



RAMUDDEN GLOBAL (NORTH AMERICA) INC.

Code of Conduct for Suppliers

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1. INTRODUCTION

At Ramudden (Global) North America Inc. and its subsidiaries, (herein referred to as “**Ramudden Global North America**,” “**we**,” “**us**,” and “**our**”), we recognize that a good product or service alone does not determine the success or failure of a company. It is not the only factor that influences a purchase decision. A bad reputation or lack of reputation of a company endangers its success. Entrepreneurial success therefore requires a “certain extra”, namely the ethical and legally compliant behaviour of all representatives and employees, as well as all business partners and Suppliers (herein referred to as “**Supplier**,” “**you**,” and “**your**”), of Ramudden Global North America.

Acting ethically and in accordance with the law creates trust, credibility, reliability, and reputation. This “certain extra” is also the integrity and personal responsibility of each individual for his or her actions. In less abstract terms, the sum of all these characteristics is Ramudden Global North America's value-based compliance culture. This also determines Ramudden Global North America's business success. Business success is not above law, and business success is not above morality and integrity. The way Ramudden Global North America achieves business success is therefore as important as business success itself.

This Supplier Code of Conduct is the guideline for compliance with laws and ethical principles for Ramudden Global North America's Suppliers. It combines two important aspects: on the one hand, the requirement to comply with all internal and external laws, regulations, and guidelines, and on the other hand, the requirements for ethics and integrity. For Ramudden Global North America, it is both an internal requirement and an external promise. It also ensures that Ramudden Global North America is, and remains, transparent and comprehensible to all. These Ramudden Global North America values are reflected in this Supplier Code of Conduct.

Ramudden Global North America expects and requires all its Suppliers to recognize these values, to take these values as the basis for their own business decisions and to conduct their business according to these values. For this reason, Ramudden Global North America expects its Suppliers to comply with the standards of conduct set out in this Supplier Code of Conduct (“**Code of Conduct**”) and ensures that they are contractually bound to do so.

2. PURPOSE OF THIS CODE OF CONDUCT

Ramudden Global North America expects all its Suppliers to behave and act in accordance with the rules in order to avoid economic damage and harm to Ramudden Global North America's reputation. Any breach of this Code of Conduct may have serious consequences. Wilful misconduct will therefore not be tolerated. Without exception, Ramudden Global North America will sanction any misconduct or violation of laws, other laws and regulations, internal and external policies, rules and procedures, principles, processes, and generally accepted ethical and compliance standards (collec-

tively, the “**Rules**”). In doing so, Ramudden Global North America will not take into account the importance of the Supplier to us.

The Supplier shall ensure that all its representatives, employees, freelancers, own suppliers and consultants (“**Supplier Representatives**”) comply with this Code of Conduct by acting at all times and in all places in accordance with this Code of Conduct and all Rules and by cooperating in full transparency when a (potential) breach of these principles may occur.

This Code of Conduct is the minimum standard for the activities of all Supplier Representatives. In addition, the applicable laws of the country or countries with which a matter, relationship or business activity is associated shall always apply and, to the extent that they conflict or differ, shall prevail over this Code of Conduct.

Compliance with the requirements of this Code of Conduct will be regularly reviewed, e.g., by internal or external auditors. If at any time a (potential) breach of this Code of Conduct is suspected or known, the Supplier shall immediately inform Ramudden Global North America of the (potential) breach and provide all information related thereto. The Supplier is obliged to support Ramudden Global North America as well as to take all own measures necessary to remedy a (potential) breach of this Code of Conduct and/or to prevent such a breach.

3. CARRYING OUT COMPLIANCE AUDITS

The Supplier shall conduct risk analyses and internal reviews on a regular and/or occasional basis to ensure full compliance with this Code of Conduct, revise its own policies, rules and procedures and ensure compliance at all times.

4. RULE CONFORMITY

Ramudden Global North America has a high internal demand for the integrity of its actions and behaviour. Ramudden Global North America and all its Suppliers are obliged to comply with all rules. This principle of compliance with the rules applies explicitly even if Ramudden Global North America and/or one or more Suppliers would gain (alleged) advantages by violating one of the rules.

