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Brink Group

SUPPLIER CODE OF CONDUCT

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1 CODE OF CONDUCT

1.1 PURPOSE

Brink Group conducts its business and engages suppliers in a global environment. Brink Group's commitment to responsible business practices guides our behavior as a company wherever we do business, hence ensuring responsible sourcing decisions, protecting our commercial interests and upholding our social responsibility.

This document addresses Brink Group's relationships with suppliers and outlines the *directives* that any supplier **must** fulfil to meet the general values of Brink Group. When a supplier is found not to be following an agreed directive, Brink Group will take appropriate action, including demands for corrective measures, or termination of the relationship with the supplier.

This document also includes *guidelines* that offer support to the supplier in meeting Brink Group's directives. If a supplier follows Brink Group's guidelines they will fulfil Brink Group's directives as a result.

1.2 BRINK GROUP DIRECTIVES

The following directives represent the minimum requirements that all Brink Group suppliers **must** meet:

- **Child Labour**- Supplier **must not** engage in or support the use of child labour.
- **Women's rights** – Supplier **Shall** respect women's rights
- **Forced Labour and slavery** – Supplier **shall not** utilize prison or forced labour in contract relationships in the manufacture and finishing of our products, nor purchase materials from a business partner utilizing prison, forced labour, human trafficking or slavery.
- **Discrimination** - Supplier **shall not** tolerate any form of discrimination.
- **Disciplinary Practices** - Supplier **shall not** engage in or support the use of corporal punishment, mental or physical coercion, or verbal abuse.
- **Working Hours** - Supplier **shall** comply with laws and the industry standards on working hours in the country where the supplier operates.
- **Remuneration** - Supplier **shall** ensure that wages paid for a standard working week **shall** always meet at least legal/industry minimum standards and **shall** be sufficient to meet basic needs. Disciplinary deductions **shall** not be applied.
- **Freedom of Association** – Supplier **shall** respect workers' rights to form and join organizations of their choice and to bargain collectively. We expect our suppliers to respect the right to free association and the right to organize and bargain collectively without unlawful interference.
- **Health and Safety**- Supplier **shall** have accurate reporting of all accidents and incidents as well as a continuous improvement of health and safety operating procedures to generate a safe and sustainable working environment for all employees.
- **Environment** - Supplier **shall** comply with all current environmental legislation in the location where they operate and as well have procedures in place to safeguard that all ingoing material and components through their value chain are manufactured in accordance with current environmental legislation. All suppliers **shall** be able to demonstrate they are taking initiatives to reduce their environmental impact.
- **Risk Management and Business Continuity Management** – Supplier **shall** implement appropriate strategies and processes that identify, analyse, and manage risks associated with their activities in order to minimize the impact of undesired and unexpected events on the supplier's ability to deliver products to Brink Group. The supplier **shall**, based upon the risk assessment, anticipate a variety of probably crisis scenarios and based on these develop, test and maintain plans for crisis management and business recovery.
- **Binding requirements towards tier-1 suppliers** - Supplier **shall** ensure that its subcontractors and sub suppliers comply with this Code, and pass on standards along the supply chain (Tier 1,2,X).

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1.3 MORE DETAILED INFORMATION ON DIRECTIVES CAN BE FOUND IN APPENDICES A THROUGH F BRINK GROUP GUIDELINES

The following guidelines represent principles on which Brink Group conducts its business:

- We respect the rights of the individual, and we act in accordance with fair business, marketing and advertising practices.
- We respect the rule of law, conduct our business with integrity and honesty and are accountable for our actions.
- We do not engage in illegal industrial co-operation.
- Comply with all applicable laws relating to the prevention of bribery, corruption, fraud, money laundering, extortion, embezzlement, tax evasion or similar or related activities.
- We encourage our employees to avoid situations where loyalty to the company may come into conflict with other personal interests.
- We are committed to open and transparent communications within the bounds of commercial confidentiality.
- We demonstrate good faith and mutual respect in dealing with employees and their representatives in the workplace.
- We observe local customs.
- We expect our business partners to be law-abiding and to comply with legal requirements relevant to the conduct of all their businesses. We also expect our suppliers to co-operate appropriately with authorities in the countries where the supplier operates and respond upon requests from the authorities in a timely, correct and well-documented way.

