



SUPPLIER CODE OF CONDUCT

PIONEERS IN RUGGED MOBILE

2021

Bullitt Group Ltd.

One Valpy, Valpy Street Reading,
RG1 1AR, Berkshire, United Kingdom



BULLITT

INTRODUCTION

Bullitt invites its supply chain to join taking responsibility and improving the way of doing business. Bullitt is a member of the Responsible Business Alliance, it supports the United Nations Global Compact, and it works towards the United Nations Sustainable Development Goals, addressing the world's most significant challenges.

This Supplier Code of Conduct sets out the standards of behaviour that Bullitt expects its Suppliers to meet in the context of labour and human rights, health and safety, environment, business ethics and information security. Bullitt reserves the right to introduce additional requirements and updates to this Supplier Code of Conduct.

Suppliers – any individual or entity that supplies services or products to Bullitt – must read and understand these standards and communicate, both within its own organisation and to its suppliers, to ensure compliance within Bullitt's entire supply chain. It is our Suppliers' responsibility to acquire the necessary knowledge for implementation.

Suppliers' ability to meet the requirements of this Supplier Code of Conduct will be considered by Bullitt when making procurement decisions, as Bullitt requires adherence to this Supplier Code of Conduct regardless of whether this Supplier Code of Conduct has been formally incorporated into a contract with the Supplier.

In case of material breach of this Supplier Code of Conduct, Bullitt may require Suppliers to take additional steps to restore compliance, including the allocation of additional resources by Suppliers at Suppliers' cost. Failure of timely rectification may result in termination of Suppliers' business relationship with Bullitt.

02 REPORTING OF MISCONDUCT

It is important to Bullitt that any stakeholders in its business can report concerns about illegal, unethical, or improper conduct. Bullitt has dedicated a website for its anonymous and confidential whistleblowing service, where employees, customers and suppliers may report any concerns without fear of reprisal.

The whistleblowing service and the procedure are accessible here: visit www.bullitt-group.com/ethics or send an email to ethics@bullitt-group.com

03 COMPLY WITH THE LAW

Suppliers must comply with the law in the countries where they operate in and with the law referenced in the agreement between Supplier and Bullitt.

04 LABOUR

At Bullitt, we support and respect human rights in line with the ten principles of the UN Global Compact, the respective declarations of the International Labour Organization's standards and the RBA Code of Conduct.

4.1 FREELY CHOSEN EMPLOYMENT

Suppliers must not use any form of forced, bonded, compulsory labour, slavery, or human trafficking in any part of their business operations. All workers must be provided with a written employment agreement in their native language. Only voluntary work is permitted, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per the worker's contract.

Suppliers must not require workers to surrender any government issued identification, passport or work permit or other personal document as a condition of employment. Workers shall not be required to pay employers' or agents' recruitment or any other fees for their employment.

4.2 YOUNG WORKERS

Suppliers must not use any form of child labour. The minimum age for employment or work is the higher of 15 years of age, or the minimum age for employment in the relevant country, or the age for completing compulsory education in the relevant country. Legitimate workplace learning programs, which comply with all laws and regulations, or light work - as defined by the ILO - are supported. Suppliers must not employ children under the age of 18 for any hazardous work or work that may jeopardise their health and safety, including night shifts and overtime. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

4.3 WORKING HOURS

Suppliers must not require workers to exceed the maximum working hours set by local law. Furthermore, in line with International Labour Organisation (ILO) standards, Suppliers must not require workers to work more than 60 hours per week including overtime, except in extraordinary business circumstances with their consent. Workers must be allowed at least one day off every seven days.

4.4 WAGES AND BENEFITS

Suppliers must pay compensation to workers for the work completed in compliance with local laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Suppliers must provide workers with wage statements that sufficiently inform workers and verify accurate compensation. Suppliers must not deduct compensations as a disciplinary measure.

