

Supplier Code of Conduct



Global Policy

Owner: Daisy Yang

Approved: Clas Hansen

Pixii is committed to transforming the future of energy storage with innovative, smart technology solutions that uphold the highest standards of transparency, accountability, and environmental sustainability. The foundation of our success is not only our technology but also our global network of suppliers who contribute significantly to our business operations and our mission. This Supplier Code of Conduct outlines the principles and standards that all our business partners providing goods or services to Pixii – are required to adhere to. This code is based on internationally recognized standards, including the United Nations Global Compact and the International Labor Organization conventions.

The Supplier Code of Conduct is a living document, reflecting our evolving commitments to sustainability and ethical business practices. Pixii reserves the right to modify this Code at any time to accommodate new regulations, industry standards, or company policies. We expect you, as our supplier, to meet the sustainability standards by which we measure ourselves and ensure that these requirements and expectations are also passed on appropriately to your own downstream partners in the supplier network. By collaborating with Pixii, suppliers affirm their commitment to this Code's principles, aiding us in promoting a transparent, responsible, and environmentally mindful value chain. In return, Pixii pledges to engage in fair and ethical business practices, fostering a mutually beneficial relationship based on trust and respect.

Compliance and lawful practices

Suppliers must adhere to all laws, regulations and standards that apply to its product and business operations. Suppliers shall align internal policies to comply with higher standards as set forth by this code and specific policies, even when local regulations are less stringent.

Human rights and fair labor

Supplier are expected to uphold the highest standards of human rights and fair labor practices in their operations, ensuring equality, dignity and safe working conditions for all employees, including but not limited to the details below:

- **Human rights due diligence:** Suppliers must conduct due diligence to identify, assess eliminate or mitigate the risks of potential human rights violations within their operation and supply chains.
- **Refrain from discrimination, harassment and abuse:** Suppliers must cultivate an environment of equality where employees are treated without discrimination based on race, gender, age, sexual orientation, disability, religion, political opinion, nationality and origin or other similar statuses protected under local laws. Suppliers must ensure that pregnant and nursing workers are protected and only assigned appropriate tasks and working time.
- **Prohibition of child labor:** Suppliers are obligated to adhere to all applicable labor and employment laws regarding child labor. Any exploitation of children in the production, distribution, or provision of products and services is strictly prohibited. Suppliers should refer to the

International Labor Organizations Minimum Age Convention (No. 138) to clarify the minimum age for employment.

- **Protection of young workers:** Suppliers must ensure that young workers, under the age of 18, are not exposed to hazardous conditions that could effect their health and safety.
- **Withstand modern slavery and forced labor:** Suppliers must prevent any form of illegal and abusive labor such as modern slavery, forced labor and human trafficking. Suppliers needs to be aware that forced labor can take many forms including but not limited to bonded labor or debt bondage, prison labor, forced overtime, restriction on freedom of movement, withholding and non-payment of wages. All labor shall be voluntary with workers free to leave upon reasonable notice.
- **Uphold the right to freely associate and bargain collectively:** Suppliers must recognize and respect employees right to join, form, or not to join an association or labor union of their choice. Suppliers should have mechanisms in place for resolving disputes and ensuring effective communication with employees and/or their representatives.
- **Ensure minimum wages and benefits:** Suppliers must make sure that compensation meets or exceeds the legal or industry standard minimum wages. Workers should be provided with all legally mandated benefits. The practice of paid wages must be clear, transparent and free from illegal deductions.
- **Working hours, overtime and rest:** Suppliers must ensure that working hours comply with local legal standards, not exceeding the maximum set by applicable laws. Employees should be provided with regular breaks and at least one full day of rest within every seven-day period. Overtime must be voluntary and compensated at a premium rate.
- **Stable and fair employment:** Suppliers must see to that employment practices aims to provide stability and fairness, and avoiding precarious employment conditions. Suppliers must guarantee that their practices comply with local and national laws and international labor standards, providing greater protection where applicable.
- **Grievance mechanisms and remedy:** Suppliers should have grievance mechanism in place to allow employees, stakeholders and communities to report breaches of conduct and to seek remedy without fear of retaliation. Suppliers must ensure transparent and open communication channels for all workers to voice grievances and disputes.

Climate and environmental stewardship

The supplier shall comply with all national and international environmental regulations and standards that apply to its location of business and conduct regular audits to ensure compliance. Suppliers are mandated to actively contribute to the protection of the environment and biodiversity, mitigation of climate change, and the preservation of natural resources, demonstrating commitment to sustainable practices and the reduction of environmental impact, as outlined below and further in Pixii's environmental policy:

- **Environmental management and due diligence:** Suppliers should establish reasonable environmental management systems and conduct regular due diligence to identify, assess and evaluate potential risks, and to implement necessary measures to minimize negative impact on environment, biodiversity and climate. Pixii expects suppliers to make continuous improvements within responsible use of resources (in particular energy, water, raw materials and/or (primary) materials) and reduction of environmental impacts (in particular emissions, pollutants, waste).
- **Greenhouse gas emissions:** Suppliers must commit to reducing greenhouse gas emissions and set ambitious targets to mitigate climate change. Suppliers should track, document and provide Pixii with their greenhouse gas emissions (direct and indirect) upon request.
- **Resource conservation and circular economy:** Develop and establish effective waste management systems that promote waste reduction, reuse, recycling and proper disposal, particularly for hazardous and electronic waste.
- **Chemical management:** All supplied products, components and materials must meet the specifications and restrictions outlined in the European directives Registration, Evaluation, Authorization and Restriction of Chemicals Act (REACH), and Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS), to protect human health and the environment from hazardous substances. Suppliers are required to provide current and valid declarations of conformity from relevant authorities, confirming legal compliance with environmental standards and regulations.
- **Life cycle assessments (LCA):** When requested, suppliers are required to provide life-cycle assessments documenting the environmental impacts associated with their products from cradle to grave.
- **Adoption of recycled materials:** Suppliers are encouraged to opt for recycled materials over raw materials whenever possible, contributing to environmental sustainability. Additionally, suppliers should keep and submit (when requested) a precise documentation demonstrating sourcing and traceability of the recycled materials employed in their production and supply processes. We give preference to suppliers who help us to drive forward the use of recyclable materials and are committed to initiatives for growing the circular economy themselves.

Health and safety for all workers

Suppliers are expected to prioritize the health and safety of all employees in their operations, as outlined below:

- **Safe work environment:** Suppliers must provide a safe and healthy working environment for all employees, adhering to all applicable health and safety laws, regulations, and international standards. This includes proper maintenance and safe operation of all equipment and facilities.

- **Risk management:** Suppliers need to conduct regular risk assessments to identify, evaluate and control workplace hazards and potential health and safety risks. Implement preventive and corrective measures to address identified risks promptly.
- **Training and awareness:** Suppliers must provide ongoing health and safety training to all employees, including emergency response, fire safety and job-specific hazards. Promote a culture of safety awareness and encourage employees to report unsafe conditions or practices.
- **Worker protection:** Suppliers must provide appropriate protective equipment to all employees at no cost, and ensure proper use and maintenance of the equipment. Adapt measures to protect vulnerable groups, including pregnant or nursing workers, from specific risks.
- **Monitoring and reporting:** Suppliers must implement systems to monitor health and safety performance and compliance. Regularly review and report on outcomes to continually improve workplace conditions.

Ethical business conduct

Pixii is committed to maintaining the highest standards of integrity and professionalism in all aspects of our operations and supply chain. We expect our suppliers to adhere to similar ethical principles, ensuring transparency, honesty and fairness in all business practices, as outlined below:

- **Anti-corruption and bribery:** Suppliers must strictly prohibit any form of corruption, bribery, extortion, or embezzlement. This includes offering or accepting bribes or inappropriate gifts to and from anyone, including government officials or private sector employees, during the course of all business dealings.
- **Fraud and misrepresentation:** Suppliers must conduct all business transactions and communications honestly and accurately, preventing any fraudulent activities or misrepresentations.
- **Intellectual property rights:** Respect for intellectual property rights is imperative. Suppliers must protect and not infringe upon the intellectual property rights of Pixii and others, ensuring all proprietary information, software, and patents are used legally and ethically.
- **Trade compliance:** Suppliers are expected to adhere to all applicable international and local trade compliance laws and regulations, including those related to sanctions, export controls, and import requirements. This includes obtaining all necessary export licenses and making truthful declarations to customs authorities.
- **Conflict of interest:** Suppliers must avoid all conflict of interest or situations where their provision of products or services to Pixii could be compromised. Suppliers must therefore refrain from entering into relationships or transactions that might impair their judgement as to what is best for the company. Any potential conflict of interest should be disclosed to Pixii immediately for review and resolution.



- **Fair competition:** Suppliers must commit to fair and open competition, complying with antitrust and competition laws in all territories where they operate. Unlawful practices such as price fixing, market division, or bid rigging are strictly prohibited.
- **Confidential information:** Maintaining the confidentiality of information is crucial. Suppliers must safeguard Pixii's confidential information and respect any non-disclosure agreements, using such information only for legitimate business purposes as authorized by Pixii.
- **Reporting and whistleblowing:** Suppliers are encouraged to report any concerns or violations of the Code of Conduct, including any unethical business practices through Pixii's designated reporting channels. Suppliers must protect whistleblowers from retaliation and ensure their concerns are addressed appropriately and promptly.

