

Third Party Conduct Principles

1. Third Party Conduct Principles

Photon Energy Group (or the 'Group') is defined as a group of companies which are subject to unified governance and management performed by the mother company, Photon Energy N.V. In order to ensure fairness in all of its activities, The Group has implemented a Code of Ethics defining its principles of business ethics and organisational rules. Photon Energy Group expects all of its partners and suppliers to follow certain rules and guidelines derived from the Group's values.

As such, Photon Energy Group has established these Third Party Principles (hereafter referred to as 'Principles') reflecting the Group's core values and the basic principles laid out in the Group's Code of Ethics which are relevant for each partner and supplier (or 'Third Party' or 'you') that works with the Group.

By signing this document, you acknowledge and commit to adhere to and comply with the Principles laid out below.

Ethics

2. Legal Compliance

The Third Party will comply with relevant laws and regulations applicable in countries where it conducts business. In addition, The Third Party will comply with these Principles unless they conflict with local laws and regulations. Local regulatory and legal compliance must also extend to agents, intermediates or other authorities that the Third Party engages to the Third Party's best knowledge.

3. Prohibited Business Practices

The Third Party undertakes to avoid and oppose fraud, corruption, unfair competition (such as illegal cooperation on pricing, illegal market sharing or any other behaviour that is in breach of relevant competition), money laundering, terrorist financing and any other prohibited business practice. The Third Party will not offer, promise or give any undue advantage, favour or incentive to any public official or any other third party. This applies regardless of whether the undue advantage is offered directly or through an intermediary. The Third Party declares is not involved in any form of money laundering and commits to take steps to prevent financial transactions involving the Group from being used by others to launder money.

4. Conflicts of Interest

The Third Party will avoid situations in which the parties involved have a conflict of interest. The Third Party undertakes to never take part in or attempt to influence a decision or settlement if there is a conflict of interest which could give grounds to questions related to its employees' impartiality. Neither the Third Party nor its employees will engage in actions nor have interests that hinder their ability to carry out work for the Group objectively and effectively. If the Third Party becomes aware of a potential conflict of interest it will, without undue delay, notify the Group through their contact person or through the SpeakUp Line, the secure webpage, available at: <https://www.photonenergy.com/en/photon-energy-group/reporting-misconduct.html>, which is operated by an independent external provider.

5. Gifts, Hospitality and Expenses

The Third Party undertakes to not, directly or indirectly, influence the conduct or behaviour of Photon Energy Group employees or representatives by offering gifts, unless the gift is ethically justifiable, and never in situations connected with contract negotiations, bidding or awards. Hospitality (such as social events, meals or entertainment) may be offered if there is a clear business purpose, but the cost must be kept within reasonable limits and always be ethically justifiable.

Human Resources Principles

6. Human Rights

The Third Party hereby confirms that it supports and respects international human rights. The Third Party confirms that it places the foremost importance upon ensuring compliance with labour standards, confirms that it has all necessary internal regulations in place and that it does not tolerate any form of modern slavery such as **forced labour**, **child labour** or **discrimination** (as detailed in sections 8 and 9 of this document) in the workplace. The Third Party undertakes to not in any way cause or contribute to the violation or circumvention of human rights. Equal opportunity, harassment and discrimination laws and regulations will be strictly adhered to by the Third Party.

7. Forced Labour

The Third Party confirms that it does not use forced or compulsory labour and undertakes to not use forced or compulsory labour. Forced Labour means all work or service, not voluntarily performed, that is exacted from an individual under threat of force or penalty, as further defined by ILO Instruments on Forced Labour¹. All labour will be voluntary, and workers must be free to leave with reasonable notice. Employees will under no circumstance be required to submit deposits of money or identity papers with their employer.

8. Child Labour

The Third Party confirms that it does not employ any person who is below the minimum legal age for employment and undertakes to not employ any such person. Where a child (persons under 18 years) is employed, the best interests of the child will be primarily considered. Policies and programmes that assist any child found to be performing child labour will be contributed to, supported, or developed. Children will not be employed for any work that is likely to be hazardous or may interfere with the child's health or physical, mental, spiritual, moral or social development.

9. Freedom of Association

The Third Party will respect its employees' right to associate freely, join worker's associations, seek representation and bargain collectively, as permitted by and in accordance with local laws.

10. Discrimination

The Third Party will behave with respect and integrity towards anyone it encounters through its work for the Group. The Third Party will not tolerate any kind of discrimination in relation to its employees based on age, gender, sexual orientation, health status, race, nationality, political opinion, national and social origin or religion. The Third Party will also prevent any form of bullying or exploitation.

11. Disciplinary Practices

The Third Party undertakes to treat employees with respect and dignity. Physical or verbal abuse or other harassment and any threats or other forms of intimidation are strictly prohibited.

12. Working Conditions

The Third Party will ensure that its employees understand their employment conditions and will provide reasonable pay and terms of employment. The Third Party will also comply with local laws with respect to working hours.

¹ ILO means the International Labour Organisation, the tripartite United Nations agency which brings together governments, employers and workers of its member states in common action to promote decent work throughout the world. The conventions can be found at https://www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang--en/index.htm.

Health and Safety, Natural Environment

13. Health and Safety

The Third Party will provide a safe, non-hazardous working environment and will comply with any applicable laws and regulations in accordance with internationally accepted standards. Appropriate health and safety information, equipment, support processes and training must be provided to employees.

14. Preservation of the Natural Environment

The Third Party shall strive to avoid or minimise and compensate for negative impacts on the environment by monitoring the environmental effects of all its operations. The Third Party is obliged to comply with local environmental legislation, environmental protection guidelines and discharge permits. The Third Party will conduct its work according to internationally recognized environmental management principles and aim for continuous improvement with regards to environmental impact.

15. Selection of Business Partners, Agents and Other Intermediaries

The Third Party shall use its best efforts to ensure that its existing and potential business partners, agents and intermediaries adhere to these principles related to Photon Energy Group. The Third Party will, upon request of Photon Energy Group, provide proof of such implementation; the form of this proof being for example the Third Party's adopted internal regulations or description of processes within its organization. The Third Party undertakes to ensure that its subcontractors comply with these Third Party Conduct Principles to the same extent as the Third Party is bound by it.

16. Supplier Standards

The Third Party will promote the implementation of these Principles by its own suppliers in all transactions related to Photon Energy Group.

17. Other

The Third Party undertakes to continually implement improvement principles within its operation and adhere to agreed quality standards, as well as product or solution warranties and guarantees. Security and data privacy regulations and local standards will also apply.

By signing this document (by the authorized representative of the Third Party), the Third Party confirms that as a partner or supplier to Photon Energy Group:

Will fulfil, to its best knowledge the requirements set forth in these Principles;

Acknowledges that any agreement(s) and/or purchase order(s) concluded with Photon Energy Group is/are hereby amended to incorporate these Third Party Conduct Principles and any failure to comply with these principles and requirements will be considered a breach of your contractual relationship with Photon Energy Group, which may result in the termination of the agreement and/or purchase order.

Company name / Name: _____

Registered seat / Residence address: _____

Name of the authorized representative: _____

..... (place), (date)

.....

(signature)