



TRISTONE Supplier Code of Conduct

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Preamble

As a Tier-1 supplier of many OEMS all over the world, TRISTONE FLOWTECH GROUP is committed doing the business the right way and to ensure this commitment is also known and accepted by Suppliers and Contractors. TRISTONE FLOWTECH GROUP does not only consider economical aspects regarding their purchase of goods and services, it also considers ecological, social and ethical aspects. TRISTONE FLOWTECH GROUP is guided by the principles of the **UN Global Compact** and has formulated requirements regarding its own business practices in its code of conduct, Health and Safety Policy, Environmental Policy, Quality Policy and Labor Practices Policy. TRISTONE FLOWTECH GROUP expects its supplier and contractors to commit to the same requirements regarding ecological, social and ethical aspects as TRISTONE FLOWTECH GROUP has set for itself.

TRISTONE has formulated its principles and requirements in the Supplier Code of Conduct which apply to all of TRISTONE's suppliers and contractors and which is unconditionally valid and binding. Our suppliers and contractors are urged to take care of society in which they operate by promoting human rights, improving economic, environmental and social conditions, and by encouraging their own contractors and suppliers to behave equally.

In the following, the term TRISTONE refers to TRISTONE FLOWTECH GROUP and the term suppliers refers to both, contractors and suppliers.

Application of the Supplier Code of Conduct

Suppliers of TRISTONE are expected to;

- Comply with principles and requirements stated in Supplier Code of Conduct,
- Have control mechanism in place to ensure the adherence with these principles and requirements in their sphere of influence and can demonstrate these measures if requested,
- Pass on these principles and requirements to their own suppliers in an appropriate way.

TRISTONE reserves the right to review the compliance with these principles and requirements at any time and without notice, or to have it reviewed by independent third parties. Verifications can be carried out at the premises of suppliers. If this applies, suppliers notices and verifications are accomplished in accordance with applicable law.

Suppliers have to communicate significant violations of principles and requirements stated in this policy, which either took place in their company or in the upstream supply chain, to TRISTONE without delay.

In such case, the Supplier has one month to ensure the respective violation ends and gives a proof of that to TRISTONE. If a month is not enough time, after agreement with TRISTONE, the duration can be prolonged to a reasonable time. In any case, TRISTONE requires a proof of the end of the violation.

If the violation does not stop within that time frame or there is no evidence that such violation has been stopped, TRISTONE takes adequate remedial measures like to reach a solution in cooperation with the supplier, increasing its influence over the supplier through sector-wide initiatives, or temporarily cease business dealings with the supplier.

Tristone reserves the right to immediately terminate the contractual relationship, in case of no positive progress on remedial plan within the time frame foreseen, increasing influence over the supplier through sector-wide initiatives would not be effective, a violation of any legal interest.

TRISTONE has the right to conduct regular audits or incident-based audits at the Supplier's production sites in accordance with the Supplier Code of Conduct in a manner that reserves all audit rights .

The auditing person shall be appointed by TRISTONE.



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Human Rights and Working Conditions

Next to the ten principles of the UN Global Compact, TRISTONE is guided by the principles of the **Universal Declaration of Human Rights** and the **Declaration of Fundamental Principles and Rights at Work of the International Labor Organization (ILO)**. The following requirements are based on these frameworks.

Child Labor and Young Workers

Employing children in terms of the ILO Convention 138 on minimum age for Admissions to employment is strictly forbidden. Companies are asked to comply with its recommendations concerning the employee's minimum age. The minimum age shall not fall below the age at which compulsory education ends, and by no means be less than 15 years. Moreover, companies have to ensure that legally young workers that are under 18 years of age do not work at night or overtime and are protected against conditions of work which are harmful for their health, safety or development. The companies should ensure that, Young workers' school attendances are not interfered because of their duties. Young workers daily total duty time and schooling shall not exceed 10 hours.

