

# SUPPLIER CODE OF CONDUCT

Ceetak is aware of its corporate responsibility towards its stakeholders and the environment. Sustainability and integrity is an essential component of our business model and in turn, our suppliers are a vital component of our overall strategy.

This code supports our commitment to respect human rights and uphold international standards. Ceetak expects its suppliers to comply with the applicable national statute, with the principles of the United Nations Global Compact and our Suppliers code of conduct.

This code sets out the minimum standards we expect our suppliers to adhere to and ensure their own business partners meet similar standards.

### **BUSINESS ETHICS**

Ceetak is committed to the highest ethical standards and compliance with all applicable laws, rules and regulations. In particular, Ceetak requires their Suppliers to adhere to the following standards:

# **Bribery and anti-corruption**

The Suppliers must ensure strict compliance to anti-corruption laws within the countries of operation. All types of bribery, corruption (including the Bribery Act 2010) and money laundering are strictly prohibited.

## **Anti-Trust or Fair Competition**

The Supplier must conduct their business in full compliance with any anti-trust or fair competition regulation in place within your jurisdiction of business operations.

## **Gifts**

Suppliers must not practice or tolerate any form of corruption, embezzlement, or money laundering. Suppliers must not offer or accept any bribes, gifts to obtain an improper advantage or influence a business relationship, this can include but is not limited to, fees, commissions, gratuity, services, or any other inducements.

## **Conflict Materials**

Suppliers shall ensure that products supplied to Ceetak do not contain metals derived minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups or foster human rights abuses.

### STANDARD BUSINESS PRACTICES

Suppliers will at all times conduct their business with integrity and protect the privacy of individuals and the security of confidential assets and information.

# **Business Information and Security**

The Supplier must accurately record all business transactions and information and comply with the relative laws and regulations pertaining to the recording and storage of this information. Ensure they maintain accurate records both created and stored in compliance with the regulation pertaining to financial record keeping in your jurisdiction. Responsibly act on behalf of the Company when you are dealing with clients and other suppliers to protect the data and assets of the Company as well as intellectual property.

The Supplier must comply with all applicable data protection laws and requirements when processing any personal data on behalf of Ceetak. They must maintain appropriate privacy and data security measures to protect the integrity and confidentiality of information held on their systems (including information supplied by Ceetak) and ensure there is no unauthorised access to any such information by third parties.

#### **EMPLOYMENT PRACTICES**

The Company maintains a high standard when it comes to human rights and equal opportunity within the workplace. We require our suppliers to comply with this standard in their employment policies as well as keep in line with the current laws and regulations within their jurisdictions.

### **Harassment and Discrimination**

Ensure that the workplace is free of harassment and unlawful discrimination. We will at all times be focused on creating and maintaining a work environment that does not include any form of discrimination, age, race, religion, national origin, disability, gender, marital status, sexual orientation as well as political views or legally protected categories.

## Modern Slavery/Human Trafficking

Ceetak will not tolerate slavery, forced labour or human trafficking in any form. Ceetak requires Suppliers to fully comply with the applicable legal requirements of slavery, forced labour and human trafficking laws (for example, UK Modern Slavery Act 2015) and expects Suppliers to enact practice to ensure compliance with such laws.

### **Child Labour**

Ceetak will not tolerate child labour in any form within our supply chain. Suppliers must comply with the local minimum working age for each position consistent with the International Labour Organisations (ILO) core labour standards and United Nations Global Compact principles. They must at no time be a party to child labour practices or exploitive labour practices.

## **Human Rights**

Ceetak will not tolerate human rights violations in any form. Ceetak expects Suppliers to maintain a safe work environment that promotes mental and physical health and complies with all relevant health and safety regulations. Suppliers should not tolerate physical violence, threats, mental coercion, verbal abuse, or any disrespectful behaviour.

## **Employment Law**

Suppliers must maintain proper employee records in accordance with local regulations and legislation. Clear written employment information should be given to all employees that define remuneration, deductions, and terms of employment. This employment documentation should also clearly define the disciplinary actions and procedures that will govern the interactions between employer and employee.

## **Employment Law**

Suppliers should recognise and respect the rights of employees to freely associate, organise and bargain collectively, if they wish to. In situations where this is restricted by applicable laws, Ceetak expect Suppliers to allow alternate forms of worker representation.

#### **ENVIRONMENT**

Ceetak is committed to reducing the impact of its operations on the natural environment and working with its Suppliers to do the same. The Company and Supplier will at all times work on finding better ways of fulfilling the commitment to the environment and business sustainability.

### **Environmental Footprint**

Suppliers must comply with all applicable environmental laws and regulations. The Supplier will encourage development of products and processes with concern for the future of the environment. They will have a suitable environmental management system and focus on action to conserve resources and energy and promote a culture of environmental awareness amongst all employees.

### **COMPLIANCE**

It is the responsibility of the supplier and its company officers to ensure this Code of Conduct is adhered to. Any transgression or violation of these policies must be reported to the Company officers to prevent damage to the business relationship with the Company's clients and supply chain. Ceetak reserves the right to conduct audits upon reasonable prior notice to evaluate the compliance at its discretion. Suppliers will maintain documentation to demonstrate conformity with the principles outlines in this code of conduct.