More detailed information on guidelines can be found in Appendices A through F

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2 APPENDICES

2.1 APPENDIX A- CHILD LABOUR

PURPOSE

Labor often interferes with children’s education. Ensuring that all children go to school and that their education is of good quality are keys to preventing child labor. ‘Child’ thus refers to any person below 15 years of age (14 years of age in countries operating under the ILO convention 138), unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply.

BRINK GROUP DIRECTIVES

Brink Group Suppliers **must not** engage in or support the use of child labour.

GUIDELINES

The Supplier should establish, document, maintain and effectively communicate to personnel and other interested parties policies and procedures relating to child labour.

The company should not expose children or young workers to situations in or outside of the workplace that are hazardous, unsafe or unhealthy. It is the supplier’s responsibility to arrange remedial teaching and if necessary to finance such teaching of child workers displaced by the implementation of relevant child labor practices and to promote the effective education of all their young workers while ensuring them a safe and healthy working environment.

- All Brink Group Suppliers should comply with local/national legal requirements through cooperation with Government Social Services and/or Department of Labour inspection agencies.
- Documentary evidence for proof of age should be available upon recruitment.
- Apprenticeships should not be misused as a way to pay young workers less than adults. Payroll records should show that young workers receive equal pay for equal work and apprenticeship schemes are for a defined period of time with structured oversight by or registration with a government agency.
- Records of payment of stipends, tuition, books and/or uniforms by company should exist.
- Workers and their family’s testimony should support documentary evidence of compliance.
- Community interviews, especially with teachers, social workers and child welfare advocates, should confirm that they have worked with the factory to address any child labour risks.

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2.2 APPENDIX B- DISCRIMINATION AND WORKING CONDITIONS

PURPOSE

To ensure equal and respectful treatment for all workers in all matters, employees should be employed, trained, promoted and compensated solely on the basis of their job performance and they should be free from all types of indecent verbal, physical and all other types of harassment and other discriminatory practices. Considering but not limited to; elder people, young workers, pregnant people, disabled people, difference in genders (e.g. respect women's rights)

BRINK GROUP DIRECTIVES

Supplier **shall not** tolerate any form of discrimination.

GUIDELINES

Discrimination refers to any distinction, exclusion or preference, which has the effect of nullifying or impairing equality of opportunity or treatment. Not all distinction constitutes discrimination. For instance, a merit or performance-based raise or bonus is not by itself discriminatory.

- The Supplier should have a non-discrimination policy directing actions should any cases occur and it should be communicated to all personnel.
- All workers should understand how to file a complaint or raise concerns about any management action that violates that policy.
- Wage records of workers should indicate equal pay for work of equal value.
- Testimony of workers/unions/councils should support documentary evidence of compliance.
- Job announcements and advertisements are posted prominently in the workplace and do not specify race, gender or other personal characteristics of potential employees.
- The supplier shall ensure ethical recruiting. New employees shall be selected without discrimination on for example but not limited to; age, gender, race.
- Records for hiring, promotion, compensation should support evidence of compliance.
- We encourage a workforce that includes members from diverse social/ethnic groups.
- Workers should be able to observe religious holidays.
- Pregnant and nursing women who are employed will not be discriminated against when pregnant or receiving maternity benefits.
- A diversity policy should indicate equal opportunities for advancement.
- There should be an absence of lawsuits or government citations for discriminatory practices.
- Employers permit, without any direct or indirect impediment or negative consequences for any workers, efforts towards workers organizing trade union membership, collective bargaining and freedom of association.
- Our suppliers must respect the rights of Indigenous peoples and other communities.
- Our suppliers must not allow the unlawful eviction and deprivation of land, forests and waters.
- Our suppliers must ensure that all private or public security forces are properly trained, instructed and controlled, so that they do not endanger the life or safety of any person or prevent workers from their rights uphold the freedom of association.