Wages and Benefits

Suppliers have to ensure that all wages comply with the minimum wage and that there is no cut or withholding of payments due to disciplinary reasons or employment conditions. Employees' remuneration must comply with all applicable laws concerning wages and salaries as well as regulations regarding minimum salaries, overtime hours and statutory benefits.

Working Hours

Working hours and days need to at least comply with applicable local laws, industry standards or ILO Conventions.

In case of necessity, companies should consider that all overtime should be voluntary basis.

Modern Slavery

Modern slavery is a forced or compulsory labor, which any form of labor or service, a person is asked to do under external force or any other form of punishment, which he/she did not declare to do voluntarily. TRISTONE asks its Supplier to ensure, that all employees have the freedom to terminate the employment relationship within an appropriate period of time. Demanding the employee's passport, identification document or work permit as condition for an employment relationship is strictly forbidden.

Companies assure that no work or service will be taken from any person under the threat of any penalty.

Ethical Recruiting

Companies are expected to hire workers lawfully, in line with the International Labor Standards, and in a fair and transparent manner, that respects human rights. Supplier undertakes not to hire unethically, which include such as misleading or defrauding potential workers about the nature of the work, asking workers to pay recruitment fees, and/or confiscating, destroying, concealing, and/or denying access to worker passports and other government issued identity documents.



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Freedom of Association and Collective Bargaining

According to Art. 8 (a) UN social pact, suppliers have to grant its employees the right to form trade unions and join the trade union of their choice. Suppliers have to ensure the right of interest representatives to exercise freely and the right to strike governed by applicable law and contractual obligations. Moreover, all suppliers shall ensure that every employee has the ability to bargain collectively. Suppliers must grant all rights mentioned above as long as applicable national laws and regulations permit them.

Non-Discrimination and Harassment

Harassment against employees in any form is prohibited –including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Companies must ensure that it's not allowed to have such a harsh and inhumane treatment - or the threat of such treatment.

Discrimination against employees in any form is prohibited – this applies to recruiting processes, promotions, fixed salaries and general social interactions. Our suppliers must ensure that no individual is disadvantaged due to race, gender, language, skin color, disability, political or other beliefs, social or national origin, assets, religion, age, genetic features, membership of a national minority, property, disability, pregnancy or sexual orientation. Companies should pay equal wages for work of equal value not only with considering the gender but also all other potential bases for discrimination. However, companies can consider different local living costs.

Women's Right

Companies have to ensure that women are entitled to political, economic and social equality. Pregnancy, breast-feeding period, maternity leave and motherhood should not be an obstacle to the woman employees on recruitments, promotions or any kind of work. Gender discrimination causes problems as unfair opportunity in employment and unequal pay for equal work. Therefore, companies should treat everyone fairly, considering women's rights.

Diversity, Equity and Inclusion

Companies should encourage diversity in all levels of their employees and leadership, including boards of directors. Also, companies should develop and promote inclusive cultures where diversity is valued, celebrated and everyone is able to contribute fully and reach their full potential.

Rights of Minorities and Indigenous Peoples

Companies should respect for the rights of local communities and vulnerable groups to decent living conditions, education, employment, social activities. Companies must ensure that minorities and indigenous peoples are not excluded, ridiculed or otherized.

Land, Forest and Water Rights and Forced Eviction

Companies have to avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.



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Private or Public Security Forces

Companies are free to deploy private or public security forces to protect the business project. In the case of any risk for human rights violations due to inadequate training or control on the part of the company, companies are obliged to take all necessary measures against human rights violations.

Health and Safety

Suppliers are expected to consider the requirements of ISO 45001. Companies should do the risk assessment regularly, have "zero accident" target, and manage incident and accidents properly. They are obligated to ensure machine safety and provide a working environment (e.g. regarding machines, chemical, working material, personal protective equipment items and working procedures), which does not threaten the physical integrity or health of their employees. The implementation of appropriate actions to reduce the risk of accidents and the improvement of working conditions are the major aims.

