



MICROPOL

SUPPLIER CODE OF CONDUCT

Introduction

Micropol Fiberoptic is committed to contribute to sustainable development for future generations. This is done by operating in a social, ethical and environmental manner that complies with all local and national laws and regulations in the region in which we do business in. We require that all our suppliers and sub-suppliers (referred to as "Business Partners") act in the same manner and require full compliance with all laws and regulations applicable to your company in those countries in which you do business or provide services.

We respect differences in cultures and legal requirements over our common globe, but Micropol demands that all business activities are conducted in a manner consistent with this Code of Conduct, irrespective of the location of the Business Partner.

This Supplier Code of Conduct outlines the minimum standards expected from all Business partners providing goods or services to our company. We require our business partners to conduct business responsibly, ethically, and in compliance with applicable laws and international standards. Business partners are responsible for ensuring that their employees, agents, suppliers and subcontractors understand and adhere to this Code.

Compliance with legal requirements

Business partners must ensure compliance with all laws, rules and regulations that apply to the business and services performed. The supplier must comply with all applicable laws, rules, regulations, and international guidelines in the countries where they operate.

Labour conditions and human rights

We expect our Business Partners to conduct their business and operations in a way that respects human rights, based on internationally recognized human rights and the UN Guiding Principles on Business and Human Rights, as well as the four fundamental principles of the ILO Core Labor Standards.

All forms of modern slavery, forced and indebted labour, work carried out under threat of punishment or compulsion is unacceptable. Work must take place on a voluntary basis, and personal documents and possessions must not be confiscated in order to force somebody to work.

As a minimum, statutory wages must be paid, and applicable working time legislation must be followed. In addition, we encourage all suppliers to pay living wages to their employees. Wages paid and hours worked must be documented in a transparent system that covers all employees.

Micropol expects the supplier to make decisions on hiring, promotion, development and compensation based on the employees' abilities and skills related to the job. These decisions must never be based on irrelevant factors such as gender, age, ethnic or national origin, religion, disability, sexual orientation, union membership or political affiliation.

Micropol also expects the supplier to respect the right of employees to freely associate and bargain collectively.

All forms of child labour are unacceptable, and documentation certifying the age of all employees must be available. All forms of work that could have a negative impact on the child's right to a healthy childhood and development, or that prevent the child's education, are classed as child labour. All forms of violence, compulsion and exploitation of children are unacceptable. Any person under 18 years of age is to be regarded as a child, in accordance with the definition in the UN Convention on the Rights of the Child.



Counterfeit parts

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective process should be in place to detect counterfeit parts and materials and mark parts obsolete as appropriate. Micropol Fiberoptic expects its suppliers to be able to show that they only buy from OEMs or authorized representatives. If counterfeit parts and/or materials are detected or suspected, Business Partners must provide immediate notification to the recipient of such counterfeit parts and/or materials.

Products for military use and dual-use items.

The supplier must clearly state if any supplied products is for military use or dual-use on the quote/offer presented to Micropol. This shall be done before any products are delivered to Micropol.





Environment

Micropol Fiberoptic expects the supplier to reduce negative environmental impact through a proactive and systematic approach. Operations must be run in a way that systematically prevents severe emissions to air, water or land. This commitment has a great impact on coming generations' right to grow up in healthy environments in the future.

Suppliers must establish, implement and maintain a risk-based approach to reduce or minimize any negative environmental impact from their activities, products and services. Suppliers must take precautionary measures as soon as there is reason to believe that an action could harm the environment or public health and strive to develop and support environmentally friendly techniques in their products, processes, designs and material selection. Preferably the supplier shall work systematically with an environmental management system, such as ISO 14001.

The supplier must fulfil any environmental laws and industry specific standards. Micropol Fiberoptic expects the supplier to identify and phase out hazardous substances in products and operations.

The supplier shall make sure that the supplied products are in compliance with the RoHS directive 2011/65/EU, the REACH regulation 1907/2006/EC, the POPs regulation 850/2004/EC, the Biocidal products regulation 528/2012/EU, the Waste Framework directive 2018/851/EU and EC2008/98 and that information regarding content of Conflict Minerals (3TG) is timely reported to Micropol.

REACH, RoHs and POP certificate shall always be supplied together with products delivered to Micropol.



Quality and Product Compliance

Suppliers must deliver products that meet safety, technical, and quality specifications. The Business partner must maintain quality management systems (preferably ISO 9001); ensure traceability of components; and promptly report safety concerns or non-conformities to the buyer.

All products delivered to Micropol must have a Certificate of conformity assuring that a product meets the required EU, regulatory, safety standards and product requirements.

