



Apex Supply Chain Technologies Ltd

Code of Conduct

The Apex Supply Chain Technologies Limited (“Apex SCT”) Code of Conduct contains policies, guidelines and instructions that shall guide all Apex SCT Company employees in their daily work.

The Code of Conduct is a set of policies and rules, which forms the basis for Apex SCT management systems and the continuous improvement of financial, environmental and social performance.

1 General Statement

Apex SCT is committed to increasing its value to customers, employees, and other stakeholders by profitably providing products and services to European markets. At the same time Apex SCT shall uphold a high level of ethical standards and be a good corporate citizen at each of its locations.

Apex SCT, and its employees, shall comply with the laws of all countries in which it operates, as well as Apex SCT Code of Conduct.

Apex SCT shall conduct its business operations in accordance with the OECD Guidelines for Multinational Enterprises. It is the responsibility of all employees to ensure, by seeking advice where appropriate, that they are aware of all relevant laws, practices and codes of practice.

Apex SCT employees at all levels play an important role in Apex SCT financial, environmental and social improvement efforts. They shall be properly trained, and they are accountable, within the scope of their responsibilities, for Apex SCT sustainable performance.

Responsibilities in the event of non-compliance

Complaints about non-compliant behaviour can be made to the nearest line manager, or if there is reason to believe that this will be ineffective, to the next management level or to the Company Secretary. All complaints will be taken seriously and investigated where appropriate. There must be no retaliation for good faith reporting of code violation or participating in the Company's investigation of a complaint.

It is the responsibility of each Apex SCT manager to report any case of fraud or other wrongful conduct to the manager of Apex SCT Central Human Resources Department. In the case of non-compliance with Apex SCT Code of Conduct, there will be prompt disciplinary consequences ranging up to and including dismissal.

2 Accuracy of records and finance

Apex SCT shall have accurate record keeping consistent with all applicable standards. This applies to each and every detail of the business. All employees are responsible for maintaining accurate books and records to efficiently manage our business.

3 Business operations

Apex SCT products and services shall be marketed and sold fairly and honestly on the basis of their quality, capabilities, price, service level and other legitimate attributes.

Business Courtesies

Apex SCT employees may not give or accept gifts, favours, entertainment or other inducements unless they:

- are consistent with common business practices
- are not excessive in value and cannot reasonably be construed as a bribe or payoff
- do not violate applicable law
- will not embarrass the Company or the employee if publicly disclosed

Bribery

Apex SCT employees shall not, directly or indirectly, offer, promise, give request, demand or accept a bribe or other improper benefit to obtain or retain business.

Antitrust and Competition Law

Apex SCT shall comply fully and in good faith with the applicable antitrust and competition laws and regulations in countries where we operate.

Supplier/subcontractor relations

Subcontractors will be evaluated and selected on their ability to do the required job competitively and meet the Apex SCT Code of Conduct.

4 Employment

Health & Safety

Apex SCT shall provide a safe and healthy working environment and shall take reasonable steps to prevent accidents and injuries. Workplace violence, including threats, threatening behaviour, harassment, intimidation, assaults and similar conduct, will not be tolerated. Firearms are not permitted at any Apex SCT facility.

Equal Opportunity

Apex SCT shall ensure equal employment opportunities for all qualified individuals, without distinction or discrimination because of age, race, colour, national origin, religion, sex, disability or other characteristics protected by applicable law.

Drugs and Alcohol

Apex SCT employees are not allowed to distribute, possess, use or work under the influence of drugs or alcohol on any Apex SCT premises, or in connection with Apex SCT business without local authorisation.

Unlawful Harassment

All employees shall treat one another with courtesy, dignity and respect, regardless of gender. Apex SCT shall not tolerate sexual or other unlawful harassment involving the solicitation of sexual favours, the initiation of sexual advances by one employee toward another or other unwelcome conduct that creates an offensive or intimidating work environment. Apex SCT managers, supervisors and executives shall be alert to the possible presence of unlawful harassment in the workplace and shall take appropriate steps to prevent any form of such harassment.

Compensation

Apex SCT shall ensure that:

- wages paid at least meet the legal or industry minimum standards.
- information on wages and benefits is communicated clearly and regularly for each employee
- wages and benefits are rendered in full compliance with all applicable laws
- labour hire arrangements and internships are not undertaken to evade the Companies obligations to personnel under applicable laws, social security legislation and regulations.

Working Hours

Apex SCT shall comply with applicable laws and industry standards on working hours.

Forced Labour

Apex SCT shall:

- Guarantee that working hours and working conditions will comply with all statutory requirements. All employees will be treated with respect and no employee will be subject to corporal punishment or coercion of any type.
- Not engage in or support the use of forced labour.

Freedom of Association

Apex SCT respects the right of employees to form and join labour unions within the law of the country where they reside.

Child Labour

Apex SCT shall neither tolerate the use of child labour when conducting business, nor accept products from suppliers and subcontractors that utilise child labour in their contracting, subcontracting or other relationships for the manufacture of their products.

5 Environment

Matters pertaining to the environment, health and safety are an integral part of Apex SCT total operations. Continuous improvements are achieved in these areas through management by objectives. We consider that the greatest effect is achieved through preventive action.

We adhere to an approach that results in long-term sustainable development. Consequently, we strive for high efficiency in the use of energy and natural resources, promote systems for recovery and recycling of materials and work to prevent and minimise contamination.

We strive to offer working conditions that stimulate employees to perform effectively assume responsibility and continue to develop in their personal and professional pursuits.

We shall comply with or exceed environmental requirements set by applicable laws, ordinances and international agreements. We consider that common and environmentally effective requirements and standards should be established at an international level.