Employees must receive trainings on health and safety at work. The workplace as its environment must have appropriate emergency exits, fire protection equipment (as smoke alarms, fire extinguishers, sprinklers, etc.) and adequate illumination.

Employees must have guaranteed access to drinking water, sanitary facilities and social areas, which are established and maintained in accordance with appropriate legal regulations. Food provided by the company, spaces for food preparation and food storage facilities available to employees must comply with minimum hygiene standards. Housing for employees provided by the company have to be clean and safe and provide an appropriate space for living.

Employees have to be prepared for emergencies. Preparing before an emergency incident plays a vital role in ensuring that employers and workers have the necessary equipment, know where to go, and know how to keep themselves safe when an emergency occurs.

Companies must provide guidance to employees on how to handle chemicals and/or biological substances without harm to health. Companies should adequately control exposure to both chemical and biological agents, which cause health problems in the work place.

Business Ethics

Companies should have a formal policy, which covers business ethics with below sub-titles:

Anti-Corruption and Anti-Money Laundering

TRISTONE does not tolerate corruption. In any business activity or relationship, a maximum degree of integrity is expected to comply with every applicable anti-corruption law. They must ensure that no form of corruption, bribery, extortion and embezzlement is tolerated. Moreover, suppliers must not grant or receive gifts that are not legally permitted.

Supplier shall observe the relevant statutory provisions on money laundering prevention and comply with its reporting obligations.



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Data Protection and Data Security

If personal data is handled, the law protects privacy. Suppliers undertake to protect the personal data of employees, customers, suppliers and other persons concerned. Companies only gather, process, use and store personal data for which this is prescribed by law or required for their regular business operations.

Financial Responsibility

Companies are responsible for accurately recording, maintaining and reporting business documents including, but not limited to, financial accounts, quality reports, time records, expense reports and where appropriate notices customers or regulatory authorities. Books and records are expected to be maintained in accordance with applicable law and generally accepted accounting principles.

Disclosure of Information

Companies are responsible for disclosing financial and non-financial information in accordance with applicable regulations and prevailing industry practices and, where appropriate, disclosing information regarding workforce, health and safety practices, environmental practices, business operations, financial condition and performance.

Fair Competition and Anti-Trust

One of the prime responsibilities of the Companies is to comply with competition rules. Any kind of competition distortion (e.g. price fixing, bid rigging, improper market allocation, bribery, corruption etc.) is strictly forbidden. In particular, abuse of dominant position will not be tolerated alongside agreements or concerted practices with other companies that have the purpose or effect of preventing, restricting or distorting competition in accordance with applicable antitrust regulations.

Conflicts of Interest

Companies must care if an individual or a corporation is in a position not to exploit their own professional or official capacity in some way for personal or corporate benefit.

Counterfeit Parts

It's strictly forbidden to use counterfeit parts. Companies must ensure that they develop, implement and maintain methods and processes for their products and services to minimize the risk of introducing counterfeit parts and materials into deliverables. Companies are also expected to establish effective processes for detecting counterfeit parts and materials and, if detected, quarantine the materials and notify Tristone and/or law enforcement as appropriate. Finally, companies are expected to confirm that all sales to non-OEM customers comply with local laws and that the products sold will be used in a lawful manner.

Intellectual Property

Intellectual property laws protect the valuable assets of the companies (patents, trademarks, regulatory data, copyrights, trade secrets, domain names and related rights). TRISTONE respects intellectual properties and expects the same from its Suppliers.



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Export Controls and Economic Sanctions

The Supplier shall comply with international customs export control regulations, economic sanctions, governmental regulations and ensure the proactive exchange of information relevant to foreign trade with the purpose of a secure supply chain.

Environment

TRISTONE complies with all applicable legal requirements, customer requirements and is guided by the elements of ISO 14001. TRISTONE presents a systematic approach to environmental management by using a lifecycle perspective.

