

TITLE:	Supplier Code of Conduct
POLICY OWNER:	Chief Financial Officer
ID / VERSION NUMBER:	ESG-0005 – Version 1
EFFECTIVE DATE:	April 1, 2024

PURPOSE:

The purpose of this Code of Conduct is to ensure that all Suppliers adhere to Calian’s ethical practices, standards of safe working conditions and fair treatment of all employees.

SCOPE:

This Code of Conduct applies to all suppliers, vendors, consultants, subcontractors, partners and any other third parties, including all employees, contractors, directors, officers, executives, management and any other parties conducting work on their behalf, (each a “**Supplier**” and collectively “**Suppliers**”) manufacturing or providing goods and/or services to Calian Group Ltd. or any of its subsidiaries (collectively “**Calian**”).

POLICY:

1. Calian has a set of ethical standards that all Suppliers are expected to comply with. Suppliers are expected to act in accordance with Calian’s values – integrity, teamwork, innovation and customer commitment.
2. All Suppliers must adhere to this Code of Conduct while conducting business with Calian.

Laws and Regulations

3. In providing goods and/or services to Calian, all Suppliers must ensure their business practices are conducted in accordance with all applicable laws and regulations in all locations in which they operate and provide complete and accurate information in relation to compliance with this Code of Conduct when requested by Calian. Calian will not do business with parties who are likely to harm its reputation. For example, Calian will avoid doing business with parties who continually violate the law. These laws include, but are not limited to, environmental, employment, health and safety, human rights, modern slavery and anti-trafficking and anti-corruption laws. All arrangements made by Suppliers with third parties must comply with this Code of Conduct and the law.

Health & Safety

4. Suppliers must provide a safe and healthy workplace environment for their personnel. This includes being compliant with all applicable laws and regulations related to workplace health and safety. Suppliers must ensure that adequate steps are in place to

prevent workplace accidents, such as providing information and training to their personnel.

Business Ethics

5. Suppliers must operate ethically in compliance with industry standards and will not engage in prohibited business practices, including, without limitation, corruption and/or bribery. Suppliers must avoid conflicts of interest and comply with all laws and regulations related to bribery, corruption, trade, data protection and privacy.
6. Calian will not do business with parties who perform any act contrary to Calian's Guide to Ethical Business Practices. All Suppliers must adhere to Calian's Guide to Ethical Business Practices while conducting business with Calian, a copy of which can be found in the Corporate Governance section of Calian's website (Calian.com).

Labour Standards

7. Calian fosters an environment of mutual respect, free from discrimination, violence and harassment through defined labour guidelines, policies and everyday cultural work practices. All Suppliers must foster a similar environment and agree not to tolerate discrimination, violence or harassment of any kind and adhere to applicable labour and human rights standards and legislation practice in accordance with this Code of Conduct. Any and all forms of discrimination, harassment, bullying or violence committed by a Supplier is strictly prohibited will not be tolerated. Suppliers shall treat all people with dignity and respect and shall not discriminate against any person based on any personal characteristic protected by applicable human rights legislation.
8. Calian will not do business with parties who perform any act contrary to Calian's Modern Slavery and Anti-Trafficking Policy. All Suppliers must adhere to Calian's Modern Slavery and Anti-Trafficking Policy while conducting business with Calian, a copy of which can be found in the Corporate Governance section of Calian's website (www.calian.com).

Supplier Environmental Responsibility

9. Suppliers must comply with all applicable environmental laws and regulations, and operate in an environmentally responsible manner while managing and minimizing negative environmental impacts of their operations, products and services. Suppliers are expected to implement an environmental management system and make reducing their carbon emissions in areas within their control a priority.

Negative Publicity

10. Suppliers must notify Calian immediately upon becoming aware of any negative publicity concerning the Supplier's business, including products or services that they provide to Calian that may cause negative or adverse publicity for Calian.

Counterfeit Parts

11. Suppliers must have effective processes in place to detect and minimize the risk of counterfeit parts and materials being introduced in the products that they sell.

Reporting Obligations

12. As part of its reporting obligations as a publicly traded company, Calian may have a requirement to report certain Supplier information to its customers and/or government authorities. If certain Supplier information is required, the Supplier will be informed of same and expected to maintain records of and report such information to Calian in an accurate and timely manner.

Acknowledgement

13. By conducting business with Calian, the Supplier acknowledges and confirms that they have read, understood and will comply with this Code of Conduct.

Compliance, Reporting and Enforcement

14. Violations or suspected violations of this Code of Conduct must be immediately reported to Calian. This Code of Conduct and its enforcement will be taken seriously, including the investigation of any breaches or alleged breaches. All parties subject to this Code of Conduct are expected to provide full cooperation into any investigation under this Code of Conduct.
15. Sanctions for breach of this Code of Conduct may be imposed by Calian, including, without limitation, termination of the business relationship and/or applicable contracts between the parties. Any report of a violation of this Code of Conduct made in good faith shall not be subject to any form of reprisal, provided the reporting party is not involved or implicated in the violation. If the reporting party is involved or implicated in the violation, the party's act of self-reporting the violation will be considered when determining an appropriate sanction.

Code of Conduct Assessment

16. Calian may periodically review and assess this Code of Conduct and changes or modifications may be implemented from time to time upon notice as Calian deems necessary.

CHANGE HISTORY			
Version	Date (dd mmm yy)	Author	Explanation
1	1 Apr 24	T. Dougall	Policy creation