Export and sanctions

Business Partners are obliged to ensure that their business practices are in accordance with all applicable laws, directives and regulations, including economic sanctions and embargoes, governing the export and transfer of parts, components and technical data and services. Business Partners must provide truthful and accurate information and obtain export licenses and/or consents where necessary.

Adhere to the applicable laws and regulations governing the export, import and retransfer of products, components, software, as well as technical data. Provide truthful and accurate information regarding any restrictions related to their products and services. Comply with all sanction's restrictions applicable directly or indirectly to their business. Not provide Micropol Fiberoptic with any products or services that are, directly or indirectly, subject to sanctions.

Business ethics and anti-corruption

Any kind of corruption or bribery is unacceptable. Documents must not be manipulated. Statutory tax must be paid. Any tax liabilities to public authorities must be settled. We expect its suppliers to run their business in accordance with the national and international legislation in force and to comply with internationally agreed rules on business ethics. Suppliers must not take part in, or tolerate any kind of corruption, bribery, extortion or misappropriation. Suppliers are not to offer or accept any benefits or anything else in order to obtain any improper or inappropriate advantage. Examples of such inappropriate benefits include cash, gifts, leisure travel or benefits of another nature. The supplier must specifically ensure that all payments or other benefits offered or made to public officials, private sector employees or any other party comply with applicable anti-corruption laws and regulations.





Information protection

Micropol Fiberoptic expects the supplier to properly handle sensitive information, including confidential, proprietary and personal information. Information should not be used for any other purpose than for which it was provided. The supplier must respect the intellectual property of Micropol Fiberoptic and others.

Suppliers must protect sensitive data, follow cybersecurity best practices, comply with data protection regulations such as GDPR NIS2, and report data breaches promptly.

Business Partners must report any suspected or actual breach or security incident to Micropol Fiberoptic as soon as they become aware of it, if the data breach/security incident affects the business relationship and or required by laws and regulations.

Confidential information shall always be handled in accordance with Micropol's specific requirements. These requirements are managed in specific agreements together with the business partner.

Conflict of interest

Micropol Fiberoptic expects the supplier to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in its dealings with Micropol Fiberoptic. Micropol Fiberoptic expects the supplier to report to Micropol Fiberoptic any situations of actual or potential conflicts of interest between the personal interests of those involved in the dealings and the interests of Micropol Fiberoptic. The supplier must respect the intellectual property of Micropol Fiberoptic and others.

Financial

We expect our suppliers to accurately and transparently record all financial aspects of their operations, to represent themselves truthfully to the appropriate tax authorities, and to comply with all applicable tax laws. Suppliers are also expected to have effective processes in place to prevent the facilitation of tax evasion by employees or any individuals performing services on their behalf.

We do not make facilitation payments and expect our suppliers not to make such payments - either directly or indirectly - on our behalf. Facilitation payments do not include fees that are legally required, such as filing fees for official documents. They also do not include lawful expediting payments that are clearly outlined in an official, published fee schedule and for which a receipt is issued.

