



CODE OF CONDUCT FOR SUPPLIERS



MESSAGE FROM THE CEO

Dear partners,

Through rigorous and sustained efforts, our company has managed to grow continuously. As COMPA business continues to grow, we need to keep up with the challenges of new developments in line with COMPA principles. Our Code of Business Conduct explains how we apply our policies and how we act as employers, employees, managers, executives to meet the priority interests of the company and its shareholders, customers and employees, the community and the environment. This Supplier Code of Conduct explains how COMPA expects all its Suppliers to apply the same principles and concepts.

In all our endeavors we act with integrity and honesty to maintain the company's credibility and strong reputation and to continue to focus on the responsibility to succeed in our actions. For this reason, this Code of Conduct sets out a number of expectations that COMPA has from its Suppliers throughout the supply chain.

This Code of Business Conduct and COMPA principles apply to each entity, individual or organization that is related to our actions. This Code is a guide to how we ask Suppliers to act in business, in a socially and ethically responsible manner, identical to how COMPA governs all of its relationships.

We respect the law, we support universal human rights and environmental protection, in order to obtain operational excellence and the benefit of the community in which we work, having the same expectations from the Suppliers we work with.

Sincerely,

Ioan DEAC

Chairman of the Board of Directors and General Manager

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INTRODUCTION



Conducting work at an ethical level is a key element for COMPA. In light of this, we have compiled this Supplier Code of Conduct to coordinate our expectations with those of our partners, including in the areas of activity with which we have a permanent partnership.

This Supplier Code of Conduct (“SCC”) sets out COMPA's expectations of Suppliers and other partners with whom COMPA collaborates (including affiliates - subcontractors hereinafter collectively referred to as “Suppliers”) regarding sound and responsible ethical, social practices, labor and environmental relations.

COMPA recognizes that at the international level there are differences in the legislative and cultural environment in the areas where Suppliers operate. Beyond this, the „SCC” sets out the minimum requirements that Suppliers must meet, or ensures that these requirements are consistent with their own business principles, in relation to COMPA. Therefore, Suppliers are expected to communicate the principles of this code or a similar own code throughout the supply chain.

In order to maintain the absolute priority of this approach, COMPA reserves the right to carry out the controls it reasonably deems necessary to ensure that this Code is complied with throughout its supply chain. This control may include self-assessments, COMPA audits and third-party suppliers' audits.

COMPA understands that Suppliers may need time to resolve issues for which they do not meet the compliance criteria, and considers that the level of compliance can best be achieved through a process of continuous improvement over a period of time, which includes dialogue with COMPA. To this end, COMPA has developed the Supplier Code of Conduct which aims to provide Providers with information on how to implement these principles and meet these requirements. COMPA will continuously inform all Suppliers of the actions and improvement plans adopted regarding the „SCC” and awaits evidence that the minimum requirements are met or even exceeded by its supply chain partners.

COMPA encourages its Suppliers to support the achievement of the objectives set by adherence to ISO 45001 and ISO 14001, as well as the adoption of the United Nations Practices and Objectives for Sustainable Development - <https://www.un.org/sustainabledevelopment/>

COMPA also calls on all its Suppliers to comply with a number of principles and requirements in the field of quality, environment and occupational health and safety by adhering to and implementing policies and regulations that address the following issues:

- REACH 1907/2006 (Registration, Evaluation and Authorization of Chemicals) - <https://echa.europa.eu/legislation>
- CLP 1272/2008 (Classification, Labeling and Packaging of substances and mixtures) - <https://echa.europa.eu/legislation>
- Conflict Minerals - <https://ec.europa.eu/trade/policy/in-focus/conflict-minerals-regulation/>
- other applicable requirements.



1. INTEGRITY IN BUSINESS

COMPA has assumed the highest standards of business integrity. It does not tolerate any practice that is not based on honesty, integrity and fairness.