5. RESPECT FOR HUMAN RIGHTS

Ramudden Global North America supports and respects the protection of international human rights as laid down in the United Nations Declaration of Human Rights and the fundamental conventions of the International Labour Organisation. Ramudden Global North America explicitly rejects child labour, forced labour or labour favoured by human trafficking and makes this a criterion in the selection of its Suppliers and business partners.

Suppliers of Ramudden Global North America shall comply with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* as of the date of its implementation into Canadian law.

6. OCCUPATIONAL HEALTH & SAFETY

Our employees are our most important asset. Therefore, their health and safety are of particular concern to us. For this reason, we expect our Suppliers to ensure exemplary occupational health and safety for their employees and to include occupational health and safety in all their business considerations. Our Suppliers should establish processes that identify risks and develop and implement corrective measures within the framework of these processes. Our Suppliers shall ensure that their workers comply with all applicable occupational health and safety regulations and practices. Accidents, injuries, defective or unsafe equipment and behaviour shall be detected and corrected.

7. FAIR WORKING CONDITIONS, DIVERSITY, ETHICAL STANDARDS

7.1 Working conditions

Ramudden Global North America expects its Supplier to ensure fair working conditions both in its company and with its business partners. Ensure compliance with all applicable legal rules on fair pay, in particular compliance with applicable minimum wages, social security contributions and social benefits, as well as compliance with all applicable laws on working time.

7.2 Social dialogue

Dealing with the interests of employees in a spirit of social partnership (including with the labour unions and trade associations, a co-op which is important to us), we assume that you guarantee freedom of association and collective bargaining.

7.3 Diversity, equality, and inclusion

Ramudden Global North America stands for multicultural, partnership-based cooperation and equal opportunities. Discrimination based on race, ethnic origin, gender, religion, ideology, disability, age, sexual identity or other personal characteristics has no place at Ramudden Global North America or among its Suppliers.

We expect our Suppliers to ensure fair working conditions and to have a zero-tolerance policy towards any discrimination based on any of the above criteria. The Supplier must ensure that it supports diversity, equality and inclusion in relation to all religious, human, idealistic and ethnic aspects, as well as in relation to all sexual identities, sexual orientations, and genders.

7.4 Alcohol and drug abuse

The Supplier shall also ensure a safe, productive, and drug-free working environment. No one shall be under the influence of illegal drugs, excessive alcohol, or other illegal substances on the Supplier's premises.

8. ECOLOGICAL RESPONSIBILITY

Ramudden Global North America strives to implement high standards to meet its environmental responsibility in the conduct of its business. Ramudden Global North America expects the Supplier to fulfil its own ecological responsibility in an appropriate manner. This includes, among other things, the implementation of internal rules and procedures that go beyond mere compliance with legal environmental regulations and protect the environment to the extent that it is economically justifiable for the Supplier, but in any case, to the extent required by law.

9. PROHIBITION OF BRIBERY AND CORRUPTION

Ramudden Global North America does not tolerate unethical business practices such as corruption, bribery and unfair advantage taking. Therefore, Suppliers are not permitted to unduly influence business decisions by granting or accepting improper advantages of any kind. Any undue influence on public officials and/or business partners is strictly prohibited not only for employees but for all persons working or providing services for Ramudden Global North America and/or the Supplier in any form.

The Supplier shall ensure that the policy for accepting, offering, promising, and giving gifts or hospitality is implemented on the basis of generally accepted market standards, which shall be complied with at all times by all its representatives.

10. FAIR AND FREE COMPETITION

We expect our Suppliers to comply with and ensure compliance with the applicable rules of fair competition and antitrust law and that its representatives act accordingly. All measures aimed at an impermissible restriction of competition and/or violating the rules are to be avoided. In principle, agreements between undertakings, decisions by associations of undertakings and concerted practices that have as their object or effect the prevention, restriction or distortion of competition are prohibited.

11. PREVENTION OF MONEY LAUNDERING, TERRORIST FINANCING AND OTHER CRIMINAL ACTS

The Supplier must fully comply with its obligations to prevent money laundering, terrorist financing and other criminal acts. Each Supplier Representative must avoid and be aware of unusual financial transactions. This also applies to cash transactions or indirect transactions conducted through third parties that could give rise to suspicion of money laundering.

