



Supplier Code of Conduct

NOVEMBER 2022



Planet's supplier code of business conduct

Planet is committed to integrity and compliance in everything we do. As part of that commitment, Planet expects its suppliers to ensure that they provide their employees a safe working environment, that they treat their workers with dignity and respect, that they engage in environmentally sound and sustainable manufacturing processes and practices, and that they comply with the law in all countries in which they conduct business. Suppliers are expected to foster a culture where employees and managers can communicate openly and raise concerns without fear of retaliation, intimidation, or harassment.

Planet's Supplier Code of Conduct (the "Supplier Code") sets forth Planet's commitment to integrity and compliance within its global supply chain. We expect all our suppliers to adhere to the Supplier Code and to ensure these requirements are met within their supply chain. Planet may visit (and/or have external monitors visit) supplier facilities, with or without notice, to assess compliance with the Supplier Code. Adherence to the requirements set forth in the Supplier Code will be considered in making sourcing decisions. Failure to comply with the Supplier Code may result in termination as a Planet supplier and possible legal action.



Labour and human rights

Planet respects and supports human rights principles as defined by the principles of the Universal Declaration of Human Rights (UDHR), the International Labour Organization's Declaration on Fundamental Principles and Rights at Work ("ILO Declaration") and the United Nations Global Compact and expect its suppliers to apply the same principals.

Fair treatment

Suppliers shall commit to a workplace free of harassment and unlawful discrimination against any individual on the basis of age, gender, gender identity, race, religion, national origin, sexual orientation, disability, or any other classification protected by applicable law. Examples of conduct that could be characterized as "harassment" include, without limitation, threatening or subjecting workers with harsh or inhumane treatment, sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, and unreasonable restrictions on entering or exiting company- provided facilities.

No involuntary labour or human trafficking

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labour. This includes the transportation, harbouring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

As part of this commitment to prohibiting human trafficking, Suppliers may not engage in any of the following conduct:



- Destroying, concealing, or confiscating identity or immigration documents;
- Using fraudulent recruiting tactics; or
- Charging employees unreasonable recruitment fees or providing inadequate housing based on local standards, laws, and directives.

No child labour

Child labour is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be 16 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. This Supplier Code does not prohibit participation in legitimate workplace apprenticeship programs.

Wages and benefits

Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition, workers shall be compensated for overtime hours at the rate required by applicable laws and regulations.

Subcontractor compliance

Suppliers agree that any workers supplied by subcontractors to work at the Supplier's facilities will be treated in a manner consistent with the principles set forth in this Supplier Code.

Indigenous rights

Indigenous rights (access to land and resources) shall be respected in accordance with national legislation to the greatest extent possible during material sourcing operations.

Health and safety

Suppliers shall comply with all applicable health, safety and laws and regulations. Suppliers should address the following matters in their health and safety programmes.

Occupational safety

Suppliers shall commit to the safety and health as well as the physical and mental wellbeing of their employees and shall ensure that required training of personnel has been completed prior to initiating any work activity. Suppliers should have or subscribe to a written safety and health program. Suppliers are responsible for addressing and controlling worker exposure to potential safety hazards (for example, in relation to manual handling, heavy lifting or use of machinery) in conformance with all applicable standards and/or regulations and utilizing suitable means, e.g., design, engineering and administrative controls, preventative maintenance, training, work procedures, and appropriate personal protective equipment.

Emergency preparedness

Suppliers shall have emergency plans and response procedures that implement all applicable laws and regulations regarding emergency preparedness, reporting and notification; evacuation procedures, training and drills; appropriate hazard detection and suppression equipment; and adequate exit facilities from suppliers' sites.

Occupational injury and illness

Suppliers shall have procedures and systems to manage, track and report occupational injuries and illnesses, and exposure of workers to chemical,



biological and physical agents. These procedures and systems shall implement all applicable laws and regulations, including, as applicable, provisions to (i) encourage worker reporting, (ii) classify and record injury and illness cases, (iii) investigate cases, and (iv) implement corrective actions.

Sanitation, food and housing

Suppliers shall provide workers with clean toilet facilities, access to potable water and if food preparation and storage facilities are provided these shall be sanitary. Worker dormitories provided by the Supplier or a third-party agency shall be clean and safe and provide adequate emergency egress, adequate heat, cooling and ventilation, reasonable personal space, and reasonable entry and exit privileges.