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2.3 APPENDIX C- DISCIPLINARY PRACTICES

PURPOSE

In cases where employees break company rules or policies it is sometimes necessary to apply disciplinary measures. This chapter aims to present guidance for these occurrences.

BRINK GROUP DIRECTIVES

The Supplier **shall not** engage in or support the use of corporal punishment, mental or physical coercion, or verbal abuse.

GUIDELINES

- When determining disciplinary measures or giving performance reviews, employers should demonstrate respect for employees' mental, emotional and physical well-being.
- Procedures should be defined and followed for matters relating to employee performance evaluations and disciplinary action. These procedures should be applied consistently and not arbitrarily to every employee.
- If disciplinary action is necessary, there should be a progressive course of action, beginning with verbal or written warnings before more serious disciplinary action is taken. Fines or wage deductions for disciplinary purposes are not allowed.
- All legal disciplinary measures should be communicated to all personnel involved to keep them informed.
- Records should detail any violations of the discipline policy by management.
- Records should support the existence of appeal procedures in cases where disciplinary measures have been questioned by employees.
- Workers and unions/work councils should be familiar with the company's disciplinary policies and procedures and feel able to register appeals without any negative repercussions.
- Workers should know their rights and the procedures for filing complaints.
- Training and/or written information should be offered to all employees regarding disciplinary policies and procedures.
- Disciplinary actions against employees should be well documented.
- Disciplinary actions should comply with national laws and related regulations.

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2.4 APPENDIX D- WORKING HOURS

PURPOSE

Brink Group recognizes that a healthy balance should be maintained between work and spare time.

BRINK GROUP DIRECTIVES

Suppliers **shall** comply with laws and industry standards on working hours in the country where the Supplier operates.

GUIDELINES

Under certain conditions the Supplier can demand overtime, especially during peak seasons. Unless the collective bargaining agreement regulates the use of overtime the company will apply overtime work under certain conditions.

- Overtime and piecework wage records should be maintained.
- Worker testimony on voluntary overtime should exist.
- There should exist a Company corrective action plan to address any problems with working hours.
- The quantities of products produced should be feasible based on the number of workers and the volumes are consistent with the capacity to complete during working normal hours.
- Levels of fatigue-related accidents should not be excessive.
- Labour agreements should define employer/worker agreement on when or under what circumstances overtime can be required and those clauses are in compliance with national law.

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2.5 APPENDIX E- REMUNERATION

PURPOSE

To ensure that workers are compensated for the adequate performance of their work and paid in full, wages earned for regular hours worked must be sufficient to meet the basic needs of the worker. It should not be necessary to work overtime to earn a basic needs wage.

BRINK GROUP DIRECTIVES

The Supplier **shall** ensure that wages paid for a standard working week **shall** always meet at least legal/industry minimum standards and **shall** be sufficient to meet basic needs. Disciplinary deductions and/or withholdings **shall not** be applied.

GUIDELINES

The company should ensure that deductions from wages are not made for disciplinary purposes, and should ensure that wage and benefit remuneration are detailed clearly and regularly for workers. The company should ensure that labour-only contracting arrangements and false apprenticeship schemes are not undertaken in an effort to avoid paying benefits or fulfilling its obligations under applicable labour laws and social security legislation.

- Wage slips, payroll records and/or time cards should confirm that adequate wage payments are being made in a timely fashion and clearly explained to workers.
- Wage adequacy should be confirmed by worker interviews, local government data, and/or local experts such as trade union representatives.
- Wages should equal or exceed the higher of: the minimum wage, the prevailing industry wage, or wages in a comparable unionized workplace.
- Basic needs calculation used by managers should be up-to-date and logical, using appropriate data resources.

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2.6 APPENDIX F- HEALTH & SAFETY

PURPOSE

Continuous improvements towards an safe work place considering physical as well as mental health.

BRINK GROUP DIRECTIVES

The Supplier **shall** have accurate reporting of all accidents and “near misses” as well as a continuous improvement of health & safety operating procedures to generate a safe and sustainable working environment for all employees.