COMPA seeks to identify those Suppliers that operate according to the same ethical standards as its own. COMPA's ethical standards are contained in the Code of Business Conduct, which provides, among others:

- ☆ Compliance with all applicable legislation
- ☆ Fair treatment, with dignity and respect
- ☆ Carefully and accurately prepare all records and financial transactions
- ☆ Honesty and promptness in reporting financial conditions and operating results
- ☆ Honesty and fairness in relations with customers, buyers, suppliers and financial partners
- ☆ Avoid receiving and / or granting undue benefits
- ☆ Protection of COMPA goods and of Suppliers / customers
- ☆ Protection of the ownership and confidentiality of information
- ☆ Protecting COMPA's reputation
- ☆ Separation of personal political activities from COMPA activities
- ☆ Reporting violations of applicable laws and regulations, as well as ethical standards.
- ☆ Suppliers will not engage in any unfair competition or bribery in any form, as described in the „SCC“.
- ☆ COMPA's requirements to its Suppliers are:
 - Not to engage in acts of unfair competition
 - Not to conclude express or tacit agreements with competitors regarding the tariffs applied or the conditions for conducting business
 - Not to enter into agreements with competitors regarding market or customer sharing
 - Not to get involved in acts of taking and / or bribery
 - Not to accept or grant valuables intended to affect the decisions or opinions of an employee or to influence the decisions or opinions of others.
 - Not to accept gifts or attentions and / or from customers / Suppliers or potential customers / Suppliers in exchange for commercial benefits and / or preferential rates or any other economic advantages;
 - Suppliers will establish and maintain business integrity policies. This may include a specific general business integrity policy and / or distinct policies covering various business integrity issues, such as anti-bribery policy;
 - Suppliers will implement ethical measures regarding the conduct of activities



2. HUMAN RIGHTS AND FUNDAMENTAL RIGHTS AT WORK

- ☆ COMPA is committed to respecting human rights. We will implement this commitment by implementing and strengthening practices and procedures to prevent, mitigate and, where appropriate, remedy the negative impact on human rights that has arisen as a direct result of our work or that may be directly related to our work. through the relationships we have with Suppliers. Our commitment as well as implementation practices and procedures are in line with international instruments, including the Universal Declaration of Human Rights, the ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights -<https://www.unglobalcompact.org/>



- ☆ We expect our Suppliers to operate in a manner that demonstrates respect for human rights, in accordance with the principles below, and to take all reasonable steps to address human rights risks in our own Supply Chain and elsewhere. of the business.

2.1 ELIMINATION OF ALL FORCES OF FORCED OR COMPULSORY LABOR

- ☆ Suppliers will not use slavery, forced labor or any other form of involuntary forced labor.
- ☆ Providers must ensure that the work is performed voluntarily, in exchange for compensation in accordance with the law, and is not the result of sanctions or prosecutions, or of threat, violence, detention, withholding of identity documents, revocation of legal rights or restriction of privileges.
- ☆ They will demonstrate that there is a policy in place that prohibits forced or compulsory labor and is known to all managers and workers.
- ☆ Workers must be free to consent to the employment and termination of employment at any time, with reasonable notice in accordance with applicable law, the collective bargaining agreement and the operational constraints.
- ☆ Providers must not allow forced labor as a result of a debt, which refers to the offering of loans or salary advances granted by the employer or recruitment firms, in exchange for a commitment from the employee to perform the work by himself or a member. of the family in order to pay them.
- ☆ Suppliers will not have activities that involve forced labor, including:
 - compulsory, involuntary work in prison (excludes here the activities organized in penitentiaries as part of the official and human programs for the training of convicts in order to be employed after the date of release).
 - forced labor as a result of acts of threat or application of criminal penalties or acts of violence or withholding of identity documents or restriction of liberty, non-payment of wages or as a result of loss of rights or privileges.
- ☆ They shall ensure that all employees are informed in writing of the terms and conditions of employment and that they comply with the company's policies regarding the termination of employment contracts, the issuance of notice of discharge and the granting of loans and salary advances.
- ☆ It will ensure that employees are employed directly and in a transparent manner or only through recruitment firms that have developed and implemented policies and strategies to combat labor and forced labor and that do not require future employees to pay commissions in return. guaranteeing employment.
- ☆ Respects the legal periods of remuneration and guarantees the payment of salaries for the entire period worked by employees.