4.5 HUMANE TREATMENT

Suppliers must implement and communicate disciplinary policies and procedures to support the elimination of harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers, or the threat of any such treatment

4.6 NON-DISCRIMINATION / NON-HARASSMENT

In line with ILO Discrimination Convention, Suppliers must not engage in discrimination or harassment based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered

veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. In addition, Suppliers must provide reasonable accommodation for religious practices.

Suppliers must not subject workers or potential workers to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

4.7 FREEDOM OF ASSOCIATION

Suppliers must respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Suppliers must not interfere with the establishment, function, or administration of workers' organisations. Suppliers must allow workers to freely elect their own representatives where the right to freedom of association and collective bargaining are restricted under the law.

Suppliers must not discriminate, harass, intimidate, or retaliate against workers for being members of a union or participating in trade union activities, and provide worker representatives with access to their workplace.

05 HEALTH AND SAFETY

At Bullitt, we believe that all work can be done safely. We expect our Suppliers to support our commitment to keep each other, our workers, customers and the public safe. Suppliers must identify and comply with relevant workplace and product health and safety laws. Suppliers must implement and maintain a health and safety management system in accordance with the requirements of the international standard ISO45001.

5.1 OCCUPATIONAL SAFETY

Suppliers must take reasonable steps to identify workplace hazards and minimise the risk of workplace injury, illness, and disease for workers. Where identified and deemed necessary, Suppliers must provide workers with appropriate, well-maintained, personal, and general protective equipment, including education and training, free of charge. Suppliers must make best efforts to remove young workers, pregnant women, and nursing mothers from work with high hazards.

5.2 EMERGENCY PREPAREDNESS

Suppliers must identify and assess potential emergency situations and minimise their impact – harm to life, the environment and property – by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, fire detection and suppression, clear and adequate exit facilities, contact information for emergency responders, worker training, and drills annually or as required by the law, and recovery plans.

5.3 OCCUPATIONAL INJURY AND ILLNESS

Suppliers must maintain procedures and systems to prevent, manage, track, and report occupational injury and illness cases. Suppliers must investigate such cases and implement corrective actions to eliminate their causes and provide the necessary medical treatment to facilitate the return of workers to work.

5.4 INDUSTRIAL HYGIENE

Suppliers must identify workers' exposure to chemical, biological, and physical agents. Where identified and deemed necessary, Suppliers must provide workers with appropriate, well-maintained, personal and general protective equipment, including education and training, free of charge.

5.5 PHYSICALLY DEMANDING WORK

Suppliers must identify, evaluate, and control workers' exposure to physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

5.6 MACHINE SAFEGUARDING

Suppliers must evaluate production and other machinery for safety hazards and implement and maintain physical guards, interlocks, and barriers where machinery presents an injury hazard to workers.

5.7 SANITATION FOOD AND HOUSING

Suppliers must provide workers with ready access to clean toilet facilities, safe to drink water and sanitary food preparation, storage, and eating facilities. If Suppliers provide workers with dormitories, those must be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

5.8 HEALTH AND SAFETY COMMUNICATION

Suppliers must provide workers with appropriate workplace health and safety information and training for all identified workplace hazards prior to the beginning of work and regularly thereafter. Suppliers must post health and safety related information in the facility or place in a location identifiable and accessible by workers. Suppliers must encourage workers to raise any health and safety concerns without the fear of retaliation.

5.9 CUSTOMER AND PRODUCT SAFETY

Suppliers must implement effective systems to ensure products and services meet the relevant standards and legislative requirements. Suppliers must obtain all required certificates before exposing customers to safety risks that arise from the delivery of products and services. Suppliers must ensure that safety considerations are taken into account throughout the product lifecycle.

06 ENVIRONMENT

Bullitt has recognised its environmental responsibilities and we believe that all operations in our supply chain must identify the environmental aspects and minimise the adverse effects on the community, the environment, and natural resources.

Suppliers must implement and maintain an environmental management system in line with the requirements of recognised standards, such as ISO14001 or EMAS. Manufacturing Suppliers must maintain a valid certification of such systems by a nationally accredited certification body.

