



## **Code of Conduct**

Throughout our businesses across Europe, the Americas and Asia, Pelsis is committed to the highest standards of ethics and business conduct. We strive to provide a world class service to our worldwide customers by operating in an ethical manner. In abiding by these values we aim to uphold our reputation for being reliable and acting with integrity, respecting the laws, regulations, traditions and cultures of the countries in which our customers, we and our suppliers operate. We pride ourselves on high standards of service and the professional and ethical conduct of all our employees who act on behalf of Pelsis and who are expected to treat compliance to this Code of Conduct as a key element of their daily working lives.

Similarly, our suppliers are responsible for ensuring that their directors, officers, employees, representatives and suppliers understand and comply with the expectations in this Code of Conduct. However, this Code of Conduct is not intended to be all inclusive and suppliers are obliged to ensure appropriate compliance to all applicable laws, regulations, traditions and cultures of the countries in which they and their suppliers operate.

This Code of Conduct applies to all customers, employees and suppliers and sets a minimum standard for expected behaviour and helps to sustain and enhance our joint reputation and contribute to ethical long-term value creation. We expect that Suppliers will support Pelsis with appropriate data and site access plus the provision of additional data, certificates etc. evidencing compliance and take prompt action to correct any non-compliance.

### **Legal Compliance and Business Ethics**

#### **General Compliance**

Pelsis, its customers and suppliers are required to comply with all the laws and regulations of the countries in which they operate. As a minimum this includes compliance with laws prohibiting any form of corruption, bribery, sales or shipments to embargoed countries and the restriction of imports or exports where necessary, as well as any laws concerning the governance of business transactions.

#### **Bribery and Corruption**

Anything which constitutes or creates an unfair or improper business advantage should be avoided. This may even be something which appears to influence someone's business judgement. Bribes may not be offered, promised, demanded, given or accepted in order to gain such an advantage including the provision of excessive or frequent gifts or entertainment.

#### **Anti-bribery and Corruption Policy**

Pelsis requires its trading partners to:

- comply with all applicable laws, statutes, regulations, and codes relating to anti-bribery and anti-corruption including but not limited to the Bribery Act 2010 (the Requirements);
- have and shall maintain in place throughout the term of the Contract its own policies and procedures, including but not limited to adequate procedures under the Bribery Act 2010, to ensure compliance with the Relevant Requirements; and
- promptly report to Pelsis any request or demand for any undue financial or other advantage of any kind received in connection with the performance of a Contract.
- These laws include U.S. federal, state and local anti-corruption laws, the U.S. Foreign Corrupt Practices Act, the Bribery Act 2010 of the United Kingdom and the other anti-corruption and anti-bribery laws of all the countries in which we do business.

#### **Conflicts of Interest**



Employees and trading partners should minimize personal relationships and situations where it will be difficult to apply objectivity. All instances of an actual or apparent conflict of interest must be reported to Pelsis. This includes instances of where personal relationship can impact on a business decision or where an employee or business partner has an ownership or financial interest in Pelsis, a supplier or customer.

### **Legal and Fair Competition**

Pelsis competes aggressively and fairly in its market sectors. We do not collude with our competitors on pricing matters, inventory levels, products, bids or sales agreements. We expect our trading partners to adhere to the same. Pelsis complies with all competition in business transactions and does not engage in any deceptive practices or espionage to get information on our competitors.

### **International Trade**

Pelsis complies with all UK, US and international laws and regulations in its global trade. This covers the export and import of goods and transfer of goods, technologies and services, including both civil and military applications. We accurately report our importing and exporting transactions, seeing Trade Compliance knowledge a fundamental aspect of our business strategy.

### **Quality**

Pelsis focusses on quality to meet our customers' diverse needs including delivering products and services on time, to the correct specification and at the agreed price. To do this we expect our suppliers to comply with all quality control requirements, both dictated by industry governing legislation and via specific customer requirements. Any issue regarding safety should be reported immediately.

