

It is proseat's belief that how we operate as a Company, and as individuals, is based on the principle of doing the right thing. This leads our customers and business partners to do business with us, our shareholders to invest in us, our external stakeholders to respect us, and the best talent to join us in working for proseat.

This Supplier Sustainability Policy identifies the global standards to be followed in your business activities on behalf of proseat. Suppliers are expected to share proseat's commitment to these standards.

Code of Conduct and Ethics

proseat conducts business with integrity and in compliance with all applicable laws and regulations. A commitment to integrity is critical to how we conduct business and maintain our outstanding reputation in the communities in which we do business. Suppliers are expected to understand and comply with proseat's Code of Conduct and Ethics, and demonstrate the highest standard of integrity and ethical conduct in all business activities.

Legal Compliance

proseat is committed to complying with all applicable legal requirements. Suppliers are expected to comply with all applicable legal requirements and prevent incidents or conditions that might result in a violation of law. All purchased materials used in manufacture of goods shall satisfy current governmental and safety constraints on restricted, toxic and hazardous materials as well as environmental, electrical and electromagnetic considerations applicable to the country of manufacture and sale. All suppliers must be in compliance with ISO 14001, ISO 9001 under consideration with IATF 16949 or their successors, as amended from time to time.

Human Rights

proseat is committed to recognizing human rights and labor principles throughout its organization and supply chain. proseat considers employees to be one of the most important resources and is committed to the treatment of all employees with dignity and respect. All suppliers are required to comply with local laws governing the employment relationship.

Women's rights

proseat's suppliers will respect the principle that women are entitled to political, economic and social equality. The guidance for this approach is the "Convention on the elimination of all forms of discrimination against women".

Child Labor

proseat's suppliers will not use child labor. The term child refers to children under the legal age for employment in any location.

Forced Labor, Human Trafficking

proseat believes that all employees should have the right to voluntarily select whether to be employed by the supplier. The supplier will not use forced or involuntary labor of any kind or tolerate physically abusive disciplinary practices.

Diversity, equity and inclusion

proseat's suppliers will develop and promote inclusive cultures where diversity is valued, celebrated and everyone is able to contribute fully and reach their full potential. Suppliers should encourage diversity in all levels of their workforce and leadership, including boards of directors.

Rights of minorities and indigenous peoples

proseat's suppliers will show respect for the rights of local communities to decent living conditions, education, employment, social activities, and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups.

Wages and Hours, Working Conditions

Suppliers must comply with all applicable wage and hour laws, including minimum wage, overtime, maximum hour rules, meal and rest periods, and to provide legally mandated benefits. Where local industry standards exceed applicable legal requirements, suppliers are encouraged to provide wages and ensure working conditions that meet the higher local industry standards.

Privacy and Data Protection

proseat expects its suppliers to respect for privacy for all employees and other participants in the business process. proseat expects that the content of the General Data Protection Regulation (EU 2016/679) will be included in the internal management documentation of the suppliers and that it will be implemented in full. All information and documents from previous, current or future projects are to be assessed as customer property and accordingly protected from unauthorized access. The unauthorized disclosure of protected information of any kind is prohibited.

Coercion, Harassment and Discipline

proseat expects its suppliers to treat their employees with dignity and respect. Suppliers are expected to have systems in place to prevent, detect, and resolve unacceptable worker treatment such as harassment, inappropriate use of discipline, discrimination, physical or mental punishment, or other forms of intimidation or abuse (e.g., physical abuse, threat of abuse, sexual or other harassment, verbal abuse, any type of corporal punishment, or other forms of mental and/or physical coercion as a form of discipline).

Discrimination

proseat is committed to providing all employees with a professional working environment which is free from unlawful forms of discrimination and harassment. Suppliers must make all employment decisions based on the facts and individual merit. Suppliers shall not discriminate in their hiring and employment practices (e.g., pay/promotion) and must follow all employment laws.

Freedom of Association and Collective Bargaining

Suppliers must respect their employees' right to choose to join or not to join a trade union, or to have recognized employee representation in accordance with local law. Suppliers are expected to maintain constructive dialogue and negotiate in good faith with such representatives. Suppliers shall not harass, discriminate against, or otherwise penalize workers, worker representatives, or trade union members because of their interest and/or membership in, or affiliation with, a trade union, or their legitimate trade union activity, in accordance with international labor standards.

Preventing Bribery and Corruption

proseat is committed to conducting business ethically throughout the world. proseat prohibits suppliers from giving or promising to give anything of value to employees or representatives of foreign governments, governmental agencies, political parties, or to political candidates, for the purpose of obtaining or retaining business. Suppliers must conduct business with integrity and in full compliance with all applicable laws.

Private or public security forces

proseat's suppliers should commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

Complaint Process and Retaliation Protection

proseat expects its suppliers to implement a complaint procedure that includes all relevant business processes and that guarantees the complainant every protection against retaliation ("whistleblower policy").

Fair Competition and Antitrust Law

proseat expects all those involved in the business process to submit to the regulations of antitrust law and international agreements on fair competition.

Conflict of Interests

proseat requires that employees of its suppliers avoid any conflict between their own interests and the interests of their company in dealing with suppliers, customers and other third parties. It is also a conflict of interest for an employee during or subsequent to employment and without proper authority to give or make available to anyone or use for his/her own benefit information of a confidential nature derived from his/her employment.

