



Code of Conduct for Suppliers

Content

1. Introduction	3
2. Requirements	4
2.1 Compliance with laws and adherence to generally accepted standards	4
2.2 Product conformity and safety	4
2.3 Antitrust law, economic and trade sanctions	4
2.4 Combating bribery and corruption	4
2.5 Maintaining complete books of account and records	5
2.6 Conflicts of interest	5
2.7 Protection of tangible and intangible assets	5
2.8 Dealings with employees and others	6
2.9 Environmental protection and sustainable entrepreneurship	7
2.10 Conflict minerals	7
2.11 Data protection	7
3. Implementing the Requirements	8

1. Introduction

RugGear GmbH and its worldwide affiliated companies (hereinafter referred to as “RugGear ” or “Us”) are committed to ecologically and socially responsible corporate governance. We expect the same behaviour from all our suppliers (“You”). We also expect our employees to observe the principles of ecological, social and ethical behaviour and integrate these in the corporate culture. We strive to continually optimise our business activities and our products and services in terms of sustainability. Our suppliers are requested to contribute to this in the sense of a holistic approach and pass on this Code of Conduct to their sub-suppliers.

2. Requirements

2.1 Compliance with laws and adherence to generally accepted standards

As our supplier, you must be aware of and comply with all applicable international, national and local laws and regulations, contractual agreements and internationally accepted standards. You must also conduct your business practices in line with generally accepted industry standards, obtain and keep up to date all applicable permits, certificates, licenses and approvals, and conduct your activity at all times in accordance with the restrictions and requirements set out in the permits.

2.2 Product conformity and safety

As a leading international developer and manufacturer of rugged mobile phones, smart-phones and tablets, the safety of our customers is our top priority. We observe all legal and technical requirements for product safety and conformity and expect the same from our suppliers. You undertake to produce and deliver safe development results and products to us. In the event of safety concerns arising, you are to inform us in good time of any potential hazards and take appropriate measures to reduce the risk.

2.3 Antitrust law, economic and trade sanctions

You are to comply with all applicable national and international trade laws and regulations, including but not limited to antitrust, trade control and sanctions regulations.

2.4 Combating bribery and corruption

You are to prohibit and not practice or tolerate corruption, extortion, embezzlement, misappropriation and money laundering in any form. You may not offer or accept bribes or other unlawful inducements (e.g. kickbacks) in business dealings with business partners or public officials. You may not offer any gifts or other benefits to employees of RugGear that could be regarded as a bribe. As a general rule, gifts or hospitality may not be used to unfairly influence a business relationship and may not violate applicable laws or ethical standards.

2.5 Maintaining complete books of account and records

You are to maintain accurate records of all business transactions and expenditures and comply with applicable laws when creating, maintaining, retaining or destroying documents, including electronic documents.

2.6 Conflicts of interest

As our supplier, you are to avoid situations where your company's interests are or may be in conflict with RugGear's business interests.

You are to inform us without delay if you become aware of a conflict of interest, for example, if RugGear employees have shareholdings or voting rights in one of your companies or are otherwise related to one of your companies.

2.7 Protection of tangible and intangible assets

You are to protect RugGear's assets against loss, theft, damage or misappropriation.

By taking appropriate measures, you help to ensure that neither RugGear products nor their components or the corresponding know-how fall into the hands of imitators or other unauthorised third parties. You are to promptly review the relationship with a third party if you receive any indication that you are unintentionally involved in the manufacture or sale of counterfeit products via the third party's activities. RugGear expects suppliers to assist in the investigation and prosecution of activities related to counterfeit products.

You are to obtain our written consent at all times before using RugGear's name or trademarks or our products for promotional purposes.

2.8 Dealings with employees and others

You are to safeguard internationally proclaimed human rights and are not to directly or indirectly use forced labour (including but not limited to modern slavery and human trafficking) or child labour. Similarly, you are not to use primary products produced with the help of such labour.

You are to respect the freedom of association and the right to collective bargaining. If these possibilities are restricted by law, you are to offer suitable alternatives to independent and free association of workers. Workers' representatives shall be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

You are to regard your employees as your most valuable asset, treat them with respect and prohibit all forms of discrimination and unacceptable treatment, such as psychological hardship, sexual and personal harassment and humiliation of persons, for example, on the basis of their ethnic or national origin, religion or belief, gender, sexual orientation, gender identity and/or expression, age, disability, political opinion, maternity or any other characteristic protected by law.

You are to encourage your employees and other involved parties to report concerns or potentially unlawful practices in the workplace and prohibit any retaliation against whistleblowers.

You are to adhere to the minimum wage and working hours in accordance with local laws and ensure compensation for a living wage in accordance with local living conditions. Wage deductions as punitive measures are not permitted. You are to regularly provide your workers with clear and detailed written information about the composition of their remuneration.

You are responsible for a safe and healthy working environment. You are to take the necessary precautions against accidents and detrimental effects on health that may arise in conjunction with the work by setting up and applying appropriate occupational safety systems.

You are to prohibit the unlawful taking of land, forests or waters, the use of which secures the livelihood of persons. You are to refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this damages the health of persons, significantly impairs the natural basis for the production of food or prevents the access of persons to safe drinking water or sanitary facilities.

2.9 Environmental protection and sustainable entrepreneurship

We expect our suppliers to comply with all applicable national and international environmental regulations and standards, and implement an effective and certified system to identify and eliminate potential environmental hazards. Our suppliers are to operate an environmental management system in accordance with ISO 14001 or comparable guidelines to minimise environmental impact and resource consumption.

Where applicable, you are to comply with all applicable laws and regulations and the resulting due diligence requirements regarding the handling of hazardous substances, e.g. restrictions on use and registration or reporting requirements for chemical substances in the product and/or in the production processes, as specified by way of the applicable legal requirements in the respective market.

You are to observe all applicable laws and regulations in force and the resulting duties of care with regard to the disposal of waste. You are to have systems in place to ensure the safe handling, transfer, storage, recycling, reuse or management of waste, air emissions and waste water discharges. All waste, effluent or emissions that may adversely affect human and environmental health must be adequately managed, monitored and cleaned up prior to their release into the environment..

2.10 Conflict minerals

Deposits of mineral resources such as gold or tin can bring economic prosperity to producing countries. However, they can also directly or indirectly contribute to the financing or support of armed groups or cause or promote human rights violations. We want to contribute to the promotion of peace and development instead of conflict via the extraction of and trade in resources. Therefore, we are guided by the relevant OECD Due Diligence Guidelines. We expect the same from our suppliers.

2.11 Data protection

You are to respect the privacy and personal information of all your employees and business partners and appropriately protect their data. When collecting, storing, processing, forwarding and sharing personal information, you are to comply with data protection and information security laws and government regulations.

3. Implementing the Requirements

We expect our suppliers to comply with the requirements listed and identify risks within their supply chains and take appropriate action. In the event of suspected violations, you are required to inform us in good time and, if necessary, regularly about the identified violations and risks as well as the measures taken.

RugGear reserves the right to conduct audits to ensure that you are complying with the laws and requirements of this Code and will take appropriate action with respect to the business relationship if there is cause for concern.

You agree that RugGear may conduct such audits at your business premises during normal business hours following a reasonable prior announcement. You may object to individual audit measures if these would violate compulsory data protection regulations.

We further reserve the right to terminate any relationship with you if you violate laws and requirements of this Code, fail to take steps to remedy such violations or if systematic violations are apparent.

If you have any concerns about unlawful or inappropriate conduct, please contact compliance@ruggear.com.