Environmental

Suppliers shall comply with all applicable sustainability and environmental laws and regulations when conducting business. Suppliers shall wherever possible, prioritise preventive and precautionary practices regarding the environmental and minimise, negative impacts on the environment matters. Suppliers shall:

- Obtain and keep current all required environmental permits and registrations;
- Reduce, control and/or eliminate wastewater, waste, pollution at the source and maximise recycling when possible;
- Reduce, control and/or eliminate air emissions of volatile chemicals, corrosives, particulates, aerosols, and combustion products;
- Conform to applicable labelling and warning requirements; and



- Identify, manage, store, move and handle chemical and hazardous substances in accordance with law;
- Use resources in an economical way, such as energy, water and material .

If and when possible, all suppliers should provide Environmental Product Declarations, and try to implement Environmental Process Standards, Environmental Product Standards, and Health-Based Product Standards.



Integrity and compliance

Conflicts of Interest

Suppliers are required to uphold Planet's reputation and 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 Planet if an actual or potential conflict of interest arises. This includes any situations of potential or apparent conflicts between Supplier's or its employees' personal interests and the interests of Planet.

Books and records

Suppliers are expected to create and maintain accurate books and records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. Regardless of format, all records made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on applicable retention requirements.

Business integrity

Suppliers shall comply with the laws and regulations of all applicable jurisdictions, including all applicable Anti-corruption laws. Suppliers may not solicit, give or receive commercial bribes or unlawful kickbacks and must also be careful to avoid even the appearance of such improper conduct. Suppliers will conduct their businesses without engaging in corrupt practices and will not

take advantage of anyone through unfair dealing practices. This means that suppliers should not misrepresent the quality, features or availability of their products or services. Suppliers also agree to maintain integrity, transparency and accuracy in corporate record-keeping.

Protection of Intellectual Property

Suppliers shall respect intellectual property rights and safeguard proprietary information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

Substance abuse

Suppliers shall have policies and procedures in place to ensure that employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications, whether prescription or non-prescription. In addition, suppliers will put in place policies and procedures that prohibit employees from using, possessing, transferring, or selling illegal drugs or alcohol or misused medication (whether prescription or non-prescription) while at work or while on the job.

Responsible sourcing of minerals

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten, and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available upon request.



Quality

Suppliers shall take due care to ensure their work product meets applicable quality standards. Suppliers shall put in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements. Suppliers shall develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

Privacy and information security

Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with,

including suppliers, customers, consumers, and employees. Suppliers shall protect confidential and proprietary information, including confidential and proprietary information of others and personal information, from unauthorized access, destruction, use, modification, and disclosure, through appropriate physical and electronics security procedures. Suppliers are to comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Management system

Suppliers shall adopt and implement a management system to comply with the principles set forth in this Supplier Code. Management Systems will vary from supplier to supplier based upon the size and scope of the business and risks. The management system will be designed to ensure:

- Compliance with applicable laws, regulations, and customer requirements;
- Conformance with this Supplier Code;
- Mitigation of risks, and a process to track, measure, and drive improvements in the management system.

The management system should contain the following elements at a minimum:

- **Company commitment and management** accountability through policy statements affirming the supplier's commitment to compliance and identifying a company representative(s) responsible for ensuring implementation of the management systems.



- **Risk assessment and risk management process** to identify risks associated with the supplier's operations.

As regulations continue to change and emerge, the supplier's management system should include a process to monitor and track regulatory activity that may impact its business and that of its customers relating to, but not limited to, environmental, restricted material usage, conflict minerals and hazardous waste.

- **Training programmes** for training managers and workers to implement the supplier's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.
- **Standards, audits and assessments** to ensure conformity to legal and regulatory requirements, the content of the Supplier Code and customer contractual requirements.
- **Corrective action process** for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.
- **Documentation and records** to ensure compliance with the principles of this Supplier Code.
- **A process to communicate supplier code requirements to suppliers** and monitor supplier compliance to the Supplier Code of Conduct.

Reporting concerns

If you become aware of a situation that may involve a violation of this Supplier Code, you have a responsibility to report it. Please note that failure to comply with this Supplier Code may result in termination as a Planet supplier and possible legal action.

You may make a report contacting any of our Ethics Officers (Global Head of Risk and Internal Control, Chief HR Officer, Head of Corporate Governance, and General Counsel) in writing using our Whistleblowing email address (planet-suppliers.ethics@planetsmartcity.com). You may make the report in any language, and it will remain anonymous if you wish.

Planet will treat all reports confidentially to the extent possible, consistent with the law, Company policy and the Company's need to conduct a thorough investigation. All reports will be Investigated promptly and thoroughly, consistent with applicable law and, upon the advice and approval of Planet Legal Department, may be reported to the appropriate authorities.





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