

Code of Conduct for Suppliers and Third-Party Intermediaries

This Code of Conduct is dated _____ (the “Effective Date”)

between;

Company Name: _____ (“Supplier”)

Registered Number: _____

Registered Address: _____

and;

Cogent Technology Ltd (“Cogent”)

Registered Number: 1855453

Registered Address: Langer Road, Felixstowe, Suffolk, IP11 2ER

This agreement supersedes any provision in any Supplier documentation that would purport to undercut the provisions of this agreement.

This Code of Conduct defines the basic requirements placed on suppliers and third-party intermediaries of Cogent Technology concerning their responsibilities towards their stakeholders and the environment. Cogent Technology reserves the right to reasonably change the requirements of this Code of Conduct in line with legislation and/or business practices. In such an event, Cogent Technology considers any revised versions of this Code of Conduct to be accepted and without requiring formal acknowledgement from the supplier. Cogent Technology is entitled to conduct inspections in order to verify compliance with this Code of Conduct.

The supplier and/or third-party intermediary declare herewith to:

Human Rights

- Respect the protection of internationally proclaimed human rights and avoid complicity with human rights abuses.

Non-discrimination

- Refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, which is sexual, coercive, threatening, abusive or exploitative.
- Promote equal opportunities and treatment of employees, irrespective of skin colour, race, nationality, ethnicity, political affiliation, social background, disabilities, sexual orientation, marital status, religious conviction, gender or age.

Respect for Cultures & Communities

- Help foster economic and social development of local communities and ensure full respect for human rights, dignity, aspirations, culture, and natural resource-based livelihoods in areas in which operations are made.

Fair Operating Practices

Legal Compliance

- Comply with the laws of the applicable legal systems.

Anti-corruption and bribery

- Maintain zero tolerance for any form of corruption, extortion or bribery.
- Forego directly or indirectly offering or granting and requesting or accepting anything of value to government officials or to a counterparty in the private sector with intentions to influence official action or obtain an improper advantage.
- Act in accordance with national and international competition laws and refrain from participating in price fixing, market or customer allocation, market sharing or bid rigging with competitors.
- Avoid all conflicts of interest that may adversely influence business relationships.

Fair Treatment and Supply Chain

- Respect the intellectual property rights of others.
- Notify and promote, using reasonable efforts, among its suppliers compliance with this Code of Conduct.
- Comply with the principles of non-discrimination with regard to supplier selection and treatment.

Employment Practices

Prohibition of Forced Labour

- Avoid all forms of forced and compulsory labour and refuse to employ or make anyone work against their will.

Prohibition of Child Labour

- Employ no workers under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development (reference: ILO Convention 138(7)).

Occupational Health & Safety

- Act in accordance with the applicable statutory and international standards regarding occupational health and safety and provide safe working conditions.
- Establish a reasonable occupational health & safety management system.
- Provide training to ensure employees are educated in health & safety issues and have the right to refuse unsafe work.

Basic Human Rights, Working Hours, Wages & Benefits of employees.

- Respect the personal dignity, privacy and rights of each individual.
- Comply with the maximum number of working hours outlined in the applicable laws.
- Provide fair remuneration and guarantee the applicable national statutory minimum wage.
- Recognise, as far as legally possible, the right of free association and collective bargaining. Neither favour nor discriminate against members of employee organisations or trade unions.

Information Protection

Maintain Accurate Records

- Create accurate records and not alter any record entry to conceal or misrepresent the underlying transaction represented by it.
- Retain records based on the applicable retention requirements.

Intellectual Property

- Comply with all applicable laws governing intellectual property rights, including protection against disclosure, patents, copyrights and trademarks.

Information Security

- Have a robust Information Security Management System (ISMS) to manage business partner information.
- Have a set of Information Security Policies in place (e.g., password policy, antivirus, device authentication etc) and ensure employees are trained accordingly.
- Protect the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures.
- Comply with applicable data privacy laws.

Environmental Protection

- Act in accordance with the applicable statutory and international standards regarding the environment.
- Establish a reasonable environmental management system.

Conflict Minerals

- Make reasonable efforts to avoid in its products the use of raw materials, which directly or indirectly finance armed groups who violate human rights.

1.0 Signatures

The parties have approved this Code of Conduct to be executed, as of the “Effective Date”, for and on behalf of;

Supplier:
Print Name:
Title:
Signature:
Date:

Cogent Technology Ltd
Print Name:
Title:
Signature:
Date:

END OF DOCUMENT