

## Supplier Code of Conduct

### Introduction

Prolux are committed to the highest standards of business conduct and practices to maintain the trust and respect of our customers. We base our supplier relationships on lawful, fair and ethical business conduct and practices. We expect our suppliers to adhere to applicable legal and regulatory requirements in all their dealings with us.

Our Code of Conduct is made available to ensure that our suppliers understand our commitment, expectation and requirements of acceptable business conduct and practices. This Code of Conduct applies to all suppliers that provide products and/or services to Prolux and its subsidiaries, joint ventures, divisions and/or affiliates.

### Labour and Human Rights

Prolux requires suppliers and their employees to commit to this Code of Conduct without any exceptions, as a condition of doing business. Suppliers are also expected to comply with any applicable additional policies of Prolux.

- **Prohibit the use of Child Labour**  
Suppliers must always adhere to the minimum age limit for work, under no circumstances shall a supplier permit young workers to perform work that exposes them to mental, physical, social, or moral danger or harm, or that improperly interferes with their educational development.
- **Prohibit all Forms of Forced or Compulsory Labour**  
Prolux is committed to understanding all potential modern slavery risks related to its business and to putting in place steps aimed at ensuring that there is no slavery or human trafficking in Prolux's business or supply chains. Suppliers must not, under any circumstances, participate in human trafficking; forced, involuntary, or slave labour; or purchase materials or services from companies using forced, involuntary, or slave labour.
- **Compensation**  
Suppliers shall ensure that working hours, wages and benefits will be consistent with legal and industry standards, including those regulations pertaining to minimum wages, overtime, mandatory benefits and other elements of compensation.
- **Health and Safety**  
Suppliers must provide workers with a safe and healthy work environment in accordance with all applicable health and safety laws, regulations and standards. Suppliers must comply with Prolux's health and safety policy, as may be updated from time to time, and must report any health and safety incidents in accordance with the terms of such policy. Suppliers must take proactive measures that support accident prevention and minimize health risk exposure. Prolux takes supplier breaches of health and safety laws, regulations and standards seriously and may terminate a supplier relationship where such laws, regulations and standards have not been complied with.

### Environment

Suppliers are expected to conduct their operations in a way which minimizes the impact on natural resources and protects the environment, customers, and employees. Suppliers must ensure their operations comply with all environmental laws and regulations.

Suppliers should refer to and comply with Prolux's Environmental Policy.

**Effective Date:** 22<sup>nd</sup> January 2024  
**Policy Owner:** Managing Director  
**Approval:** SAI Global

## Ethics and Compliance

- Gifts and Gratuities  
Suppliers should refer to and comply with Prolux's Gift and Entertainment policy.
- Anti-Bribery and Corruption  
Suppliers should refer to and comply with Prolux's Anti-Bribery and Corruption Policy.
- Conflicts of Interest  
Suppliers shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest while engaged in business with Prolux. Suppliers shall not enter into any transactions with Prolux employees which could potentially create a conflict of interest. Suppliers are required to immediately report any situations of potential or apparent conflicts between their interests and the interests of Prolux.

### Confidential Information and Data Protection

Proper management of confidential information is critical to the success of both Prolux and its suppliers. Confidential information includes all non-public information that might be useful to competitors or harmful to Prolux or its customers if disclosed. While performing work for Prolux, suppliers may have access to proprietary and/or confidential information. Suppliers are required to maintain the confidentiality of such information entrusted to it and to protect all Prolux information, electronic data, intellectual property, design and technologies with appropriate safe guards using the same care that the supplier exercises with its own proprietary and confidential information. Suppliers shall not disclose such information to any other person without the advance written consent of Prolux unless such disclosure is legally mandated. Any transfer of confidential information must be executed in a way that secures and protects the intellectual property rights of Prolux and its suppliers. Suppliers may receive Prolux confidential information only as authorized by a non-disclosure agreement and must comply with their obligations to not use the information except as permitted by the agreement, and to protect the information from misuse or unauthorised disclosure. Suppliers must respect the intellectual property of Prolux and shall not use Prolux or its affiliates or subsidiaries' trademark, images, patented technology or other materials, including materials of third parties, unless explicitly authorized by Prolux in writing. Suppliers shall do business in a manner that is compliant with the requirements of all applicable data protection and privacy laws and regulations.

A handwritten signature in black ink, appearing to be "Alex Lamblin", written over a light grey circular watermark.

Director  
Alex Lamblin

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