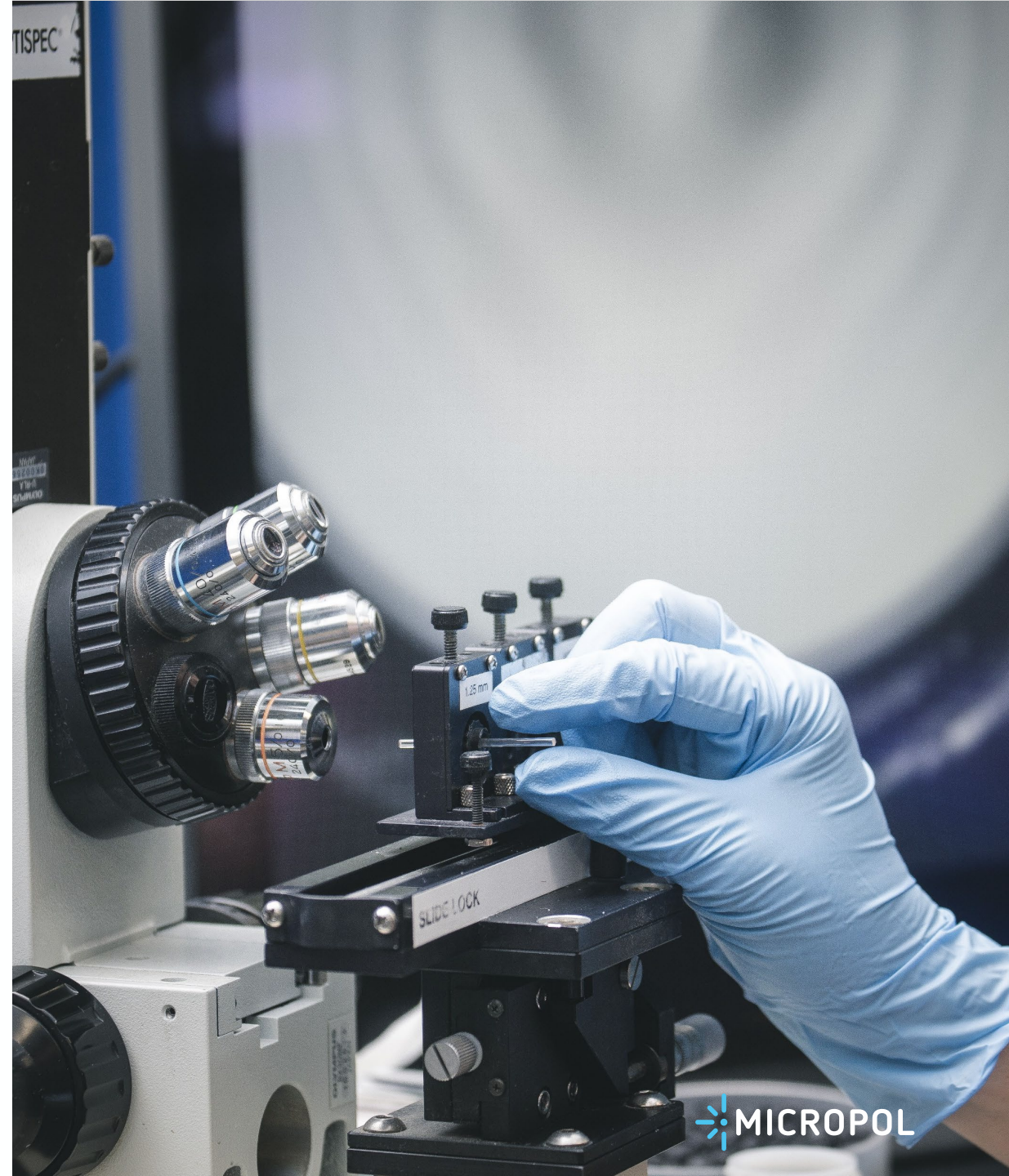
Responsible sourcing of materials

Micropol Fiberoptic expects the supplier, where applicable, to exercise reasonable due diligence concerning its use of conflict minerals and the source of these minerals and to respond in a timely manner to Micropol Fiberoptic's request for information on these activities and findings.

Suppliers must ensure that tin, tungsten, tantalum, gold (3TG) and Cobalt, and other regulated minerals, are sourced responsibly and do not finance armed groups. Suppliers must comply with global regulations including the EU Conflict Minerals Regulation and U.S. Dodd-Frank Section 1502, conduct due diligence per OECD Due Diligence Guidelines, provide documentation, use audited smelters, avoid high-risk sources unless due diligence supports it, ensure sub-supplier compliance, and promptly report risks. Keep full traceability in the complete supply chain to smelter or refiner level. While respecting commercial confidentiality, suppliers must, upon request, report on their 3TG and cobalt supply chain by completing and submitting the Responsible Minerals Initiative's Conflict Minerals Reporting Template (CMRT) and/or Cobalt Reporting Template (CRT)

Health and safety

Suppliers must provide a safe and healthy working environment, identify and mitigate workplace hazards, ensure personal protective equipment and training, maintain emergency preparedness, and follow occupational health and safety standards such as ISO 45001 or equivalent.





Whistle blower Protection

Micropol Fiberoptic expects suppliers to provide a method to the employees with avenues for raising legal or ethical issues or concerns without fear of retaliation and take action to prevent, detect, and correct any retaliatory actions.

If a violation of this Code is suspected, the supplier has a responsibility to report this to Micropol Fiberoptic. Reporting of violations must be done directly to Micropol Fiberoptic either to the relevant contact person at Micropol Fiberoptic or via Micropol Fiberoptic Whistleblowing scheme, <https://micropol.com/en/about-us/whistleblower/>. The whistleblower channel enables all employees, regardless of position or role within the value chain, to report potential violations of the Code safely and anonymously.

We also expect that our suppliers will, upon receiving reasonable notice, give Micropol Fiberoptic access to relevant premises and documentation to verify compliance with this Supplier Code of Conduct.

We the undersigned authorized representative/s of the supplier, hereby certify that the supplier accepts and complies with this Supplier Code.

Date: _____ Place: _____

Company: _____

Signature: _____

Name: _____ Role: _____