GUIDELINES

The Supplier should ensure that any accidents or “near misses” are reported according to laws and requirements in the country where the supplier is operating. All accidents should be documented with root cause analysis and actions taken to prevent reoccurrence. A defined process for following up decided actions should exist as well as evidence of completed actions.

All workplaces should be assessed with the aim to identify potential risks. These risks should be evaluated against applicable health and safety legislation and/or industry practice.

The Supplier should ensure that all employees use the necessary personal protection to mitigate risks identified in the assessment and that all employees receive the relevant training in safety procedures, rules and as well how to use machine protections.

The supplier should ensure that procedures are implemented so that also contract workers and visitors receive the relevant information and use personal protection to avoid any accidents.

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2.7 APPENDIX G- ENVIRONMENT

PURPOSE

Brink Group commits to support the long term preserving of a sustainable society and thus integrates environmental considerations into our business planning and decision making. This is including product research and development, new manufacturing methods and value chain management where our suppliers have a large impact.

BRINK GROUP DIRECTIVES

The Supplier **shall** comply with all current environmental legislation in the location where they operate and as well have procedures in place to safeguard that all ingoing material and components through their value chain are manufactured in accordance with current environmental legislation. All suppliers **shall** also strive to reduce the environmental impact and set annual environmental targets.

GUIDELINES

In order to ensure compliance with all current legislation the Supplier should implement procedures to identify legislation that is relevant for its business including procedures how to identify changes to legislation, processes to verify that all parts of the Suppliers organization is in full compliance and a method to immediate escalate and correct any deviations. Any material standards and/or product standard specified for the Brink Group products outlining requirements on environmental aspects or substances not allowed should be implemented in the same way as legal requirements.

Brink Group prefers suppliers that are ISO14001 certified and as a part of their Environmental management system continuously take initiative to reduce the environmental impact above and beyond the legal requirements. The Suppliers environmental targets and continuous improvement work can include, but is not limited to, the following areas:

- Product design proposals to reduce energy consumption in manufacturing, reduce weight and/or transport volume, increasing the material portion that is from reusable or renewable materials
- Improvements to reduce GHG emissions through freight, transport, energy consumption, fuel consumption not limited to suppliers own production also considering the full supply chain (scope,1,2,3)
- All suppliers shall comply with relevant legislation on decarbonization. This includes the Paris Agreement (COP 21). Also, suppliers shall disclose information about greenhouse gas emissions when asked by (local) governments or other legal bodies.
- All suppliers shall decarbonize in own facilities but also incentivize their own suppliers to do the same
- Reusable packaging solutions
- Monitoring energy, water and waste consumption and encourage reductions
- Use of renewable energy and elimination of fossil sources like natural gas and oil. Also, suppliers shall report about energy consumption and energy reduction results to the government when mandatory and encourage suppliers or other business partners to strive for optimal energy efficiency and use of renewable energy as well.
- Reductions in facility energy consumption by e.g. efficient machinery use, reduction of heat loss, minimizing need for air cooling.
- Take reasonable steps to ensure that they do not cause harmful soil changes, water pollution, air pollution, harmful noise and radiation emissions, excessive water consumption or risk animal welfare (sustainable resource management).
- The risks to those involved in the use of hazardous materials, chemicals, and substances, and responsibility to prevent, minimize, or end these risks. This also applies for emissions of dangerous substances (e.g. air pollution)

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- Reduction of waste-to-landfill as possible and reuse as many materials as possible. Also, suppliers are encouraged to use recycled materials instead of raw materials.
- Our suppliers shall protect natural ecosystems and not contribute to changing, deforestation, or damage of ecosystems. Moreover, all suppliers shall protect the biodiversity and respectful use of land.

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2.8 APPENDIX H- RISK MANAGEMENT AND BUSINESS CONTINUITY MANAGEMENT

PURPOSE

Risk management serves the purpose to minimize the risk for a business interruption. There is no known way to completely eliminate all risks that can materialize into losses but with an efficient risk management the frequency and impact can be reduced. The business continuity management will make the time from an event to a normalized business situation as short as possible.

