

EPS GLOBAL ETHICAL TRADING POLICY

At EPS GLOBAL, as a distributor and value add reseller, we recognise the responsibility that we share with our suppliers to buy, produce and sell our products in an ethical manner. Our Ethical Trading Policy is a core element of this commitment to responsible sourcing.

PURPOSE

We want our customers to be confident that the people who make our products are treated fairly, with respect for human rights and are not exposed to unsafe working conditions. We believe that when ethical standards are in place, this can improve worker wellbeing, productivity and quality, which benefits both our suppliers and our customers. We seek to develop long-term trading relationships with suppliers based on the principle of fair, open and honest dealings at all times to the benefit of all parties.

SCOPE

EPS GLOBALS Ethical Trading Policy sets out the standards that we expect to be in place throughout our supply chain. All suppliers are required to comply with this policy. This policy covers but is not limited to the Ethical Standards detailed below.

THE POLICY

EPS GLOBAL expects all organisations involved in its supply chain to conform with the following ethical standards, and any associated laws and regulations in the supplier's region of operation at all times.

- 1. **No forced labour** suppliers must not use forced, bonded or involuntary labour.
- 2. Freedom of association and collective bargaining suppliers shall respect that workers have the right to join a union or form trade unions of their own choosing and to bargain collectively, without discrimination towards members or their representatives.
- 3. Safe & hygienic working conditions suppliers shall provide (where applicable) access to clean amenities, clean drinkable water, accommodation, and food preparation. Worker safety shall be of utmost importance including the management of safety hazards so far as is reasonably practicable and compliance with applicable laws and standards. Safety and emergency training and equipment shall be provided.
- 4. **No child labour** organisations in the supply chain shall not employ a worker under the age stipulated by the local/regional legal limit. Young labour (under the age of 18) shall not be employed at night and shall not work in hazardous conditions.
- 5. Wages must be paid wages and benefits paid for a standard working week must meet, at a minimum, any applicable national legal laws, standards, regulations or industry benchmark standards, whichever is the higher. Employment contracts must be documented (including wages and employment conditions) and be clear and unambiguous. Wage deductions as a disciplinary measure are not permitted.
- 6. **Fair working hours** working hours for all workers shall comply with national/local laws and industry benchmark standards. Overtime must be voluntary and compensated at a premium rate (recommended to be not less than 125% of the regular rate of pay or local laws). Workers shall be provided at least one day off in every 7-day period or two days off in every 14-day period (where allowed by the national law).
- 7. No discrimination or harassment there shall be no discrimination related to the hiring of workers, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Physical, sexual or verbal harassment or abuse of any kind is not be permitted in the workplace.
- Regular employment organisations in the supply chain must ensure that, to every extent possible, work performed must be based on recognized employment relationships established through national laws and practices.
- 9. No harsh or inhumane treatment the use of physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is strictly prohibited.
- 10. No bribery or corruption under no circumstances will EPS GLOBAL tolerate the practice of bribery and corruption in any shape or form in dealings with a supplier or subcontractor or any of their employees, or associated parties.

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- 11. Respect the environment suppliers and subcontractors shall be committed to respecting the environment, compliance with the requirements of the applicable local and international laws and regulations and are responsible for ensuring key environmental impacts are identified and controlled to minimise the impact of operations on the environment.
- 12. **Transparency in and from, all business relationships** suppliers must disclose all subcontractors used in the supply chain (if requested). Suppliers and subcontractors must also conform to the requirements of this policy and not refuse inspection from any auditor.

Responsible parties

EPS Global's Board of Directors is responsible for reviewing and overseeing corporate responsibility policies and programs. EPS Global's Sustainability and ESG team, which includes Chief Operations Officer (COO) Mick McCarthy and Global Sustainability Coordinator (GSR) Ronan McGeehan oversee the implementation of these policies and coordinates our efforts to identify, address, train and report on our ESG risks and opportunities and foster a dialogue on these issues with ESG experts, employees, shareholders and other stakeholders.

Mick Mc Carthy Chief Operating Officer **Date:** 15, FEB 2022 **Author:** Ronan Mc Geehan **Revision:** Rev 1.0