### **Integrity**

Integrity is a core of Pelsis. We are committed to conducting business fairly and honestly. All Pelsis employees are expected to act, at all times and in all circumstances, with the highest sense of integrity on behalf of the Company, acting in a manner that protects and enhances the Company's corporate reputation. To this end:

- Pelsis employees shall be 'straightforward and honest in all professional and business relationships.'
- No employee shall engage in personal activities or pursue financial or business interests which might give rise to, or give the appearance of, conflicts of interest with Pelsis, or which might compromise their ability to meet the responsibilities of their job.
- Pelsis does not offer, promise, give, demand or accept bribes or other unethical advantage in order to obtain, retain or give business or other advantage.
- Pelsis employees who have access to privileged information (including proprietary and confidential information, whether belonging to Pelsis or others) must not use it to achieve personal gain for themselves or others.
- Pelsis employees must ensure proper and responsible use of all Pelsis' assets, including physical property, intangible assets, IT equipment and communication resources.

### **Protection of Information & Assets**

Trading partners and employees shall respect intellectual property rights and safeguard their own and third parties' information, including the protection of IT assets from theft or misappropriation. Transfer of intellectual property, technology and know-how will be undertaken in a manner that protects intellectual property rights.

### **Monitoring and Record Keeping**

Trading partners and employees shall have processes to identify, understand, and implement applicable laws including regulations and requirements of this code. All stakeholders shall maintain documents and records to ensure regulatory compliance, and compliance with this code, and will make these available to the relevant parties on request.

### **Workplace**

Pelsis is built upon honesty, integrity and trust and we are committed to ensuring fair employment practices. This includes complying with legislation on all matters of employment including working time, wages,



diversity, equality and prohibiting discrimination. Our statement on modern slavery is available to support this link.

Our facilities are not only safe places to work with compliance to Health Safety and Environment practices, but they encourage team working, innovation and flexibility. Compliance with laws is something we strive to exceed upon, also supported by our wellbeing practices. It is expected that our suppliers operate to the same standards as ourselves and are able to demonstrate good Health Safety and Environmental HSE practices in all of their operations.

Pelsis and our supply chain, from time to time, may come into contact with conflict minerals. It is our expectation that we have controls in place to minimize this requirement and reliance. By focusing on alternative sources we aim to minimize this and our risk to the environment.

## **Corporate Social Responsibility and Ethical Behaviour**

Pelsis is committed to its Corporate Social Responsibility (CSR) policy which refers to our responsibility to the three pillars of sustainability: Economy, Society and the Environment.

As well as the need to reduce our environmental impacts, there is also an expectation from customers and investors to play our part in creating a sustainable business operating in a compliant and ethical way. Pelsis is part of a bigger system of people, values, other organizations and nature and it is important that we partner with suppliers who also operate with similar values and compliance standards covering:

### **Human Rights**

Pelsis maintains the highest respect for the protection and enforcement of human rights. Pelsis, its customers, suppliers and employees are responsible for upholding these values. We do not accept discrimination of any kind and being compliant with modern slavery and human-trafficking law, we will not tolerate compulsory, forced or child labour. Pelsis and our trading partners must comply with all relevant child labour laws and should not employ anyone who is under the age of fifteen or, where it is higher, the mandatory school leaving age in that locality. All employees, stakeholders and trading partners are respected by all Pelsis staff.

Trading partners must make sure that factories and worksites meet our standards in relation to human rights, labour practices and the environment. High risk trading partners may be audited to make sure that the human rights of workers in our supply chain are protected.

### **Anti-Slavery Policy (Modern Slavery Act 2015 or equivalent)**

Pelsis requires its trading partners to warrant and represents that:

- it has not been convicted of any offence involving slavery and human trafficking; nor has it been the subject of any investigation, inquiry or enforcement proceedings regarding any offence or alleged offence of or in connection with slavery and human trafficking; and
- it shall comply at all times with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force from time to time including, without limitation, the Modern Slavery Act 2015.

