



Supplier Code of Conduct

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1. Introduction

Enfinity Global Group (“Enfinity”) is committed to conducting business activities with honesty and integrity and in compliance with applicable legal and regulatory requirements. We expect Suppliers and their employees, personnel, agents, and subcontractors, who are providing goods or services to Enfinity (collectively “Suppliers”) adhere, at a minimum, to the same commitments to ethics and compliance as this Supplier Code of Conduct (“Code”), and to have the necessary policies and procedures in place to support such commitments within their supply chain. If you have any questions regarding this Code, please contact your Enfinity representative.

2. General Principles

2.2. Legal and Regulatory Compliance

Enfinity has global business activities and expects Suppliers to understand and comply with applicable laws and regulations and maintain all appropriate licenses, permits and other regulatory authorizations and requirements necessary to conduct the activities for which they have been hired by Enfinity.

2.3. Responsible Supply Chain

Enfinity requires our Suppliers to:

- Have appropriate policies and programs to maintain good relationships with local communities and other stakeholders.
- Have strategies in place to reduce their environmental impact over time.
- Use resources responsibly and conduct operations with the aim to protect and preserve the environment. As appropriate, Supplier facilities must have suitable plans for notifying local authorities in the case of accidental discharge or release of hazardous materials or any other environmental emergency.
- Take guidance from international standards, conventions, and declarations, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the International Labor Organization Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.
- Provide their stakeholders access to grievance mechanisms for raising concerns confidentially without fear of retaliation.
- Upon request, provide evidence of compliance with requirements of our Supplier Code of Conduct.

3. Anti-Corruption, Anti-Money Laundering & Sanctions

Enfinity has a zero-tolerance approach towards bribery and corruption, money laundering, tax evasion, and sanctions and export control violations.

Enfinity has in place an Anti-Bribery & Anti-Corruption Policy designed to prevent employees and suppliers from paying or receiving bribes or undertaking corrupt activities. Suppliers must comply with these principles and uphold our standards and to develop and maintain policies and programs as appropriate to ensure that their representatives understand and adhere to these standards. Suppliers shall:

- Comply with all applicable anti-bribery, anti-corruption, and anti-money laundering laws.
- Refrain from offering or making any payments of money or anything of value to any public officials, political parties, candidates for public office, charities or other business-related parties that could be considered to improperly influence any act or decision of such official or person for the purpose of promoting the business interests of Enfinity in any respect, or otherwise in violation of applicable law. This includes a prohibition on “facilitation” payments of any kind.
- Refrain from entering business relationships or transactions with Enfinity personnel in an individual

capacity or in any way that could create the appearance of a conflict of interest or impropriety.

- Disclose to Enfinity and avoid or appropriately manage any actual or potential conflicts of interest arising due to either personal or business relationships.
- Not facilitate tax evasion.
- Promptly apprise Enfinity in the event either they or any related company (including parent companies) have been: (i) named or listed as the target of any economic, trade, or transactional sanctions imposed by any governmental agency; or (ii) otherwise banned or blocked pursuant to any laws that are enforced or administered by any governmental agency.
- Comply with all applicable trade restrictions and sanctions laws, and not employ or do business with anyone suspected of being connected with criminal or terrorist activities or who is the subject of applicable trade sanctions.

4. Human Rights & Labor

The Supplier agrees to respect human rights of your workers and others in your business operations and activities, including: (i) prohibiting the use of forced labor, including prison or indentured labor, and ensuring workers are not subject to any form of physical, sexual or psychological compulsion, exploitation, violence, coercion or inhumane treatment, or other forms of human trafficking; (ii) ensuring that a worker's identity or immigration documents are not withheld or destroyed; (iii) allowing workers to terminate their employment, for any reason, with reasonable notice; (iv) ensuring that recruitment fees of any type are not deducted from workers' pay or otherwise charged to workers; (v) prohibiting the use of fraudulent or misleading recruitment practices; (vi) ensuring that, upon end of employment, workers are reimbursed for their return transportation costs (for workers recruited from outside the country); (vii) providing workers with terms and conditions of employment in a language the worker understands, (viii) prohibiting the employment of workers under fifteen (15) years of age (or local legal age if higher); and (ix) prohibiting the employment of workers under eighteen (18) years of age (or local legal age if higher) for shall not perform work that is likely to jeopardize their health or safety, including night shifts or overtime.

