


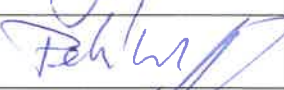

# BBH TSUCHIYA s.r.o.

CODE OF CONDUCT FOR SUPPLIERS  
S 11.1.001

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## CODE OF CONDUCT FOR SUPPLIERS

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**CONTENT:**

<b>I.</b>	<b>PROTECTION OF HUMAN RIGHTS, WOMEN'S RIGHTS.....</b>	<b>3</b>
<b>II.</b>	<b>PREVENTION OF DISCRIMINATION AND HARASSMENT, ETHICAL RECRUITMENT OF EMPLOYEES.....</b>	<b>3</b>
<b>III.</b>	<b>PROHIBITION OF CHILD LABOR.....</b>	<b>3</b>
<b>IV.</b>	<b>ENSURING FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING .....</b>	<b>3</b>
<b>V.</b>	<b>MEASURES AGAINST SLAVERY AND HUMAN TRAFFICKING.....</b>	<b>3</b>
<b>VI.</b>	<b>HUMAN RIGHTS .....</b>	<b>3</b>
<b>VII.</b>	<b>PROTECTION AGAINST EVICTION AND DEPRIVATION OF LAND .....</b>	<b>4</b>
<b>VIII.</b>	<b>USE OF PRIVATE AND PUBLIC SECURITY FORCES .....</b>	<b>4</b>
<b>IX.</b>	<b>PRINCIPLES OF COMMUNICATION.....</b>	<b>4</b>
<b>X.</b>	<b>BUSINESS ETHICS .....</b>	<b>4</b>
<b>XI.</b>	<b>COMPLIANCE WITH ENVIRONMENTAL, HEALTH AND SAFETY LEGISLATION.....</b>	<b>6</b>
<b>XII.</b>	<b>PRODUCT COMPLIANCE WITH ENVIRONMENTAL REGULATIONS .....</b>	<b>7</b>
<b>XIII.</b>	<b>CONFLICT MINERALS PROVISIONS (DODD-FRANK LAW REFORM, SEC1502).....</b>	<b>7</b>
<b>XIV.</b>	<b>DATA PROTECTION AND SECURITY.....</b>	<b>7</b>
<b>XV.</b>	<b>RIGHT TO MONITORING AND VERIFICATION .....</b>	<b>7</b>

BBH Tsuchiya s.r.o establishes a Code of Conduct, which sets out the rules of conduct for daily work, which must be observed by all its business partners and persons involved in business activities. BBH Tsuchiya s.r.o. ensures ethical business practices and these standards by establishing appropriate procedures and these procedures are applied to strengthen long-term and ongoing compliance with these ethical rules.

#### **I. Protection of human rights, women's rights**

BBH Tsuchiya s.r.o. supports the protection of internationally declared human rights, including minimum wages and working hours. Our business partners must undertake to respect the rights of employees and other stakeholders and to treat them according to the rules of the international community

#### **II. Prevention of discrimination and harassment, ethical recruitment of employees**

BBH Tsuchiya s.r.o. declares equal opportunities and equal treatment to be one of the guiding principles of all its activities. It further prohibits any form of discrimination. No employee may be discriminated against on the basis of their age, marital status, gender, sexual orientation, nationality, ethics, medical condition, social background, political, religious or personal beliefs.

Any overt or covert discrimination of employees, harassment, unethical recruitment of employees or their belittling of any kind, based on the mentioned aspects, are absolutely unacceptable, must be reported immediately to the superior and will be punished by the company in an adequate way.

We demand the same attitude from our business partners.

#### **III. Prohibition of child labor**

BBH Tsuchiya s.r.o. prohibits and abstains from any form of child labor within its organization.

#### **IV. Ensuring freedom of association and collective bargaining**

BBH Tsuchiya s.r.o. respects the right of its business partners to freely associate, organize and bargain collectively in accordance with applicable national law.

#### **V. Measures against slavery and human trafficking**

BBH Tsuchiya s.r.o. takes measures to prevent modern slavery in our organization and our supply chain.

#### **VI. Human rights**

BBH Tsuchiya s.r.o. respects and actively protects internationally recognized human rights, which are based on the UN Guiding Principles on Business and Human Rights. This includes the protection of local communities, indigenous peoples and human rights defenders.