### **Equal Opportunities Policy**

Pelsis can have an impact on our Supplier's employment decisions and can ensure that the Supplier commits to inclusive employment practices.

### **Health Safety and the Environment**

Pelsis promotes safety and environmental excellence across all facilities and expects the same throughout the supply chain in order to reduce hazards, risks and our environmental footprint. We promote the reporting and proactive investigation of hazards and near misses. We actively reduce the production of and encourage the recycling of waste; whilst also promoting car sharing and cycle to work schemes for our employees. This is communicated throughout the organization in compliance with health, safety and environmental legislation.



### **Conflict minerals**

In accordance with provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, the U.S. Securities and Exchange Commission (“SEC”) has adopted rules that require public companies to provide certain disclosures if any products they manufacture or contract to manufacture contain “Conflict Minerals” that are necessary to the functionality or production of those products.

On 1st January 2021, this also became law in the European Union with the EU Conflict Minerals Regulation. Pelsis supports the objectives of the EU regulation and SEC’s rules and will perform all necessary due diligence in order to avoid the use of 3T&G that have funded armed groups in the DRC region to further the goal of ending the human rights violations in the region.

We expect our trading partners to support our efforts and to take steps to ensure that 3T&G that have funded armed groups are not used in materials supplied to Pelsis.

Please refer to Pelsis Conflict Minerals policy.

### **REACH / RoHS**

- Our trading partners shall, at the earliest opportunity upon becoming aware of their application to Goods provided under a Contract, notify Pelsis of any relevant information in respect of:
- the Registration, Evaluation, Authorization and Restriction of Chemicals Regulations (EC) No 1907/2006 or its successors (the REACH Regulations) including but not limited to the safety data sheet, dates of registration any relevant authorizations and / or restriction, and any relevant changes to the candidate list; and
- The Restriction of Hazardous Substances in Electronic Equipment Directive 2011/65/EU or its successors including Annex II amendment (EU) 2015/863 and other additional amendments (the RoHS Directive).
- Where the Supplier is providing Goods to Pelsis to which the RoHS Directive applies, the Supplier warrants and represents that such goods are compliant with the requirements of the RoHS Directive.
- The Supplier shall promptly provide any further information reasonably requested by Pelsis in relation to the REACH Regulations and the RoHS Directive.

### **Packaging**

Under UK / EU law, manufacturers and suppliers of products must provide detailed information about the product packaging, including its weight, dimensions, component identification, material composition, and recycled content. This requirement is outlined in the Packaging and Packaging Waste Regulations and the EU Packaging and Packaging Waste Directive. The purpose of this requirement is to promote sustainable packaging practices and reduce the environmental impact of packaging waste.

To ensure compliance with the legal requirement you will be asked to provide the packaging information for all the products you supply to Pelsis Ltd.

### **UN Sustainable Development Goals (SDGs)**

- Pelsis’s CSR goals are built from the UN SDGs, as described in our CSR policy.
- Trading partners are expected to set targets and work with us to meet them. These targets include:
- 100% of our packaging will be at least 30% recycled content, recyclable, compostable or biodegradable materials (sourced sustainably by 2026)
- Deforestation-free supply chain by 2030

To understand our supply chains approach to these requirements we have developed the CSR and Ethical Behaviors Questionnaire for suppliers to complete. All suppliers are required to complete the questionnaire annually and based on the responses we may need to implement improvement activities to ensure compliance and to reach our targets.

### **Applicability**



The integrity of Pelsis ultimately depends upon the individual actions of our directors, officers, employees and representatives, all over the world. Each one is personally responsible and accountable for compliance with this Code.

**Code Compliance**

All entities are responsible for ensuring compliance to this Code of Conduct with their directors, officers, employees, representatives and suppliers.