6.1 ENVIRONMENTAL PERMITS AND REPORTING

Suppliers must comply with all applicable environmental laws and standards. Suppliers must obtain, maintain, keep current and comply with the necessary environmental permits, approvals, and registrations, including the required reporting.

6.2 POLLUTION PREVENTION AND RESOURCE REDUCTION

Suppliers must identify, monitor, eliminate or minimise at the source, or treat hazardous pollutants and generated wastes released to air, water, and soil. Suppliers must reduce the use

of raw materials and natural resources in their operations, by innovation, environmental engineering, substitution, re-use and recycling of materials and solid waste.

6.3 HAZARDOUS SUBSTANCES

Suppliers must identify, label, and manage chemicals, waste, and other materials posing a hazard to humans or the environment to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

6.4 SOLID WASTE

Suppliers must implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous solid waste.

6.5 AIR EMISSIONS

Suppliers must characterise, monitor, control, and treat prior to discharge air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion by-products generated from operations. Suppliers must effectively manage ozone-depleting substances in accordance with the Montreal Protocol and applicable regulations.

6.6 MATERIALS RESTRICTIONS

Suppliers must deliver electronic products and components in line with the relevant regulations regarding the prohibition or restriction of specific substances in the regions of operation and of intended use. Supplier must make reasonable efforts to design, procure and deliver RoHS and REACH exemption-free products where possible.

6.7 WATER MANAGEMENT

Suppliers must implement a water management program that documents and monitors water sources, use and discharge. Suppliers must seek opportunities to conserve water, control channels of contamination, treat as required prior to discharge or disposal.

6.8 ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSION

Suppliers must establish a greenhouse gas (GHG) inventory and set corporate-wide reduction targets preferably in line with the SBTi's criteria. Suppliers must implement a monitoring system of energy consumption directly accounted for the manufacturing of products and/or provision of services to Bullitt. Suppliers on request will report to and work with Bullitt to improve energy

efficiency and to minimize their energy consumption and Scope 1, 2 and 3 GHG emissions.

6.9 SUPPORT ECO DESIGN EFFORTS

Suppliers must support Bullitt to improve the overall LCA profile of the products by designing and manufacturing energy efficient, durable, and easily repairable products; maximising the use of recycled materials; reducing the consumption of scarce and precious materials; reducing production waste; eliminating the use of hazardous materials; and to enable a responsible EOL treatment and recycling of products, in line with the requirements of WEEE regulations.

Suppliers must participate in new, sustainability related improvements as the industry, regulatory bodies and customers may require in the future.

07 ETHICS

At Bullitt, we are committed to ethical business practices, and we require every member of our supply chain to share the responsibility of understanding and complying with the principles of ethical behaviour and carrying out business with integrity.

7.1 BUSINESS INTEGRITY

Suppliers must uphold the highest standards of integrity in all business interactions. Suppliers must have a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, fraud, and embezzlement.

7.2 NO IMPROPER ADVANTAGE

Suppliers must have a zero-tolerance policy to prohibit the promising, offering, authorising, giving, or accepting bribes, anything of value, or other means of obtaining undue or improper advantage, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Suppliers must implement procedures to ensure compliance with anti-corruption laws and regulations. Suppliers must not lobby political parties or governments for business gains or other advantages. This entire section applies even if it is legal or common practice in a country.

7.3 DISCLOSURE OF INFORMATION

Suppliers must perform all business dealings transparently, and accurately reflect performance on the books and records. Suppliers must disclose information regarding labour, health and safety, environmental practices, business activities, structure, financial situation, and performance in accordance with applicable regulations and industry practices, without any falsification or misrepresentation of conditions and practices.

7.4 INTELLECTUAL PROPERTY

Suppliers must respect intellectual property rights and must not infringe legislation governing patents, trademarks, copyright, or intellectual property rights. Suppliers must treat all information provided by Bullitt as confidential unless otherwise stated at the time of disclosure.