We require the same approach from our business partners.

## **VII. Protection against eviction and deprivation of land**

BBH Tsuchiya s.r.o. undertakes to refrain from any illegal eviction. It shall also refrain from any illegal deprivation of land, forests and waters through development or other use.

We require the same approach from our business partners.

## **VIII. Use of private and public security forces**

BBH Tsuchiya s.r.o. undertakes to refrain from hiring or using private or public security forces if, as a result of inadequate instruction or control by the company, there is a risk of violating the prohibition of torture, cruel, inhuman or degrading treatment, damages to life or health or violation of freedom of association.

We require the same approach from our business partners

## **IX. Principles of communication**

During daily joint work, communication takes place on a horizontal and vertical level. The company is interested in ensuring that each of its business partners always has at its disposal such a summary of information that is necessary for it to perform its tasks safely and with quality.

It is the right of every business partner to respond to any information they deem incomplete, inaccurate or submitted late.

BBH Tsuchiya s.r.o. maintains an "open door" policy and at the same time calls on all its business partners to use it.

*If you have any questions, you can also contact: [bbh@bbhcz.com](mailto:bbh@bbhcz.com)*

## **X. Business ethics**

BBH Tsuchiya s.r.o. undertakes to adhere to these principles, which apply to all business partners and persons involved in business activities.

- **Wages and benefits** - in the area of remuneration, it is a matter of course that the guaranteed wage and statutory allowances are observed
- **Working hours** – the employer applies such a schedule of working hours that allows employees to better combine private and work life
- **Prohibition of corruption**, which is defined as the abuse of power for private gain.
- **Prohibition extortion**- demanding bribes is an act of solicitation or incitement to another persons for bribery.
- **Prohibition of bribery and money laundering** - offering or accepting any gift, loan, bribe, reward or other benefit to or from any person as an incentive to do something dishonest, illegal or breach of trust in the course of business.

- **The right to privacy** is defined as “No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honor and reputation. Everyone has the right to judicial protection against such interference or attacks.”
- **GDPR (Protection of private data)** - the aim is to protect all EU citizens from invasion of privacy and abuse personal data with the ever-increasing current use of data.
- **Financial responsibility** is the responsibility of the company to accurately record, maintain and report business documentation, including financial reports, reports to control bodies, if necessary. They are expected to be maintained in accordance with applicable laws and generally accepted accounting principles.
- **Protection of confidential information** The business partners must use and protect all information in an appropriate manner. They must ensure that sensitive data is properly collected, processed, saved and deleted.
- **Disclosure of information** relates to the company's responsibility to disclose financial and non-financial information in accordance with applicable regulations and general procedures.
- **Fair competition and antitrust policy** relate to encouraging businesses to comply with fair trade rules. Compliance with competition rules is a fundamental responsibility of companies.
- **Avoiding conflicts of interest** A conflict of interest arises when an individual or legal entity (either private or public) is in a position to use its professional or official means for personal or corporate enrichment.
- **Counterfeit parts:** companies are expected to develop, implement and maintain methods and processes appropriate to their products and services to minimize the risk of use counterfeit parts and materials in the delivered goods.
- **Intellectual property** refers to goods created by human intellectual activity, such as inventions, designs, and commercially used symbols, names, and pictorial materials. It is protected by law, for example through patents, copyrights and trademarks, which allow individuals to gain recognition or financial reward for their inventions or creations.
- **Export control measures and economic sanctions** apply to restrictions on the export or re-export of goods, software, services and technology, and may also apply to certain trade restrictions involving certain countries, territories, enterprises or entities and individuals for exports to third and dangerous countries.
- **Whistleblowing and protection against retaliation** - Employees who selflessly and in good faith report a suspected violation of this Code cannot be penalized.
- **Health and safety** with regard to the modern environment, the employer ensures the protection and safety of health at work to the maximum extent, both through environmental policy and the use of personal protective equipment and regular training.

## **XI. Compliance with environmental, health and safety legislation**

In BBH Tsuchiya s.r.o. we are in full compliance with the relevant national law on environmental protection, safety and health at work.

Business partners must comply with national legislation on occupational health and safety and fire safety. In addition, a process must be established to enable the continuous reduction of work-related health risks and the improvement of occupational health and safety and fire safety.