BRINK GROUP DIRECTIVES

The Supplier **shall** implement appropriate strategies and processes that identify, analyze and manage risks associated with their activities in order to minimize the impact of undesired and unexpected events on the Suppliers ability to deliver products to Brink Group.

The Supplier **shall**, based upon the risk assessment anticipate a variety of probable crisis scenarios and based on these, develop, test and maintain plans for crisis management and business recovery.

GUIDELINES

Brink Group prefers suppliers that have in place processes to continuously evaluate risks and in any major change of layout or building construction take the opportunity to reduce risks. Risks included in evaluation can include, but is not limited to, the following areas:

- Fire and fire spread between areas/buildings
- Natural hazards such as flooding, tornados, snow, earth quakes
- Terrorism, purposely initiated machine failure, disputes and war
- Explosions, unexpected machine wear or wrong handling of key equipment
- Power outage or other utilities
- Key personnel unavailable
- Computer system availability
- Sub-suppliers ability to deliver
- Compliance with all applicable privacy, data protection and cybersecurity laws and regulations

Where the Supplier deems the risk significant, mitigating activities should be put in place. Examples of such mitigating activities are fire separations, sprinklers and limitation of access to key areas such as server rooms or key machinery.

Based on the identified risks, plans for crisis management and business recovery should be implemented. The Crisis Management Plan should provide guidance in the early stage, just after the event, on how to safeguard the employees, visitors and other assets (such as buildings, machinery and tools) of the company towards further damage.

The Business Recovery Plan should provide strategies on how to effectively get back to business as soon as possible after a major business interruption. The plan can include information about organization, alternative manufacturing facilities or outsourcing options, alternative equipment, tool and machinery suppliers or alternative IT set up.

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2.9 ETHICS, ANTI-BRIBERY AND CORRUPTION

PURPOSE

Organizations shall conduct business in an ethical correct way without taking bribes or involvement in corruption.

BRINK GROUP DIRECTIVES

The Supplier shall implement appropriate strategies and processes that identify, analyze and remove risks in the field of bribes and other forms of corruption. All suppliers must conduct ethical business in all ways.

GUIDELINES

- Suppliers are required to accurately record and disclose information regarding their business activities. This includes the financial structure, financial situation, and performance in accordance with applicable laws and regulations.
- Suppliers are expected to comply with applicable standards and requirements for all locations and markets in which they conduct business. Also, suppliers must use sound financial practices and ensure transparency in financial dealings by implementing and maintaining adequate internal controls
- Suppliers are required to publish relevant information when this is mandatory due to legislation. Suppliers shall take appropriate actions to protect it from misuse and unauthorized disclosure.
When disclosing (financial) information, suppliers have to comply with privacy and information security laws and regulations. Especially when sharing personal data related to suppliers, customers or employees.
- Suppliers must comply with all applicable fair business, advertising and competition laws. Suppliers must commit to fair trading and antitrust laws. Fair and unrestricted competition is a core element of a free economy. Therefore, suppliers shall not enter restrictive agreements with all kind of business partners. This includes, but is not limited to, agreements with competitors about prices, market allocation by customers or regions with competitors. This also includes unlawful exchange of competitively sensitive information with competitors.
- Suppliers must seek to identify and report any conflicts of interest promptly, be it competing personal or professional interests. Our suppliers must avoid even the appearance of conflicts of interest in their work with us.
- Suppliers must agree to not use or sell counterfeit parts or being part of a supply chain in which counterfeit parts are used. Counterfeit parts are items that are not as represented with the intention to deceive its buyers or users.
- Suppliers must respect intellectual property rights and act in a manner protecting intellectual property rights.
- Suppliers must ensure with adequate procedures that their business practices are in compliance with Export Control laws and regulations. These include e.g. US, EU and applicable national regulations. Also, suppliers have to provide truthful and accurate export control information and obtain export control licenses and/or authorizations. This information has to be shared with governments or other relevant parties when required.
- The management system must be designed to provide stakeholders and workers access to an easily accessible and comprehensible grievance mechanism and/or whistle blowing policy to raise concerns confidentially without fear of retaliation.