2.2 WORK IN PENITENTIARY

- ☆ It will be ensured that the employment and use of prison work is done in accordance with and exclusively on the basis of approved rehabilitation programs for detainees, that this does not have the effect or intention of entering into unfair competition or replacing local labor or lowering standards. affecting the access of employees or other persons to the labor market or prejudicing fundamental rights at work.
- ☆ They will ensure that the work performed by detainees is productive and managed in accordance with legal and quality standards;
- ☆ They will ensure that the employment clauses and conditions provide a reasonable work schedule, fair remuneration and access to transparent and equitable labor dispute resolution processes.

- ☆ They shall ensure that all necessary measures are taken to ensure that detained employees have full and free access to remuneration for activities performed during the period of incarceration or after the date of release.

2.3 EFFECTIVE ABOLITION OF CHILD LABOR

- ☆ Providers must not allow the work of workers who have not met the legal age requirement in any local country or jurisdiction in which the Supplier operates for COMPA. If the minimum age of employment is not defined, it will be 16 years. Regarding the minimum age, in cases where minors are allowed to work, Providers must comply with all legal requirements, in particular those relating to working time, pay, education and working conditions.



- ☆ Providers will set and respect clear age limits for work, limits that can be mentally, physically, socially or morally dangerous for young workers. Young workers are defined as those workers who are older than the minimum age mentioned above and are under the age of 18.

2.4 MINIMUM AGE

- ☆ Providers will demonstrate that mandatory policies and procedures regarding the legal minimum age of employment have been developed and applied and that they have been communicated to both workers and managers;
- ☆ They will ensure that if the minimum age of employment has not been specified, it will be 16 years;
- ☆ They will ensure that it is possible to communicate the age of the youngest workers employed now or in the past.
- ☆ They will establish a procedure which, in accordance with the legislation in force at local level, will offer special protections and restrictions regarding night shifts, dangerous working conditions, the use of dangerous substances that may adversely affect mental and physical development, spiritual, moral or social development of young employees;
- ☆ They will ensure that if young workers are employed, they have been assigned work norms equal to or less than 8 hours / day / shift and that the shifts do not interfere with their compulsory education and training program.

2.5 ELIMINATION OF DISCRIMINATION REGARDING THE EMPLOYMENT AND PRACTICE OF THE PROFESSION

- ☆ Suppliers will not discriminate against employees in employment, promotion, pay, performance appraisal or in connection with any other term or working condition, based on race, color, nationality, sex, gender identity, sexual orientation, religion, disability. Suppliers will not discriminate on any other criteria prohibited by applicable law.



- ☆ They will demonstrate the existence of policies and practices that ensure that employees are employed on the basis of criteria designed to highlight their ability and competencies to perform the specific tasks of the positions held (eg skills, abilities, experience, etc.) and not on the basis of personal characteristics. such as race, ethnicity, sex or other aspects, or on the basis of subjective requirements intended to affect or exclude certain masses of persons. They will demonstrate that managers are trained to adhere to these policies.

- ☆ They will apply and comply with a written anti-discrimination policy. Managers are trained to follow this policy.
- ☆ It will be ensured that employees have equal opportunities in terms of promotion, training, benefits, overtime, termination of employment and retirement on the basis of skills and not on the basis of personal characteristics and beliefs (principle applicable especially in the case of migrant workers, of both sexes).
- ☆ It will be ensured that employees are not remunerated differently depending on certain characteristics (principle applicable especially in the case of migrant workers, of both sexes).
- ☆ They will ensure that certain facilities are provided at the workplace that can meet the needs of certain groups of people (such as pregnant employees, people with disabilities and people who belong to certain forms of expression of religious beliefs), as long as those facilities do not compromise occupational health and safety standards.
- ☆ They will ensure that parental leave is granted without the risk of losing their job or the responsibility assumed by the employee - parent, according to the laws and regulations in force. There will have to be a clear policy and procedure that complies with the applicable provisions and laws.
- ☆ It will be ensured that the employees have adequate means at their disposal to express their concerns or to file complaints regarding possible acts of discrimination, without there being the risk of sanctioning the respective employees. They will also ensure that there are sufficient resources to analyze those complaints and remedy the problems identified.

2.6 FREEDOM OF ASSOCIATION AND EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING



☆ Suppliers will respect the right of employees to join or not, to a union of their choice and the right to collective bargaining, without any form of retaliation, intimidation or harassment. Employees will not be subject to intimidation or harassment in the exercise of their right to join or refrain from joining any work organization.

