

SUPPLIERS CODE OF CONDUCT

ADAPTIT S.A. is committed to acting in accordance with the principles of transparency, trust, business ethics and social responsibility and for this reason has established operating standards and practices that are reflected in the Code of Professional Conduct Human Rights Policy and Sustainable Development Policy that bind and apply to all parts of the company, the members of the Boards of Directors, the Directors, the employees no exception or deviation.

Similarly, it expects its suppliers/partners to embrace similar principles of operation by observing the terms of this Code.

This Code describes the general requirements that apply to any supplier providing goods and services to ADAPTIT S.A.. It does not replace/supersede any law or provision of a specific contract since absolute compliance with existing legislation as well as contractual obligations is an indisputable condition for cooperation, but it functions in addition as a guideline for the observance of principles of sustainable and ethical business behavior in its supply chain.

1. Compliance with the law

Suppliers undertake to comply with the applicable laws and regulations of the country under which they must operate.

2. Combating Bribery – Corruption

Suppliers must fully comply with all applicable local and international anti-corruption and anti-bribery laws by conducting all business transactions with transparency and integrity. They may not offer, pay, demand, or accept any service, amount of money or any other benefit of value to a third party (public or private employee) for the purpose of securing favorable treatment/unfair advantage and should have zero tolerance for such actions . Also, suppliers must avoid conflicts of interest that could lead to corruption risks.

3. Security and Data Protection

Suppliers must comply with all applicable privacy, data protection and information security laws.

4. Respect for the fundamental human rights of employees

Suppliers must treat all their employees with respect.

- Discrimination of any kind is prohibited and not acceptable, including but not limited to discrimination based on race, color, age, sex, sexual preferences, nationality, disability, religious

or political beliefs, membership in unions or family status both at the time of recruitment and at the time of employment. Staff recruitment must be done on the basis of their abilities in relation to the requirements of each job and not on the basis of their personal characteristics or beliefs.

- Suppliers must provide wages in compliance with all applicable laws and their operations must fully comply with applicable laws on wages and hours, overtime, and benefits. Any type of illegal work is prohibited.
- Suppliers must not use any form of forced labor or bonded labor. Employment must be offered at will, and your employees must be free to leave employment or terminate their employment upon notice, within a reasonable time, without unlawful penalty.
- Suppliers must not require workers to submit any official original document (ID, passport, work permit, etc.) or other "guarantee" as a condition of employment.
- Suppliers are committed to the right of employees to freely participate in labor unions and collective bargaining.

5. Health & Safety at Work

Suppliers must provide and maintain a safe working environment, always in compliance with applicable laws and regulations, taking all necessary preventive measures to avoid accidents and illnesses. They must also provide appropriate training to employees in health and safety matters as well as all the necessary Personal Protection Equipment where this is required.

6. Child Labor

Suppliers must comply with relevant legislation regarding minimum age limits for the recruitment of workers at all stages of their activities.

7. Environmental Protection

Suppliers undertake to operate in an environmentally responsible manner by complying with relevant national and international environmental standards and applicable legislation. In addition, they must act with the aim of limiting the burden on the environment by implementing measures that contribute to the prevention of pollution and the protection of the environment.

8. Compliance with the Code

The suppliers of ADAPTIT S.A. should comply with this Code, the provisions of which constitute basic criteria for their business activity and conduct.

In the case they use subcontractors or other suppliers for the implementation of a project, then they must also comply with the principles of this Code.

ADAPTIT S.A. may request supporting documents, certificates, and various other official documents to confirm compliance with this Code. In the event that a corresponding Code of Conduct is already applied which exceeds the rules herein then it is accepted by ADAPTIT S.A..

Supplier' s Declaration

The undersigned, I notify on behalf of the company that I have read and understood the policies and principles described in the ADAPTIT S.A. Supplier Code of Conduct.

Company name: _____

Signatory's name and job title: _____

Signature and stamp: _____

Date: _____