The Supplier further represents and warrants that it will comply with any laws, regulations, embargoes, or restrictive measures relating to trade, economic or financial sanctions administered, issued, or enforced by any of the following sanctioning authorities: United Nations Security Council, Can-

ada, European Union, United Kingdom, United States of America and the governments and official institutions or agencies of any of these organisations.

12. COMPLIANCE WITH TAX LAWS

Ramudden Global North America does not tolerate tax evasion or similar legally prohibited activities. The Supplier is strictly prohibited from evading taxes or similar, nor may it assist, support, advise or promote customers, business partners or other third parties in tax evasion or similar legally prohibited activities.

13. BUSINESS AND TRADE SECRETS

Trade secrets and confidential information are important assets of Ramudden Global North America. The Supplier must ensure that it and its Supplier Representatives are obliged to keep non-publicly known information about Ramudden Global North America, its business, and its business partners strictly confidential and protect it from unwanted disclosure. This applies in particular to essential intellectual property and assets such as trade secrets, trademarks, research and copyrights, patents, but also to conditions granted to third parties and the content of data, contracts or documents.

14. CONFLICTS OF INTEREST

The Supplier shall ensure that the professional and private interests of its Supplier Representatives are clearly separated. Conflicts of interest can call into question the integrity and professionalism of the Supplier and thus also of Ramudden Global North America. They must therefore be recognised and avoided at an early stage.

Personal relationships with a business partner, e.g., family members, must not lead to preferential treatment of the business partner and the professional position must not be abused for personal purposes.

15. SUSTAINABLE PROCUREMENT

Sustainability and acting accordingly is also a special concern for us in our supply chain. We expect you to ensure and verify compliance with the guidelines of this Supplier Code of Conduct in your supply chain.

We assume that you not only commit your own suppliers to compliance in writing, but also monitor this through regular and ad hoc audits. The same applies to the obligation of your suppliers to commit their suppliers to compliance with the guidelines of this Supplier Code of Conduct; whereby this obligation is to be passed on from supplier to supplier and compliance with it is to be monitored regularly and on an ad hoc basis.

16. DONATIONS AND SPONSORSHIP

Donations and sponsoring serve the common good and its promotion. We are always aware of our responsibility for this. Our top priority is complete transparency. We also expect this from our Suppliers. Ensure that donations to charitable causes, including those in the area of sport or culture are always made voluntarily and without consideration (i.e. no promise or receipt of payment, goods, services or other things of value in exchange for the donation).

17. ASSET PROTECTION

Each of us is responsible for the protection and resource-conserving handling of assets. Everyone at Ramudden Global North America and its Suppliers has a duty to use Ramudden Global North America assets for legitimate business purposes and to protect them from loss, damage, or unlawful use. Assets must not be removed from the business, unless express authorization has been given.

18. DATA PROTECTION AND INFORMATION SECURITY

The personal data of customers, business partners, and employees of Ramudden Global North America are highly sensitive and must be protected by careful and responsible handling.

The Supplier shall take a variety of technical and organisational measures to ensure the confidentiality of the personal data of Ramudden Global North America and its own employees, own suppliers and other business partners. It is responsible for ensuring a high level of data protection and shall strictly comply with data protection rules and in particular respect and observe the comprehensive rights of those whose data he collects, processes and uses.

19. SOCIAL MEDIA

Social networks offer countless opportunities to communicate with business partners, families, friends, and the public in general. Social media includes social media messenger services (e.g., WhatsApp Messenger, Facebook Messenger, Instagram), blogs, social network websites, wikis, photo/video sharing sites and other chat applications and chat rooms. Electronic messages are permanent records of communications that can have a significant impact on Ramudden Global North America's reputation. Both the Supplier and its representatives must not appear to speak or act in the name of or on behalf of Ramudden Global North America unless they are expressly authorized to do so.

20. ACKNOWLEDGEMENT AND CONSENT OF THE SUPPLIER

By engaging in business with Ramudden Global North America and its subsidiaries, Suppliers agree to:

- Comply with the principles and requirements listed in this Supplier Code of Conduct
- Communicate the contents of this Supplier Code of Conduct to its Supplier Representatives in an understandable manner and to take all necessary precautions for the implementation of its rules.
- Confirm compliance with this Supplier Code of Conduct upon request, and in the manner requested.

This Supplier Code of Conduct may be amended from time to time, and it is the Supplier's obligation to familiarize itself with the most current version.