☆ They will demonstrate the existence of policies and practices that guarantee that employees can freely associate at work in accordance with the legislation and regulations in force.

☆ They will ensure that the employees' representatives are elected freely, without the interference of the management, and that they are recognized by the management according to the laws in force.

- ☆ They will allow the employees' representatives to carry out legal activities regarding the rights and interests of the employees, without any interference from the management.
- ☆ It will be ensured that the employees' representatives have the freedom to work in accordance with the laws and regulations in force.
- ☆ They will prohibit any acts of discrimination based on affiliation to and / or support for or opposition to trade unions.
- ☆ They will organize regular consultations with recognized trade unions or other legal representatives of employees, if such representatives exist, on issues of common interest such as working conditions, remuneration, conflict resolution at work and internal relations, in accordance with the law applicable.
- ☆ They will cooperate within the legal framework of the state in which they operate in order to ensure that freedom of association and collective bargaining rights are respected.

2.7 SALARIES AND BENEFITS



☆ Suppliers will ensure the payment of the minimum wage in accordance with the legislation in force. If the legislation in force does not establish a minimum wage, the Suppliers will pay the lowest salary that prevails in the market, for the respective position.

☆ Providers must ensure that overtime is paid in accordance with applicable law, employees are not required to work overtime to ensure their minimum wage and they receive all benefits and insurance required by law.

2.7.1 MINIMUM WAGE AND OVERTIME

- ☆ It will be ensured that all standard working hours of employees are paid at / or above the minimum wage in the economy or at a salary agreed by both parties.
- ☆ They will ensure that workers are paid for overtime according to law.

2.7.2 BENEFITS

- ☆ They shall ensure that related benefits are provided where required by law, the individual employment contract or the collective labor agreement.
- ☆ They will ensure that the benefits are granted or paid within the legal deadlines.

2.7.3 PAYROLL

- ☆ They will keep complete and accurate records of payment statements.
- ☆ They will communicate to employees the salaries, incentive systems, benefits and bonuses to which employees are entitled under the law in a language understood by all employees.
- ☆ They will provide employees with a salary scale that will include standard hours and overtime, as well as income and deductions for standard and overtime.
- ☆ They shall ensure that salaries are paid correctly, periodically, on the mentioned date, without delays, in accordance with local laws or with the provisions of individual employment contracts or collective labor agreements.

2.7.4 DEDUCTIONS

- ☆ They will ensure that the instruments are made available and that they are provided free of charge (excluding uniforms, ID cards, stocks of instruments, etc., if they are provided for by the local regulations in force).
- ☆ They will ensure that all deductions applied to employees' salaries comply with all laws and legal restrictions.

2.8 WORKING TIME

- ☆ Suppliers must comply with all applicable laws and regulations regarding employees' working hours, including the maximum number of hours allowed and requirements for breaks. Employers should not require employees to work beyond the legal overtime limit, except in cases of emergencies or permitted by law depending on the nature of the activity.

2.8.1 POLICIES AND PRACTICES

- ☆ They will demonstrate the existence of policies and practices that define normal working hours, overtime, rules and manner of compensation, paid and unpaid rest time and lunch breaks.

- ☆ They will ensure that no employee is allowed to exceed the maximum number of hours allowed by applicable law.
- ☆ It will be ensured that all employees who work overtime will be remunerated according to the legislation.

2.8.2 WORK SCHEDULE

- ☆ They will monitor and keep complete and correct records of the normal and overtime hours worked by employees.
- ☆ They will ensure that a process has been developed and implemented to establish, identify and control employees' work schedules (standard working hours and overtime). The records will include the start and end times of the activity as well as the standard working hours and overtime hours performed by each employee.



2.8.3 OVERTIME

- ☆ They shall ensure the existence of authorizations or exceptions from overtime, where required by law, and that such authorizations or exceptions are correct, current and valid.
- ☆ They will ensure that all managers and employees are informed both of the national laws and regulations in force and of the company's policies and procedures regarding working hours, overtime and holidays.



☆ They shall ensure that overtime does not exceed the standard limits applicable in the location and in the respective field of activity, or which are imposed by the legislation in force, whichever is lower.

☆ It will be ensured that overtime is required only if this is absolutely necessary to respond to increased demands or to certain exceptional situations.

