



October 2025 V01

Supplier Code of Conduct



Table of Contents

SUPPLIER CODE OF CONDUCT UPDATED: JUNE 2025	1
TABLE OF CONTENTS.....	2
SUPPLIER CODE OF CONDUCT	3
II. HUMAN RIGHTS AND FAIR LABOR PRACTICES	3
III. ENVIRONMENTAL, HEALTH, SAFETY & SECURITY (EHSS).....	4
IV. ENVIRONMENTAL SUSTAINABILITY	4
V. CONFIDENTIALITY & DATA PROTECTION.....	4
VI. CONFLICT MINERALS	4
VII. COMPLIANCE MONITORING AND AUDIT.....	5
VIII. SUBCONTRACTOR COMPLIANCE	5
IX. REPORTING CONCERNS	5
X. ANTIDUMPING AND COUNTERVAILING DUTIES	5



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Supplier Code of Conduct

De Well Group, together with its subsidiaries ("DE WELL"), is committed to the highest standards of ethical business conduct, environmental stewardship, and legal compliance. This Supplier Code of Conduct ("Code") outlines the principles and expectations for all individuals and companies ("Suppliers") that do business with De Well Group globally.

Suppliers are expected to operate in alignment with DE WELL's values and business practices, including transparency, accountability, fairness, and compliance with all applicable laws. Upholding this Code is essential to preserving De Well Groups' reputation and maintaining responsible global supply chains.

I. LEGAL AND REGULATORY COMPLIANCE

Suppliers must comply with all applicable local, national, and international laws and regulations in the jurisdictions where they operate, including:

- **Anti-Corruption:** Suppliers must not engage in bribery or corrupt practices and must comply with global anti-corruption laws.
- **Conflicts of Interest:** Suppliers must avoid actual or perceived conflicts of interest. Supplier personnel or their family members employed by DE WELL must not be involved in decisions affecting the business relationship.
- **Business Records:** All financial, operational, and business records must be accurate, complete, and truthful.
- **Gifts and Hospitality:** Modest gifts and business meals are acceptable if they are customary, legal, and do not create any sense of obligation. Cash or extravagant gifts are strictly prohibited.

II. HUMAN RIGHTS AND FAIR LABOR PRACTICES

DE WELL upholds the dignity and rights of all workers. Suppliers must:

- Prohibit the use of child labor, adhering at minimum to local laws.
- Comply with all applicable laws regarding wages, working hours, and legally mandated benefits.
- Ensure no use of forced, bonded, or prison labor, including any form of human trafficking.
- Respect freedom of association and collective bargaining in accordance with local laws.
- Maintain a workplace free from discrimination, harassment, and abuse.
- Promote diversity, equity, and inclusion in hiring and employment practices.

III. ENVIRONMENTAL, HEALTH, SAFETY & SECURITY (EHSS)

Suppliers are responsible for ensuring safe and environmentally sound operations, including:

- Maintaining a healthy, clean, and safe work environment.
- Implementing EHSS policies and management systems to monitor risk and ensure emergency preparedness.
- Ensuring physical security and access control at facilities.
- Avoiding use of physical discipline and ensuring the dignity of all workers.

IV. ENVIRONMENTAL SUSTAINABILITY

Suppliers should actively work to reduce their environmental impact and:

- Conserve natural resources and reduce waste.
- Minimize the use of hazardous materials.
- Reuse and recycle wherever possible.
- Develop and adopt climate-friendly technologies and processes.

V. CONFIDENTIALITY & DATA PROTECTION

Suppliers must:

- Protect DE WELL's **confidential and proprietary information** from unauthorized use or disclosure.
- Safeguard **personal data** in accordance with applicable data protection laws and maintain appropriate data security practices.
- Notify DE WELL immediately of any known or suspected data breach involving DE WELL's information.

VI. CONFLICT MINERALS

Suppliers must ensure that tantalum, tin, tungsten, and gold (3TG) in products supplied to DE WELL are sourced responsibly and do not finance armed conflict. Suppliers must:

- Disclose the country of origin and smelter information for any 3TG materials.
- Cooperate with DE WELL in conflict mineral due diligence efforts.



VII. COMPLIANCE MONITORING AND AUDIT

- Suppliers must notify DE WELL if they become aware of any noncompliance with this Code.
- DE WELL reserves the right to conduct audits or request supporting documentation to verify compliance.
- DE WELL may terminate business relationships for violations of this Code.

VIII. SUBCONTRACTOR COMPLIANCE

Suppliers must ensure that their **subcontractors and suppliers** involved in DE WELL business comply with the standards outlined in this Code.

IX. REPORTING CONCERNS

Suppliers are encouraged to report concerns related to ethics, compliance, or violations of this Code to their DE WELL contact, management, or the DE WELL Legal Department.

- Reports will be treated confidentially to the extent permitted by law.
- DE WELL strictly prohibits retaliation against individuals who report concerns in good faith.

X. ANTIDUMPING AND COUNTERVAILING DUTIES

International Suppliers must not dump products into the U.S. at prices below fair market value or receive unlawful subsidies. Suppliers:

- Warrant they do not receive government subsidies for this purpose.
- Agree to cooperate fully in any antidumping/countervailing investigations.