

SUPPLIER CODE OF BUSINESS ETHICS AND CONDUCT

Approved by members of the management board of Summus Capital OÜ

on 5th of June 2023

1. GENERAL

1.1. PURPOSE

Summus Capital OÜ (hereinafter the **Summus Capital** or the **Company**) is among others committed to non-mandatory Organisation for Economic Co-operation and Development (OECD) - Guidelines for multinational enterprises, UN International Bill of Human Rights and International Labour Organisation Declaration on Fundamental Principles and Rights at work.

The Supplier Code of Business Ethics and Conduct (hereinafter the **SCBEC**) is intended to govern the conduct of Summus Capital's suppliers, sub-contractors, financiers, advisors, intermediaries, agents and other business partners and service providers (hereinafter the **Suppliers**) when doing business with Summus Capital. Suppliers are expected to apply same principles as outlined in SCBEC to their suppliers, business partners and service providers.

1.2. COMPLIANCE WITH LAWS AND REGULATIONS

Suppliers shall abide by all applicable laws, rules and regulations in all jurisdictions in which they do operate. It is possible that local laws will occasionally be less stringent than those outline in this SCBEC. In those circumstances, Suppliers are required to abide by the SCBEC. Suppliers are required to, at the very least, abide by applicable local laws and regulations in case local laws are more stringent than SCBEC.

Suppliers are expected to notify the Company of any inconsistencies or conflicts between this SCBEC and any relevant laws or regulations.

1.3. TRANSPARENCY

Suppliers are expected to give Summus Capital or a third party authorised by the Company information pertinent to this SCBEC upon request in order to check whether Supplier complies with SCBEC. In order to ensure compliance with the SCBEC, Summus Capital expect its Suppliers to have adequate controls in place throughout their own operations.

1.4. CONSEQUENCES OF BREACH

Suppliers are expected to inform Summus Capital of any breaches or suspicions of breaches of this SCBEC and related policies. Suppliers are expected to take all appropriate measures to address and/or cure such breaches. Failure to cure the breach or comply with the SCBEC and related policies may result in suspending or termination the contractual relationships with Summus Capital.

2. HUMAN RIGHTS

Summus Capital expects its Suppliers to respect and support internationally proclaimed human rights. Suppliers shall ensure that they are not linked, causing or contributing to human rights infringements through their business activity. Suppliers shall comply with the UN International Bill of Human Rights.

3. LABOUR STANDARDS AND WORKING CONDITIONS

3.1. CHILD LABOUR

Suppliers shall not employ individuals below the minimum age permitted by local law. Suppliers must operate in compliance with local laws and International Labour Organisation standards regarding child labour. Suppliers shall not engage in or benefit from any form of child labour.

3.2. FORCED OR COMPULSORY LABOUR

Suppliers shall not engage in or benefit from any form of forced or compulsory labour. Forced or compulsory labour means work or service which is exacted from any person under the menace of any penalty or for which the said person has not offered himself voluntarily. Suppliers shall give employees the freedom to leave their work and terminate their employment contracts at any time while taking into account the legal notice requirements.

3.3. HEALTH AND SAFETY

At all locations where Supplier's employees perform their work, Suppliers must provide a safe and healthy working environment, welfare facilities and work equipment that is up to date and in conformity with international standards and national legislation. Equipment and tools must be in excellent working order and appropriate for the task at hand.

Supplier's employees must be given appropriate health and safety information and training, including information on the dangers to which they are exposed, necessary control measures and ways to minimize the risk of accidents and injuries. Regular safety inspections shall be conducted.

Suppliers shall comply with Summus Capital's Labour Standards Policy as well as any contractual terms with respect to labour conditions in its contract with the Company.

3.4. FREEDOM OF ASSOCIATION

Summus Capital expects its Suppliers to recognise and respect employees' right, without distinction, to freely exercise right of employees to organise, advance and defend their interests, as well as to engage in associations and collective bargaining. Suppliers are also expected to protect the employees from any action or other form of discrimination related to the exercise of their right to organise and engage in association activities and collective bargaining.

3.5. NON-DISCRIMINATION

Summus Capital expects its Suppliers to guarantee equality of opportunity and treatment in regard to employment and occupation, free from discrimination on the basis of race, gender, age, religion, political opinion, national or ethnic origin, sexual orientation and any other ground that may be recognised under the national law of the country or countries where the Supplier conducts its business.

Suppliers are expected to take all necessary precautions to ensure that neither they nor their parent, subsidiary, affiliate entity or their subcontractor is engaging any forms of discriminatory employment practices, including those related to hiring, promoting, training, remuneration or other benefits.

4. ENVIRONMENT

Suppliers shall comply with environmental laws and regulations. Suppliers are expected, whenever possible, encourage a precautionary approach to environmental issues, take steps to promote greater environmental responsibility, and promote adoption of environmentally friendly technologies and materials.

Suppliers are expected to minimise the negative impacts on environment of its activities by using resources, such as electricity and water, efficiently and minimising waste and emissions, for example such as carbon dioxide.

5. ANTI-BRIBERY AND ANTI-CORRUPTION

Suppliers shall adhere to the highest standards of moral and ethical conduct, respect local laws and not engage in any form of corruption, including extortion, fraud or bribery. Suppliers may not provide or accept any benefits or other means to gain an unfair or improper advantage.

Suppliers are expected to comply with Summus Capital's Anti-Bribery and Anti-Corruption Policy, as well as any contractual terms with respect to anti-corruption and anti-bribery in its contract with Summus Capital.

6. FAIR COMPETITION

Suppliers shall abide by all applicable competition laws and regulations and not be involved in price fixing, bid rigging, allocation of market or customers, sharing commercially sensitive information with competitors or similar illegal anti-competitive activities.

7. PERSONAL DATA AND CONFIDENTIAL INFORMATION

Suppliers shall guarantee that all processing's of personal data are in compliance with all applicable laws and regulations. Personal data and confidential information shall be protected and Suppliers' are expected to design and maintain processes to provide protections for personal data and confidential information.

Personal data and confidential information should only be used, accessed and disclosed as permitted by law or contracts with Summus Capital.

8. CONFLICT OF INTEREST

Suppliers are required to notify Summus Capital of any circumstances that might appear to be conflict of interests, as well as any Summus Capital employee, member of supervisory or management board under contract with Summus Capital who may have any type of interest in the Supplier's company or any kind of economic ties with the Supplier.

9. DATA PROTECTION & PRIVACY

Suppliers shall collect and use personal data in accordance with applicable laws and regulations. Suppliers shall ensure that data received from Summus Capital and others is collected for lawful purposes, processed within legal boundaries and protected against any unauthorised or illegal access by external parties.

10. REPORTING



Summus Capital expects its Suppliers' to report suspected breaches of the SCBEC and related policies by any Supplier or Summus Capital personnel.

Any breach or suspicion of breach of this SCBEC shall be reported to the management board of Summus Capital, via following e-mail: info@summus.ee or via designated place on www.summus.ee website.