☆ They shall ensure that overtime does not exceed legal limits, does not endanger occupational safety or the safety and

health of employees and conditions the continuation or employment of vulnerable workers or is not part of normal practice to suppress the basic hourly rate or number of employees.

- ☆ They will ensure that employees are not required to work overtime to exceed the minimum wage.

2.8.4 BREAKS

- ☆ They will ensure that the employees benefit from reasonable and adequate breaks for lunch and rest given the nature of the activity and the duration of the working day and that they comply with the legal requirements.



2.8.5 REST DAYS

- ☆ They will ensure that the rest days are offered according to the requirements of the law and that the managers / supervisors know the legal limits.

2.9 HEALTH AND SAFETY



☆ Health and safety are an integral part of COMPA's mission to improve the quality of life. COMPA makes sustained efforts to achieve an organizational culture of occupational health and safety and performance in this field. The commitment of our Suppliers is essential for the continuous improvement and achievement of this goal.

☆ Suppliers will ensure a safe and healthy workplace and working conditions. Health, safety and other workplace standards must comply with at least all applicable legal requirements.

- ☆ Providers will implement and maintain, at their own expense, methods of compensation in the event of employee accidents (such as accident insurance), in accordance with applicable law, for all employees providing services or products to COMPA.
- ☆ They will ensure the existence of a written policy on Occupational Health and Safety.
- ☆ They will ensure that all production centers apply and adhere to a well-documented program in the field of Occupational Health and Safety.
- ☆ They will make every effort to implement an Occupational Safety and Health management system, which will enable them to comply with internationally recognized standards, such as ISO 45001.
- ☆ They will ensure that if there have been breaches of the Occupational Safety and Health policy that have resulted in the application of pecuniary and / or non-pecuniary sanctions, an appropriate action plan has been implemented.
- ☆ They will develop and implement a process to identify and ensure compliance with applicable laws and regulations applicable to the activities of the company.
- ☆ They will develop a process to define OSH goals and objectives but also to monitor performance.
- ☆ They will develop a process to encourage employees to report injuries at work and acquired occupational diseases and to establish all the causes that caused the incident that resulted in personal injury or the acquisition of an occupational disease.
- ☆ They will develop a process to ensure that OSH responsibilities are clearly defined within society.
- ☆ Ensure that all work areas are well lit with natural and / or artificial light and that an adequate temperature is maintained to protect employees from any occupational diseases or accidents at work.
- ☆ They will ensure that all employees have access to drinking water sources.
- ☆ They shall ensure that, if the enclosure is provided with a canteen, it is provided with sufficient chairs and tables for workers and that hygienic accessories and sources of drinking water are available.
- ☆ It will be ensured that all workplaces are provided with sufficient toilets that allow the privacy of workers.



2.10 LIVING CONDITIONS

- ☆ Providers will ensure accommodation conditions, where applicable, at the same health and safety standards as those applicable at the workplace.
- ☆ Providers will ensure living conditions that respect the dignity and right to privacy of employees.
- ☆ They shall ensure that all dormitories comply with all applicable laws and regulations governing these accommodation facilities;
- ☆ They shall ensure that, to the extent possible, when dormitory buildings are located in locations other than the location of the workplace, they provide transport to and from the workplace.
- ☆ They will ensure that the accommodation facilities (dormitories) offer, at least, access to clean toilets, to drinking water sources, to food preparation facilities.

2.11 DISCIPLINARY PRACTICES



☆ Suppliers will treat every employee with dignity. They will not apply or threaten the application of corporal punishment or any other form of physical, sexual, psychological or verbal abuse or harassment of any employee.

☆ Providers will implement a clear disciplinary procedure that prohibits violence, harassment or physical or emotional intimidation in any form, and will communicate it in a language understood by employees.

☆ They will ensure that there is a written and approved disciplinary procedure that complies with local legal regulations;

- ☆ They shall ensure that written records of the disciplinary actions applied and recorded in the files are kept.
- ☆ They shall ensure that all managers and supervisors receive appropriate training on disciplinary practice, that records of such training are kept and that managers observe compliance with these practices.
- ☆ They will ensure that workplaces are protected from any acts of sexual, psychological, physical, verbal harassment and / or acts of abuse and intimidation.
- ☆ Ensure that workplace safety practices are gender-appropriate and non-intrusive, ensure that the specific needs of employees are taken into account and do not interfere with human dignity and employee privacy.