We have an effective environmental policy in place and comply with all applicable national laws, regulations and standards that protect the environment. We also demand this attitude from our business partners.

Business partners should in particular make efforts to minimize air emissions that pose a risk to the environment and health including greenhouse gas emissions. BBH Tsuchiya s.r.o. requires its business partners to ensure that their business model and strategy are aligned with the objectives of the transition to a sustainable economy. Our business partners provide information on overall energy consumption and carbon emissions (Scope 1, 2 and 3, in accordance with the GHG Protocol) upon request.

Avoiding waste, re-using resources, recycling as well as the safe, environmentally-friendly disposal of residual waste, chemicals and waste water must be taken into account in the development, production, product service life as well as in other activities.

Business partners are obliged to register, declare and, if applicable, obtain approval for substances pursuant to legal requirements in the respective markets.

**Renewable energy sources** - our business partners should support closed systems by promoting the use of sustainable, renewable resources while reducing waste and increasing reuse and recycling. Business partners should make reasonable efforts to increase their overall use of renewable energy annually.

**Water quality and consumption** sufficient quality water may not be ensured in the future, due to the changing climate, sources are disappearing. Therefore, everyone should consume only as much water as is really necessary.

**Air quality** everyone who produces emissions from production or other activities should have adequate filtration to ensure that the air is not polluted by various pollutants.

**Responsible management of chemicals** all chemicals should be stored in areas designated for this purpose. All packaging should be regularly inspected and legibly marked.

**Biodiversity** – our business partners should protect ecosystems, especially key biodiversity areas, that are affected by their activities.

**Deforestation** – our business partners are expected to protect natural ecosystems from deforestation, forest conversion or land conversion and to make best efforts to achieve zero net deforestation.

**Land use** - the rights and title to land and property of the individual, indigenous people and local communities shall be respected. All negotiations regarding land or property, including the use of and transfers of it, shall adhere to the principles of free, prior and informed consent, contract transparency and disclosure. Upon request, our business partners are required to demonstrate a legal right to use the land.

**Soil quality** - our business partners should monitor and control their impact on soil quality and prevent soil erosion, nutrient degradation, soil elevation and contamination.

**Animal protection** our business partners should respect the five animal rights formulated by the World Organization for Animal Health (OIE) (<https://www.woah.org/>) regarding animal welfare.

**Noise emissions** – our business partners should monitor and control industrial noise levels to avoid noise pollution.

**XII. Product compliance with environmental regulations**

BBH Tsuchiya s.r.o. provides products that fully comply with all applicable environmental compliance legislation. Such an approach is also expected of all business partners with whom we work together.

**XIII. Conflict Minerals Provisions (Dodd-Frank Law Reform, Sec1502)**

BBH Tsuchiya s.r.o. ensures to customers worldwide and throughout our supply chain that all its products, which contain electronic components that use a certain amount of gold, tin, tantalum and tungsten, do not originate in the Democratic Republic of the Congo, Central Sudan, Zambia, Angola, Republic of the Congo, Tanzania, Burundi, Rwanda or Uganda, or any other neighboring countries or countries subject to embargoes by the US sanctions authorities, European authorities or any national authority.

Because we must collect proof of the origin of all four of these metals, even if they do not contain such a critical mineral, we require our suppliers to provide a report on the deliveries made to BBH Tsuchiya s.r.o. given the origin of these four metals.

**XIV. Data protection and security**

The relationship with the customer is based on mutual trust and its preservation. All information about customers or business partners obtained in the course of business is subject to the obligation of confidentiality. Such information shall be treated as confidential. All information and data from customers and business partners must be protected by the supplier and its employees against unauthorized use, disclosure, alteration or destruction. These data may only be used for the purpose for which they were obtained. The protection of confidential data applies to all data carriers, regardless of their form.

**XV. Right to monitoring and verification**

Our business partners establish and maintain processes to identify and eliminate risks arising from non-compliance with this Code. BBH Tsuchiya s.r.o. may ask its business partners to confirm and verify compliance with this Code, insofar as the disclosure does not violate legal requirements.

**We also require this attitude, which is stated in the Code, from our business partners.**

.....  
Supplier (Name, position, date)