

## Supplier Code of Conduct

Last updated: February 29, 2024

### 1. INTRODUCTION

1.1 Ligentia (being Ligentia Group Holdings Limited, together with its subsidiaries and affiliates) is a solution-focused global logistics supply chain provider, founded on the principles of professionalism, partnerships, and strong systems. We are committed to the highest standards of ethics and integrity and social and environmental responsibility.

1.2 These core principles are reflected in this Supplier Code of Conduct (Code), which establishes the minimum standards that must be met by any business or entity that supplies products or services to Ligentia.

### 2. WHO MUST COMPLY WITH THIS CODE

2.1 We require that all suppliers, agents, service providers, intermediaries, business partners, external consultants, advisors, or entities contracted or engaged by Ligentia (Suppliers) conduct their business activities in accordance with this Code and all applicable laws and regulations.

2.2 Suppliers must also ensure that their own suppliers, agents, and subcontractors who are involved in their supply chain (Associates) must meet the standards set out in this Code as a minimum.

2.3 If there is a conflict between any applicable laws, statutes or regulations, the agreement between the parties, and this Code, Suppliers shall meet the most stringent standard.

### 3. PEOPLE

#### 3.1 Slavery, Human Trafficking and Forced Labour.

(a) Suppliers shall take appropriate steps to identify and eradicate modern slavery, in all its forms, including slavery, servitude, forced and compulsory labour and human trafficking, whether of adults or children, all forms of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

(b) Suppliers shall comply with all applicable anti-slavery and human trafficking laws, statutes, and regulations from time to time in force in any part of their supply chain. This includes, but is not limited to, not supporting, or engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour, or prison labour.

(c) Suppliers shall implement appropriate due diligence practices and provide training to identify the risk of and/or actual instances of modern slavery.

(d) Suppliers shall document all the steps taken to tackle modern slavery and shall, on request, provide a report to Ligentia setting out all policies and procedures implemented, including due diligence undertaken, risk areas identified, how risks have been mitigated, training provided and consequences for third parties of noncompliance.

(e) Suppliers shall ensure that, within their own organisations and throughout the supply chain:

(i) child labour shall not be used and applicable laws, statutes and regulations pertaining to minimum working age legislation shall be strictly complied with;

(ii) forced labour, in any form, shall not be used and supplier workers shall not be required to lodge papers or deposits on starting work; and

(iii) physical abuse, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation or inhumane practice shall not take place, whether as part of a disciplinary process or otherwise, and shall be prohibited. Suppliers shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations, and codes from time to time in force in any part of their supply chain. This includes, but is not limited to, not supporting, or engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour, or prison labour.

3.2 Human Rights. Suppliers shall comply with all internationally recognised human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work from time to time in force in any part of their supply chain.

3.3 Working Environment. Suppliers shall provide a safe, healthy, and sanitary working environment and comply with all applicable health and safety laws, statutes and regulations and any other relevant laws, statutes, and regulations where they operate.

3.4 Wages and remuneration. Suppliers must compensate all workers directly by providing wages either directly to an individual or into their designated account, including overtime premiums, and benefits that at a minimum meet the higher of:

(a) minimum wage and benefits established by applicable laws, statutes, and regulations;

(b) collective agreements;

(c) industry standards; and

(d) wages sufficient to cover basic living requirements.

#### 4. THE ENVIRONMENT

Suppliers shall operate their business in an environmentally responsible way and ensure that:

- (a) Their operations comply with all applicable environmental laws, including laws and international treaties relating to (but not limited to) climate change, waste disposal, emissions, discharges, and hazardous and toxic material handling;
- (b) goods manufactured (including the inputs, components, and production processes incorporated into goods) comply with all environmental laws and treaties; and
- (c) they will only use packaging materials that comply with all applicable environmental laws, statutes, regulations, and treaties.

## 5. FINANCIAL CRIME (INCLUDING BRIBERY & CORRUPTION)

5.1 Suppliers must maintain the highest ethical standards and shall comply with all applicable laws, statutes, and regulations from time to time in force relating to the prevention of bribery, corruption, money laundering, terrorist financing, tax evasion and the failure to prevent the criminal facilitation of tax evasion (Financial Crime) and shall not do or omit to do anything which would cause Ligentia to be in breach of such applicable laws, statutes, and regulations.

5.2 To that end, Suppliers shall not accept, offer, promise, pay, permit, or authorise:

- (a) bribes, facilitation payments, kickbacks, or illegal political contributions;
- (b) money, goods, services, gifts entertainment, employment, contracts, or other things of value, to obtain or retain an advantage; or
- (c) any other unlawful or improper payments or benefits.

## 6. UNFAIR BUSINESS PRACTICES

Suppliers shall comply with all applicable competition laws including but not limited to those relating to teaming and information sharing with competitors, price fixing, and rigging bids.

## 7. SOURCING AND MANAGING OF ASSOCIATES

7.1 Suppliers shall carry out appropriate due diligence of their prospective Associates that will form part of Ligentia's supply chain. As a minimum, the due diligence should include the following:

- (a) investigations into prospective suppliers' stance, public statements, compliance with applicable laws, statutes and regulations and other actions on human rights, treatment of workers, bribery, ethical behaviour, and the environment; and
- (b) risk assessments for countries from which services, materials, components, or finished goods are sourced.

7.2 When dealing with Associates, Suppliers shall monitor that Associates are complying with applicable provisions of this Code.

## 8. SELF-MONITORING, PROOF OF COMPLIANCE & AUDIT

8.1 Suppliers shall monitor their compliance with the Code and shall report any violations (actual or suspected) of this Code as soon as possible to the applicable Ligentia entity that they are working with as follows:

- (a) Ligentia USA: Head of Finance – Riley Smith (riley.smith@ligentia.global).
- (b) Ligentia UK: Finance Director – Andrew Barnes (andrew.barnes@ligentia.global).
- (c) Ligentia Germany: Finance Director – Pawel Gizicki (pawel.gizicki@ligentia.global).
- (d) Ligentia Netherlands: Finance Director – Pawel Gizicki (pawel.gizicki@ligentia.global).
- (e) Ligentia Poland: Finance Director – Pawel Gizicki (pawel.gizicki@ligentia.global).
- (f) Ligentia Australia: APAC Finance Director – Joe Olsen (joe.olsen@ligentia.global).
- (g) Ligentia Asia (China, Hong Kong, Vietnam): Regional Financial Controller – Daisy Tong (daisy.tong@ligentia.global).
- (h) Ligentia India: Finance Controller – Savinay Parab (savinay.parab@ligentia.global).

8.2 Suppliers shall provide any certifications that are required to demonstrate compliance with this Code and all applicable laws, statutes, and regulations within 30 days of a written request from Ligentia.

8.3 Suppliers shall not retaliate or take disciplinary action against any employee or associate that has, in good faith, reported violations of this Code or questionable conduct, or who has sought advice regarding this Code.

8.4 Suppliers shall provide written confirmation to Ligentia that they can comply with this Code for the duration of their relationship with Ligentia.

8.5 In addition, Ligentia may conduct audits to verify Suppliers' compliance with this Code. Ligentia has no obligation to conduct such audits.

## 9. MODIFYING THIS CODE

Ligentia has the right to modify this Code from time to time.