3. ENVIRONMENTAL PROTECTION

- ☆ We request our suppliers to implement an environmental management system according to the ISO 14001 model, obtaining certification in this regard and to act for the continuous improvement of environmental protection measures.
- ☆ Suppliers will comply with all applicable environmental laws and regulations.
- ☆ Suppliers will act to support, protect and restore the environment, through means such as: energy conservation, recycling and controlled disposal of waste, water resources management, and by restoring the environment.
- ☆ In order to obtain a chain of suppliers oriented towards environmental protection, COMPA Suppliers must request, in their turn, their own Suppliers to have a similar approach, implementing, in their turn, the orientation towards ecological procurement.
- ☆ We consider that a particularly important aspect for the protection of the environment is the proper management and management of chemicals and hazardous waste, our Suppliers must comply with legal requirements in this regard.
- ☆ COMPA requires its Suppliers to provide information on the products supplied, such as the content of elements and chemicals, the composition of the products and the quantity and hazardous effects of the elements and chemicals contained, compliance with REACH 1907/2006 (Regulation, Evaluation and Authorization of Chemicals) and CLP 1272/2008 (Classification, Labeling and Packaging of substances and mixtures), safety data sheets and warranty periods for chemicals and substances. This requirement must be passed on throughout the supply chain.
- ☆ All COMPA Suppliers must comply with relevant laws and regulations. They must not have been sanctioned / penalized by law enforcement for non-compliance with the legislation or the occurrence of incidents that have significantly affected the environment.



- ☆ We recommend our suppliers to promote voluntary activities for the protection of the environment, biodiversity, the natural environment, the conservation of energy and non-recoverable natural resources, reducing the amount of waste generated by their organization and improving the means of transport of materials and products.
- ☆ At the request of COMPA, Suppliers must provide the necessary environmental information. If the information provided is confidential, COMPA must be informed in advance so that the information transmitted is treated properly.
- ☆ COMPA calls for the reduction and efficiency of packaging for products to be delivered to COMPA, especially the use of recyclable packaging, the use of substitutes for disposable wooden pallets, and the implementation of the design and use of environmentally friendly packaging.

3.1 ENVIRONMENTAL MANAGEMENT SYSTEM



- ☆ They will ensure the existence of a written environmental management policy.
- ☆ Ensure that all production centers implement a well-documented environmental management program that covers at least the following aspects: environmental protection, pollution prevention, compliance with environmental legislation, continuous improvement and sustainable procurement.
- ☆ They will take all necessary measures to develop and implement an environmental management system that will allow them to comply with internationally recognized standards, such as ISO 14001.
- ☆ They will ensure that, in the last three years, there have been violations

of environmental legislation that have resulted in the application of pecuniary and / or non-pecuniary sanctions, and that an appropriate action plan has been developed and implemented.

3.2 HAZARDOUS WASTE MANAGEMENT

- ☆ Suppliers must:
 - Keep clear records of all waste generated at each location;
 - Store waste in a separate area, completely separate from the storage area of new materials;
 - Have appropriate permits and authorizations for waste disposal, if required;
 - Treat hazardous waste before disposing of it in the environment or disposing of it in a specially designed place;
 - Had proof that they had contracted and worked with companies specialized in taking over, disposing and recycling waste.
- ☆ They will ensure that all centers perform annual wastewater testing and that the results obtained fall within the legal limits.



3.3 NOXES (ATOMOSPHERIC POLLUTION)

- ☆ Ensure that exhaust systems are used efficiently in the event of activities that result in the emission of vapors and / or chemicals.
- ☆ They shall ensure that all centers perform annual air tests to measure the level of emissions and that they may provide samples and evidence proving compliance with the legal limits.
- ☆ They will document the carbon footprint (emissions) for each product / process production line they have.



- ☆ They will have a Carbon footprint database issued by each machine / production line for all processes / products.
- ☆ They will send annually to COMPA a balance with the Carbon footprint generated with an impact on the products supplied to COMPA.

