliation or victimization, even where the disclosure is not subsequently confirmed by an investigation.

4. Business and Operational Excellence

- a) **Commercial and Technical Competitiveness:** Vendors should engage, cooperate, and collaborate with HARPS Global in pursuing continuous improvements of cost-efficiency and process performance in carrying out their relationship.
- b) **Quality:** Vendors should follow the agreed upon specifications and requirements of the National and International Standards on Quality Management.
- c) **Service:** Vendors must ensure that it creates a culture of service excellence. This includes meeting or exceeding customer expectations, anticipating needs, helping to ensure compliance with all applicable laws and regulations throughout our shared supply chain, as well as providing expertise as needed.
- d) **Innovation:** The capacity to innovate is an important, strategic sustainability feature in our supply chain as well as a major competitive advantage in our vendor partnerships. We therefore encourage our vendors to continuously rethink their business models, products, technologies, and processes in cooperation and joint development with HARPS Global.

5. Commitment of Undertaking

All vendors are required to adhere to this Vendor Code of Conduct and respond promptly to any requests for information from HARPS Global. To ensure compliance by our vendors, HARPS Global may choose to perform assessments through the following methods:

- a) **Audits and Assessments:** Vendors must permit audits and evaluations requested by HARPS Global, including audits conducted by independent party, and expect complete openness throughout the audit. HARPS Global will provide a reasonable advanced notice to the Vendor and Vendor is expected to facilitate any such audit or assessment. HARPS Global encourages vendors to conduct its own audits and provide HARPS Global with the respective audit reports or certificates. Even in cases where a vendor has received third-party certification or audit, express recognition of the HARPS Global Vendor Code of Conduct is necessary. HARPS Global may choose to end its relationship or agreement with a vendor if the vendor refuses to participate in the audit or inspection, does not grant access or information to HARPS Global's satisfaction, or disagrees with or refuses to carry out the remediation or corrective action that HARPS Global has requested without any penalty or liability.
- b) **Questionnaires:** Selected vendors will receive questionnaires from HARPS Global in order to collect comprehensive business-related information. The vendor must cooperate by taking part in the questionnaires and provide accurate responses within a timely manner.

By engaging in business with HARPS Global, vendors acknowledge and agree to uphold the principles outlined in this Vendor Code of Conduct. Vendors must demonstrate ongoing compliance and commit to continuous improvement in the areas of social, environmental, business ethics, business operational excellence and verification.

Additionally, vendors acknowledges that HARPS Global will evaluate and modify the Vendor Code of Conduct as needed from time to time in the event that applicable laws, regulations, and relevant policies change. The vendor must abide by the revised Code of Conduct and will be informed of any changes.

Vendor Acknowledgement and Agreement:

Vendor's Company Name : _____

Authorized Representative Name : _____

Title : _____

Signature : _____

Date : _____

By signing this document, the vendor confirms its understanding and acceptance of the HARPS Global Vendor Code of Conduct and commits to adhering to its principles.