In accordance with TRISTONE Environmental Policy, TRISTONE constantly strives to reduce its negative impact on the environment with a particular focus on:

- GHG emissions, energy efficiency and renewable energies
- Water treatment systems – water quality and consumption
- Air quality
- Sustainable resources management and waste reduction
- Responsible chemical management

Additional to TRISTONE Environmental Policy, TRISTONE also focuses on:

- Decarbonisation
- Animal welfare
- Biodiversity, land use and deforestation
- Soil quality
- Noise emissions

TRISTONE expects also the same commitments from its Suppliers throughout the supply chain.

GHG Emissions

TRISTONE expects from its suppliers to manage and monitor Greenhouse gases emissions.

Energy Efficiency

TRISTONE expects companies to monitor efficient energy utilization. Companies ensure that the energy received is used productively.

Renewable Energy

If technically and economically possible, TRISTONE expects companies to use renewable energy.

Decarbonisation

TRISTONE expects from its suppliers to reduce Greenhouse gases emissions and carbon footprint by target based approach.



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Water Quality, Consumption & Management

Water sources must be protected by companies for future generations.

Air Quality

Companies have to care about air quality, the output of operations should not exceed the level of legal air pollution.

Responsible Chemical Management

Chemicals and other materials of suppliers, which might have a negative impact on environment, shall be identified and labeled accordingly. A hazardous substance management shall be implemented for a safe handling, transport and storage.

The disposal of the chemicals should be fulfilled according to local laws.

Sustainable Resources Management

TRISTONE expects from its suppliers to optimize all kind of operations to conserve sustainable resources.

Waste Reduction

TRISTONE expects from its suppliers to optimize all kind of adverse impacts of operations to mitigate waste and preserve resources.

Reuse and Recycling

Suppliers should focus on reusing or recycling the wastes, which do not have any adverse effect on products. Non-recyclable products must be disposed according to local laws.

Animal Welfare

Suppliers must manage all operations by considering not harming any animal habitat.

Biodiversity, Land use, Deforestation

Companies must protect ecosystems and biodiversity, in a manner that flora and fauna are not lost and natural habitats do not suffer irreparable damage.

Soil Quality

TRISTONE expects from its suppliers to maintain the soil quality, which has a direct impact on the environment and human health.



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Noise Emissions

Suppliers have to ensure that the noise emission controls are done and the results are within the legal limits.

Whistleblowing and Protection against Retaliation

In case of identified deviance as regards to any topic described here, or even any doubt concerning a behavior, any person in TRISTONE or in supply chain organization is encouraged to disclose the observed situation by using the appropriate channel of communication. Unless otherwise specified in this code of conduct, you can escalate the identified matter by using the channel below:

- TRISTONE website, on Company/Compliance webpage <https://www.TRISTONE.com/company/compliance>
- Click on External link to whistleblower portal.

You can report anonymously your matter. Our policy in this field is clear: we take any message seriously and act accordingly, assuring privacy and professional secrecy. We are committed to follow up incoming matters.

Supplier's Acceptance and Consent

By receiving this Supplier Code of Conduct or starting business with TRISTONE, the Supplier accepts the Supplier Code of Conduct and agrees to act responsible and in line with the requirements from this document. The Supplier agrees to communicate the requirements from this SCoC to its own suppliers and to take action where needed to prevent violations of any right from this SCoC.

1st March 2023

A handwritten signature in black ink, appearing to read "Ignacio SF", written over a horizontal line.

Ignacio Salazar Fabregas
CEO & President

A handwritten signature in black ink, appearing to read "Gian Franco Buscemi", written over a horizontal line.

Gian Franco Buscemi
Vice President Purchasing



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History of revisions

Revision	Changes to former release	Author	Date
0	Initial release	M. Placek	04.11.2021
1	Update for SAQ 5.0 version of the "Drive Sustainability" platform.	G. Yilmaz	01.03.2023

Date of first issue	Revision done by	Checked by	Released on
04.11.2021	G. Yilmaz	CEO, Vice President Purchasing	01.03.2023