Conflict minerals

Pixii is dedicated to ethical sourcing of all materials used in our products and supply chain. We recognize the importance of sourcing minerals responsibly to avoid contributing armed conflicts, human rights abuses and environmental degradation. In alignment with international standards and best practices, Pixii expects Suppliers to follow our guidelines for the sourcing of minerals as outlined below:

- **Conflict minerals:** Suppliers must take measures to ensure that products supplied to Pixii do not contain minerals that directly or indirectly finance or benefit armed groups in conflict-affected and high-risk areas (CAHARs). This applies to any conflict minerals (tin, tantalum, tungsten, and gold or referred to as 3TG).
- **Due diligence and transparency:** Suppliers are required to conduct thorough due diligence on their supply chains in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CARHAs). This includes providing Pixii with complete and transparent information upon request regarding the origin and supply chain of minerals used in products supplied to Pixii.
- **Extended minerals:** Beyond conflict minerals, suppliers are expected to responsibly source other critical minerals such as aluminum, cobalt, lithium, copper, mica and zinc. Supplier should strive to ensure that the extraction and processing of these minerals do not contribute to human rights abuses or environmental degradation.
- **Audits and certification:** Suppliers are encouraged to engage in industry initiatives and independent third-party audits to verify responsible sourcing practices.
- **Reporting and cooperation:** Upon request, suppliers must provide Pixii with annual reports on mineral sourcing practices and cooperate fully in any audits or inquiries related to mineral sourcing. Suppliers should implement corrective action plans to address any identifies issues or non-compliance.

Data privacy and security

In alignment with Pixii's commitment to safeguarding personal information and upholding the highest standards of data security, our suppliers are required to adhere to the following data privacy and security practices as well as our privacy policy:

- **Personal data protection and compliance:** Suppliers must ensure the collection, usage, and storage of personal data is conducted in a manner that is fair, lawful, and transparent. Adherence to all applicable privacy laws and guidelines is mandatory to prevent unfair discrimination and to demonstrate compliance.
- **Data processing and transparency:** The processing of personal data should be clear and transparent. Suppliers must communicate any changes in data processing activities promptly and respect individuals' privacy preferences handling their data respectfully and lawfully.
- **Cooperation with legal authorities:** In events of inquiries, investigations, or audits, suppliers are expected to cooperate fully with legal authorities, ensuring that personal data is processed and utilized solely for legitimate and authorized purposes.
- **Cybersecurity practices:** Suppliers must utilize all IT resources and personal data responsibility, ensuring their protection against unauthorized access or breaches. This involves adhering to established cybersecurity laws and standards and implementing appropriate safeguards to secure Pixii's and third-party data.
- **Cybersecurity requirements compliance:** Suppliers must maintain robust defense against cyber threats and attacks, complying with prevalent cybersecurity requirements. Regularly update security measures to address new emerging threats and weaknesses.

Supply chain integrity and procurement standards

Pixii is dedicated to ethical business practices and sustainability throughout our supply chain. We require our suppliers to extend these commitments to their own supply chains, ensuring that our standards of ethical conduct, environmental stewardship, and human rights are upheld by all associated parties.

Suppliers are expected to adhere to the following principles:

- **Suppliers engagement and standards:** Engage with your suppliers to communicate Pixii's expectations regarding ethical conduct, environmental responsibility and social accountability. Supplier must ensure their suppliers and subcontractors comply with standards consistent with, and no less strict than those outlined in Pixii's Supplier Code of Conduct.
- **Due diligence and risk assessment:** Conduct thorough due diligence and regular risk assessments within your supply chains to identify and address areas of concern related to labor practices, environmental impact, data security and business ethics.
- **Transparency and reporting:** Maintain transparency in supply chain practices and provide Pixii with relevant documentation and reports upon request. This includes information about subcontractors, sourcing practices and compliance with applicable laws and standards

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- **Grievance mechanism:** Establish and, where feasible, maintain an effective operational-level grievance mechanism to address concerns from individuals, stakeholders, and communities affected by their operations. Please report any violations of the Supplier Code of Conduct through our compliance platform accessible to business partners and third-party intermediaries through our website.

Code of Conduct Commitment Declaration

This document serves as a formal declaration from the undersigned entity regarding our partnership and responsibilities as a supplier to Pixii.

We hereby acknowledge and agree to adhere to the standards and expectations set forth in the Pixii Supplier Code of Conduct. We confirm that our business operations and practices align with the principles of ethical conduct, human rights, environmental sustainability and fair labor practices as outlined in the code. We commit to the following:

1. Ensuring that our practices meet or exceed the standards described in the Pixii Supplier Code of Conduct.
2. Implementing effective systems and controls to comply with the stipulated requirements.
3. Providing ongoing training to our employees and business partners to ensure they understand and comply with these standards.
4. Promptly reporting any violations or concerns related to the Code of Conduct to Pixii through the designated channels.
5. Collaboration with Pixii to address any issues of non-compliance and commit to continuous improvement in our business practices.

We understand that adherence to the Pixii Supplier Code of Conduct is a requirement of our ongoing business relationship and that failure to comply may result in a reevaluation or termination of this relationship. By signing below, I affirm my company's commitment to these principles and dedication to maintaining the highest standards of integrity and responsibility in all aspects of our operations.

Signature: _____

Printed Name: _____

Title: _____

Company Name: _____

Place & Date: _____