5. Health, Safety & Environment (HSE) Standards

The Supplier will comply with the applicable laws, rules and regulations as well as applicable international standards pertaining to the protection of human health and safety and the environment.

The Supplier will also:

- Obtain, maintain and produce to Enfinity upon request all required environmental licenses and official documents related thereto, and operate in accordance with registration requirements of those licenses.
- Minimize or eliminate environmental pollution and waste, including wastewater and energy.
- Control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases.
- Provide training and ensure workers are properly educated in HSE issues.
- Take responsibility for the health and safety of its workers and operate with a sound occupational health & safety management system.
- Identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills.
- Provide, as may be requested by Enfinity, complete, consistent, and accurate data relating to Supplier's emissions or other ESG-related data and metrics. Additionally, Enfinity encourages Suppliers to actively reduce their emissions and collaborate with their own suppliers to minimize emissions throughout their supply chain and promote a more sustainable and responsible value chain. Enfinity may also require Suppliers to provide independent or third-party assurance over such disclosed emissions or other ESG-related data.

6. Responsible Mineral Sourcing

The Supplier agrees to (i) adopt policies and establish systems to procure tantalum, tin, tungsten, gold and other rare earth minerals from sources that do not directly or indirectly finance armed groups in the Democratic Republic of the Congo or conflict-affected high risk areas; and (ii) provide supporting data on its supply chain for tantalum, tin, tungsten, gold, or other requested rare earth minerals to Enfinity if requested.

7. Conflicts of Interest

The Supplier agrees to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. A relevant conflict of interest typically occurs when personal interests interfere with or appear to interfere with Supplier's ability to perform the work/services without bias. Suppliers are expected to notify Enfinity if an actual or potential conflict of interest arises. This includes any situations of potential or apparent conflicts between Suppliers' or their workers' personal interests and the interests of Enfinity.

8. Intellectual Property & Privacy

The Supplier agrees to respect intellectual property rights of Enfinity and of third parties, including all patents, trademarks, copyrights and trade secrets. Suppliers must also comply with applicable privacy and data protection laws and have appropriate processes and practices to secure and protect personal data provided by Enfinity to Supplier.

9. Antitrust & Competition Laws

The Supplier agrees to conduct business in full compliance with applicable antitrust and competition laws that govern the jurisdictions in which they conduct business.

10. Compliance with Code of Conduct & Audits

This Supplier Code of Conduct sets forth the minimum requirements that must be met to become and remain an Enfinity Supplier. We encourage our Suppliers to have due diligence and management systems in place to maintain these minimum requirements. By working closely with our Suppliers, we believe we can achieve success together while helping communities, our stakeholders, and the wider world thrive. While Suppliers are expected to self-assess and demonstrate their compliance with our Supplier Code of Conduct, Enfinity may audit Suppliers or inspect Suppliers' facilities to confirm compliance, including unannounced audits as needed and based upon risk. Suppliers that behave in a manner that is unlawful or inconsistent with the the Supplier Code of Conduct risk termination of their business relationship with Enfinity. Complying with the Supplier Code of Conduct is required in addition to meeting any other obligations contained in any contract a Supplier may have with Enfinity.

11. Raising Concerns

Subject to local laws and any applicable legal restrictions, Suppliers are expected to inform Enfinity of actual or suspected conduct or business practices that violate this Code. You may raise a concern or get help by:

- Contacting your Enfinity representative; or
- Contacting our secure Enfinity Ethics Reporting Hotline. Concerns may be raised via phone or by filing an online report. Contact details and further information may be found at enfinity.ethicspoint.com.

Getting in touch with us quickly helps to prevent problems and correct any that have already occurred. We handle all reports promptly, fairly, and as confidentially as possible. Enfinity forbids retaliation against any person reporting such a concern.

Note: Suppliers do not need to be certain that a violation has occurred, but rather should raise a concern when there is a good faith belief that something improper, a violation of law or policy, has occurred. Enfinity fully examines every integrity concern raised and takes necessary remedial actions where appropriate.