3.4 SOUND POLLUTION

- ☆ They will ensure that noises are managed in accordance with all legal requirements
- ☆ They shall ensure that high-risk areas are properly identified and that personnel operating in these areas are provided with special protective equipment.

4. INCLUSIVE SUPPLY CHAIN

- ☆ COMPA expects its Suppliers to demonstrate a diverse workforce structure that actively encompasses a diversity of the workforce in terms of age, gender, race, ethnic or national origin, religion, language, political beliefs, sexual orientation, physical ability, and to promote inclusion in their own supply chains.
- ☆ Suppliers will ensure that they will be able to present at least once every 12 months, the diversity and inclusion plan and actions that have been developed and implemented as well as the progress made in terms of activity.
- ☆ Suppliers will ensure that they are able to present, at least once every 12 months, a package of actions taken to promote inclusion among key partners in the distribution chain.



5. REPORTING

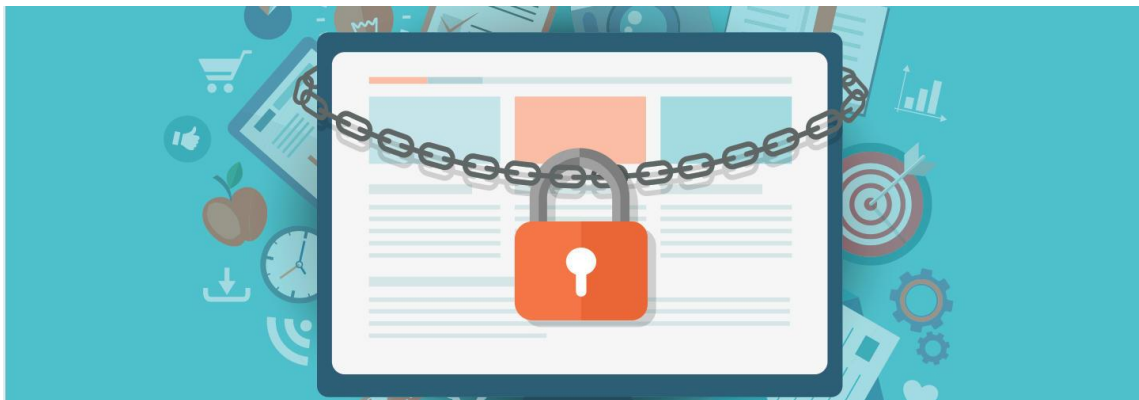
- ☆ Providers must ensure the correct and timely reporting of information reasonably requested to COMPA to enable compliance with all applicable laws and regulations regarding the provision or disclosure of information requested by any relevant governmental body, institution or organization.
- ☆ They will comply with all applicable local reporting criteria and will promptly notify COMPA of any violations of applicable law that have a material adverse effect on COMPA's business and / or any violations of the principles set forth in this Code of Conduct.

6. INFORMATION PROTECTION AND DATA CONFIDENTIALITY



- ☆ COMPA is committed to protecting the confidential information of all business partners, including Suppliers, customers and employees, by ensuring that this information is used in full compliance with applicable law and COMPA's own policies.

- ☆ Supplier must comply with all relevant laws and regulations governing the ownership of the information and protect all information received from COMPA by ensuring that this information is used only for authorized purposes, distributed only to authorized persons and is maintained properly and securely.
- ☆ Suppliers who have access to such information or any other information that is determined to be confidential or personally identifiable information should consult with the COMPA business representative to whom they provide the products or services regarding any questions regarding the proper use of COMPA property information.
- ☆ They will protect confidential information belonging to COMPA and will not disclose it to third parties unless they have previously obtained the express authorization of COMPA in this regard and only in certain situations permitted and legally agreed (for example to the extent that disclosure of information is required by a court decision). Confidential information will include, but is not limited to, all information and data, regardless of their nature and whether communicated verbally, in writing or by any other means and relating to trade secrets, know-how, research , developments, technical and commercial specifications related to products, services, methods and processes, Suppliers,
- ☆ They will ensure that the confidentiality of all personal data they process is kept confidential and also that all persons authorized to process this information have assumed and respect the obligation to maintain confidentiality.