7.5 FAIR BUSINESS, ADVERTISING, AND COMPETITION

Suppliers must uphold standards of fair business, advertising, and competition and must not enter into any agreements between competitors to fix prices of products and services, or to restrict competition in any other ways. Suppliers must conduct their business in full compliance with anti-trust and fair competition laws.

7.6 PROTECTION OF IDENTITY AND NON-RETALIATION

Suppliers must ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers is maintained, unless prohibited by law. Suppliers must have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

7.7 RESPONSIBLE SOURCING OF MINERALS

Suppliers must exercise due diligence in line with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas due diligence framework to reasonably assure that the minerals they use in their supply chain do not originate from regions associated with armed conflict and do not directly or indirectly finance or benefit groups that are perpetrators of serious human rights abuses.

Suppliers must report information of smelters, refiners, and chain of custody information, in line with the reporting practices as defined by the Responsible Minerals Initiative.

7.8 PRIVACY

Suppliers must protect the privacy of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers must comply with privacy laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

08 INFORMATION SECURITY

At Bullitt, we are committed to safeguarding our customers' and suppliers' data and networks. Suppliers must implement and maintain an Information Security Management System in accordance with the requirements of internationally recognised standards, such as ISO27001 or Cyber Essentials Plus.

8.1 CYBER SECURITY RISK MANAGEMENT

Suppliers must implement a process to identify and manage emerging and evolving cyber security risks and to regularly review such risks for developing strategies to detect, prevent and respond to them. Suppliers must focus on minimising the risks of incidents that affect the products and services provided to Bullitt.

8.2 SECURITY CONTROLS

Suppliers must implement the required security controls and related monitoring systems to prevent, detect and respond to security incidents. At minimum, Suppliers must implement controls to protect customer data from unauthorised access, use, damage, and disclosure. Suppliers must regularly review the effectiveness of the applied security controls.

8.3 CYBER SECURITY INCIDENTS

Suppliers must implement a consistent incident management framework focusing on fast risk mitigation and customer security. Suppliers must immediately notify Bullitt when incidents occur involving our customers' or employees' data.

8.4 REPORTING OF VULNERABILITY

Suppliers must implement a reporting channel for vulnerabilities identified or detected by third parties. Suppliers must investigate such vulnerability reports for inclusion in the review of cyber security risks.

8.5 INFORMATION SECURITY AWARENESS

Suppliers must implement internal communication and provide training for staff to ensure the effective implementation of information security controls and procedures.

09 MANAGEMENT SYSTEMS

Suppliers must develop, maintain, and implement policies consistent with this Supplier Code of Conduct and the applicable laws, and maintain appropriate management systems and documentation to demonstrate compliance with the Code. The management system must facilitate continuous improvement, providing objectives and targets to improve Supplier's social, environmental, and health and safety performance. Suppliers' Senior Management must endorse the policies and review the status of the management system on a regular basis.

Suppliers must maintain a process to identify, monitor, and understand applicable laws, regulations, and customer requirements, including the requirements of this Supplier Code of Conduct.

Supplier must identify and respond to the legal compliance, environmental, health and safety, information security, labour practice and ethics risks in Suppliers' operations. Supplier must provide training to staff and communicate the procedures, in a manner that is culturally appropriate and in a language that workers understand. Suppliers must have procedures allowing workers to bring workplace concerns to the attention of management or Bullitt for resolution and operate an effective grievance mechanism free from reprisal or retaliation.

Suppliers must regularly self-evaluate their processes to ensure conformity to legal requirements, the content of this Supplier Code of Conduct, and customer contractual requirements related to social and environmental responsibility. Suppliers must enable Bullitt to audit Supplier's compliance to this Supplier Code of Conduct, including audits conducted by third parties identified by Bullitt (primarily JAC audits and RBA Verified Audit Protocol assessment). Supplier must maintain a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.