Financial responsibility (accurate records)

Suppliers commit to a company's responsibility to accurately record, maintain and report business documentation including, but not limited to, financial accounts, quality reports, time records, expense reports and submissions to customers or regulatory authorities, when appropriate. Books and records are expected to be maintained in accordance with applicable law and generally accepted accounting principles.

Disclosure of information

proseat's suppliers commit to a company's responsibility to disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices and, when applicable, disclose information regarding labor force, health and safety practices, environmental practices, business activities, financial situation and performance.

Counterfeit parts

Suppliers will fulfill the requirement for companies 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. Business partners are also expected to establish effective processes to detect counterfeit parts and materials and, if detected, quarantine

the materials and notify the Original Equipment Manufacturer (OEM) customer and/or law enforcement as appropriate. Finally, companies are expected to confirm that any sales to non-OEM customers are compliant with local laws and those products sold will be used in a lawful manner.

Intellectual property

proseat's suppliers are requested to protect creations of the mind, such as inventions; literary and artistic works; designs; and symbols, names and images used in commerce. It is protected in law by, for example, patents, copyright and trademarks, which enable people to earn recognition or financial benefit from what they invent or create.

Export controls and economic sanctions

Suppliers will respect the restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.

Environmental, Health & Safety

proseat is committed to complying with all applicable environmental, health and safety legal requirements and protecting the environment. Suppliers are expected to comply with all applicable environmental, health and safety legal requirements and prevent incidents or conditions that might result in a violation of law or otherwise endanger the environment.

Suppliers must provide each employee with a safe and healthful work environment. Each supplier has responsibility for maintaining a safe and healthy workplace for all employees by following health and safety rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions as stated in the Environmental, Health and Safety Policy.

Environmental Sustainability

proseat adopts the definition for Sustainability as "meeting the needs of the present without compromising the ability of future generations to meet their own needs." For proseat, this means being aware of our impacts and understanding how these affect the world around us. Our mission is to reduce these impacts while increasing the profitability and longevity of our company.

Environmental Sustainability (continued)

proseat expects its suppliers to support proseat's sustainability mission by complying with all applicable environmental laws, rules and regulations while using resources wisely. Suppliers are expected to share proseat's commitments by developing and implementing a sustainability program focused on using natural resources responsibly, reducing water usage, reducing waste generation,

preventing air pollution, improving energy efficiency and reducing the carbon footprint of their operations. proseat expects its suppliers to implement a responsible chemical management in regards of purchasing, usage and handling.

Decarbonisation

proseat's suppliers undertake to contribute to the reduce of GHG emissions from a company's value chain.

Reuse and recycling

Suppliers will establish processes to use existing materials or products as they are to reduce waste whilst recycling refers turning a product into a raw material that can be used again.

Biodiversity, land use and deforestation

proseat's suppliers will be active to the maintenance of ecosystems so that flora and fauna are not lost and natural habitats do not suffer irreparable damage. As part of the European Union's Green Deal plans to protect ecosystems and biodiversity, the European Commission has proposed a new law to halt deforestation and minimize the EU's impact on forests worldwide. The proposed law will require companies that sell commodities linked to deforestation and forest degradation (e.g. leather) to ensure they are 'deforestation-free' before placing them on the European market or exporting them from the EU.

Land, forest and water rights and forced eviction

Suppliers commit to the avoidance of forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

Soil quality

Suppliers will determine the condition of the soil in their area of responsibility and establish measures to maintain and improve soil quality.

Noise emissions

proseat's suppliers will determine the release of noise into the environment from various sources that can be grouped in: transportation activities, industrial activities and daily normal activities. They will establish measures to improve noise emissions.

Preventing the Flow of Funds to Armed Groups and Conflicts

proseat strives to use only components with raw materials where extraction, transport, trade, processing and export are obtained from validated sources as a matter of principle, wherever practicable. We ask our suppliers to source responsibly and endeavor to understand that sourcing of their materials neither directly nor indirectly provides funding to conflicts and human rights abuses. (Conflict Minerals)

Animal Welfare

proseat upholds the highest standards for ethical behavior. With respect to animal welfare, we require compliance with all legal requirements and, as applicable, we expect our suppliers to implement industry-best policies and practices related to the ethical treatment of animals. proseat commits to a belief in the humane treatment of animals, including freedom from thirst and hunger, freedom from discomfort, pain, injury and disease, freedom to express normal behavior, and freedom from fear and distress.

Implementation of Sustainability Standards in the Supply Chain

proseat expects its suppliers and all subcontractors to abide by the requirements of this Supplier Sustainability Policy, including identifying risks within their supply chains and taking appropriate measures to address them. proseat's suppliers shall implement sustainability requirements for their own supply base following the content of this policy. It is agreed that all proseat suppliers will find out about the sustainability requirements on the website of the project-related OEM, and that they observe and implement them.

Right to Audit and Ensure Compliance

proseat reserves the right to conduct audits to ensure compliance with these requirements and also reserves the right to take appropriate measures, including discontinuing any relationship with a supplier should the supplier violate, fail to correct, or have a pattern of violating this Policy. proseat reserves also the right to send out questionnaires regarding the Supplier Sustainability Requirements and to establish a rating system that can have an impact on the awarding process.