



ATS Display Sp. z o.o.

Supplier Code of Conduct

Wiązowna, 28.04.2022 r.

ATS Display Sp. z o.o. is committed to complying with the highest legal, ethical and moral standards as set out in our Code of Conduct, Environmental Policy and Policy against corruption and bribery.

Business ethics and Corporate Social Responsibility (CSR) are our priorities in all aspects of our operations, including our dealings with suppliers, recognising that they are key stakeholders in the success of our business. We apply uniform standards in our assessment of the ethical conduct of both our employees and third parties. We expect the suppliers to share our aspirations in providing the best possible service, in a manner focused on quality and respecting the core values of responsible business.

We choose to select only those Suppliers who, like us, meet our standards in respecting human rights, caring for the welfare of the environment, respecting labour rights and preventing corruption. Our Suppliers undertake to comply with all applicable laws in all areas of their business. Where such regulations do not exist, the principles contained in this code should be used as a guideline. Along with compliance with the law, ATS Display Sp. z o.o. Suppliers are expected to conduct themselves in accordance with high standards of business ethics. This Supplier Code of Conduct is intended to define the basis for sustainable development and to reinforce high standards of integrity both within our organisation and in our business relations with contractors. We have also defined the tools with which we will enforce compliance with our standards as well as with applicable laws and regulations (including international law). In return, we strive to be an honest and reliable partner, firmly believing that relationships based on trust and honesty will be sustainable and beneficial to all.

Requirements to be met by the Supplier

We expect you to adhere to the standards in the following areas:

OCCUPATIONAL HEALTH AND SAFETY

- Complying with all applicable occupational health and safety legislation (minimum necessary).
- Having procedures in place and employing staff to monitor on an ongoing basis the compliance of the workplace with standards and regulations related to health and safety at work, as well as to prevent and record occupational accidents or diseases.
- Providing employees with at least necessary level of health and safety knowledge.

PEOPLE AND COMMUNITY

- Fair terms and conditions of employment - in particular such as refraining from discrimination based on gender, age, ethnicity, nationality, religion, disability, trade union membership, political affiliation or sexual orientation.
- Respect for the workers' right to freedom of association or collective bargaining.
- Fair remuneration of employees as well as compliance with legal provisions on remuneration.
- Ensuring that working hours (including overtime) do not violate applicable legal requirements.
- Enable employees to freely terminate their employment relationship in accordance with applicable legislation.
- Banning all forms of modern slavery, including bond labour, forced or compulsory labour, child labour.
- Not employing persons under 15 years of age, unless permitted by local legislation and the exception in question must be in accordance with International Labour Organisation guidelines.

- Respect for the dignity, privacy and rights of each individual.
- Eliminating behaviour (including gestures, language and physical contact) of a sexual nature.
- Preventing and not allowing coercion, threats, insults and exploitation.

THE ENVIRONMENT AND CLIMATE CHANGE

- Compliance with all applicable environmental legislation (minimum necessary).
- Fostering a proactive approach to environmental challenges, including:
 - optimising energy use and applying energy-efficient technologies,
 - using resources in an efficient manner,
 - taking measures to minimise environmental pollution,
 - monitor and minimise other environmental risks if they arise from the Supplier's activities,
 - reducing impacts on biodiversity and climate change,
 - to consciously manage and recycle waste,
 - exercising due diligence in the selection of raw materials used and their suppliers, so that they do not come from conflict areas that could directly or indirectly contribute to the financing of groups that violate human rights, use forced or slave labour, or traffic in human beings.

CORPORATE GOVERNANCE AND COMPLIANCE WITH REGULATIONS

- Not to participate in or tolerate any form of unethical business behavior such as bribery and corruption to influence official or business activities or to obtain undue benefits. All payments, gifts or other benefits of the Supplier to customers, government officials or other parties must comply with applicable anti-corruption laws.
- Compliance with the concepts, principles and recommendations of national and international competition law and the guidelines of the Organization for Economic Cooperation and Development (OECD) for multinational enterprises, including but not limited to:
 - all relevant anti-corruption legislation with regards to the relationship with ATS Display Ltd.
 - USA and EU trade sanctions requirements;
 - general EU data protection laws and requirements;
 - all relevant anti-money laundering legislation.
- Not to participate jointly with competitors in price-fixing, market or customer allocation or tender rigging.
- To keep confidential any information concerning ATS Display Sp. z o.o. or its business partners that has not previously been made public.
- To respect the intellectual property of both ATS Display Sp. z o.o. and its business partners. To purchase goods and services in a responsible manner, ensuring that the provisions of this Code are observed in the supply chain to the fullest extent possible.
- Paying all due taxes in connection with transactions carried out for the Company, including in particular value added tax.
- Issuing invoices to ATS Display Sp. z o.o. in a reliable and compliant manner.
- Purchasing goods and services from entities guaranteeing that VAT shown on invoices will be shown and paid in accordance with applicable tax law.

Method of Supplier verification

In order to verify that our Suppliers are performing at the level we expect, we use the methods depending on:

- the risks and legal requirements associated with what we buy,
- the country of origin of the goods and services purchased and the risks involved;
- the level of expenditure.

ATS Display Sp. z o.o. may limit, suspend or terminate its relationship with Suppliers who violate the Code provisions or refuse to participate in our expected corrective action plan.

We will regularly inform our suppliers of the principles contained in the Code. Our verification processes may include one or more of the following methods:

- direct communication and acceptance of the Supplier;
- specific clauses in the contract;
- completion of the Supplier Code of Conduct questionnaire;
- audit / assessment / inspection by ATS Display Sp. z o.o., or a third party;
- corrective action plans;

The process of any audit will be agreed in advance between the parties to demonstrate compliance and to ensure transparency. Only by adhering to high standards of ethics and corporate social responsibility will we maintain our excellent reputation and ensure our continued success together. We will continually monitor the operation of the Code and make further improvements to it where we believe it can improve the way we conduct our business.

Raising and Reporting the Concerns

This Supplier Code of Conduct contains general requirements that apply to all ATS Display Sp. z o.o. Suppliers. In case of discrepancies between the law and the Code, then the law shall prevail. We also expect our Suppliers to have similar requirements at an earlier stage of the supply chain and to exercise due diligence in verifying their own Suppliers for compliance.

Suppliers are required to inform ATS Display Sp. z o.o. about any cases of violations of the provisions of the Code, including those committed by ATS Display Sp. z o.o. employees, in accordance with the "Procedure for reporting internal violations of the law and protection of whistleblowers at ATS Display Sp. z o.o." Reports should be submitted by selecting one of the permitted forms: in writing, orally or electronically. Written reports should be sent to: ATS Display Sp. z o.o., ul. Boryszewska 22C, 05-462 Wiązowna, with the note "in person - Irregularities Coordinator". Electronic reports should be sent to: sygnalisci@atsdisplay.com. Persons who prefer oral reports can arrange a conversation with the Irregularities Coordinator, ensuring full confidentiality, by contacting ATS Display Sp. z o.o. ensures that all reports will be handled confidentially and in accordance with applicable laws. We guarantee protection to all our employees, customers, suppliers or other external stakeholders for those who report concerns about unethical, improper or illegal conduct by ensuring that reports are treated confidentially and that those who report will not be exposed to any retaliatory action.

Additional information

Additional advice and information relating to our Code of Conduct, Policy against corruption and bribery, Environmental Policy and Supplier Code of Conduct is available at www.atsdisplay.com