6.1 PROTECTION OF DATA AND PRIVACY

- ☆ COMPA is committed to protecting the personal information, within reasonable expectations, of all business partners, including Suppliers, Customers and other persons or organizations, by ensuring that this information is used in full compliance with applicable law and its own policies and only in business relationship with COMPA.
- ☆ Providers must comply with all relevant laws and regulations governing information security and the right to privacy, as well as COMPA policies in this regard, when personal information is collected, stored, processed, communicated, transferred and / or shared.
- ☆ They will comply with all applicable laws regarding the protection and security of personal data and confidential information as well as COMPA policies and recommendations regarding the confidentiality and security of such data.
- ☆ They will be able to apply appropriate technical and organizational security measures to protect confidential information against any accidental or unlawful loss, damage, disclosure and unauthorized access.
- ☆ They will notify COMPA of any breach of these policies within the time limits agreed with COMPA or if there are no such deadlines as soon as possible.

7. FREE EXPRESSION AND SUBMISSION OF COMPLAINTS



☆ They will ensure that clear complaints and grievance mechanisms have been adopted in all workplaces and that these mechanisms allow employees to bring any complaint or grievance to the attention of management without fear of retaliation or negative repercussions. If possible, employees will have several channels to file these complaints.

☆ They will ensure that these mechanisms are legitimate, accessible, predictable, fair, transparent, that they are continuous sources of information, that they are based on commitments and

constructive dialogue in the spirit of respect for human rights. Particular attention will be paid to the wishes expressed by groups with special needs, such as immigrant employees.

☆ They will ensure that all complaints and grievances are investigated and resolved.

☆ They will periodically evaluate complaint and grievance procedures to ensure that they are credible, accessible and effective.

8. IMPACT IN THE COMMUNITY

☆ COMPA is actively involved in the community to which it belongs, with a history of over 130 years, COMPA has been permanently present in the consciousness of the community of which it is part and which it constantly supports in various ways:

- Providing the technical and technological support necessary for professional and specialized training in pre-university and university education.
- Supporting sports competitions: cycling, race-car, cross, etc.
- Contributions to the provision of resources for projects in the field of public health, culture and cults.

☆ COMPA encourages Suppliers to take similar actions to support the communities they belong to through sustainable actions with a beneficial and sustainable impact on these communities.



9. IMPLEMENTATION AND COMMUNICATION OF THE GUIDE

- ☆ Suppliers will take the necessary measures to ensure that the principles of this code are communicated to their employees and at the level of supply chains. Suppliers will also take appropriate measures to ensure that the principles of this Code or a similar own code are adopted and applied by their Suppliers, agents and contractors, to the extent applicable.
- ☆ Suppliers will establish procedures and mechanisms through which employees can make known issues of interest, without fear of retaliation or negative repercussions.
- ☆ COMPA reserves the right to carry out the checks it deems necessary to ensure that this Code is complied with at the level of its supply chain. This may include self-assessments, COMPA audits and audits of third-party suppliers.
- ☆ In the near future, requirements will be required for the reporting of relevant actions taken by a supplier, both in its own operations and in its own supply chain.
It is COMPA's policy to include the principles of this code in any agreement between a supplier and COMPA.
- ☆ They will communicate all policies and procedures in a language understood by all employees, in accordance with applicable laws and regulations.
- ☆ They will ensure that Suppliers are informed of the requirements set out in the COMPA Supplier Code of Conduct or similar.
- ☆ They will ask all their own Suppliers to sign either the COMPA Supplier Code of Conduct or their own Supplier Code of Conduct, if any.
- ☆ They shall take all appropriate measures to ensure that COMPA suppliers comply with the principles set out in this Code of Conduct.
- ☆ They will notify COMPA if there are changes to the practices initially established and communicated (change in occupational health and safety policies, environmental policies, social policies, as well as changes in the regulations on the use of Minerals in Conflict Areas and the REACH, CLP, IMDS, GADSL agreements, etc.
- ☆ They will communicate annually to COMPA the CO2 footprint resulting from the production of components / assemblies / products intended for COMPA, as well as the proposed plan to reduce this footprint.
- ☆ They will consult and implement the COMPA Code of Conduct or their own, similar.
- ☆ They will consult and implement COMPA's green procurement policy or its own, similar.
- ☆ This Code will be updated periodically to maintain its relevance, based on suggestions from internal and external stakeholders.

