

SUPPLIER CODE OF CONDUCT

We at Kinstellar¹ maintain the highest standards of integrity and professionalism and aim to create innovative, accountable and transparent partnerships with our suppliers. This Supplier Code of Conduct (“Code”) outlines the expected standards from any supplier doing business with us. We expect our suppliers to share and uphold these standards in their operations and supply chains.

This Code applies to all suppliers, their affiliated entities and subcontractors, who supply goods or services to Kinstellar (hereinafter referred as to “you”). As a condition of any contract held with Kinstellar, you are expected to comply with this Code and confirm such compliance of your operations.

1 Legal compliance

When supplying goods or services to Kinstellar, you undertake to comply with all legal and regulatory obligations that apply to you in any jurisdiction where you carry out your business or where we receive goods or services from you.

This includes ensuring that your employees and subcontractors are permitted to work or carry out their activity in relevant jurisdictions and that you accurately report and settle any tax or legal obligations.

2 Ethical business practice

You are expected to conduct activities in adherence with the principles of loyalty, integrity and fairness. You undertake to avoid unethical business practices, such as human rights abuses, money laundering, fraud, tax evasion, bribery, corruption and other improper payments, benefits or gifts.

Conflict of interest

You must refrain from entering into contracts that could potentially create or imply a conflict of interest between personal endeavours and your activities as supplier.

Anti-bribery and corruption

Kinstellar has an anti-corruption policy that applies to all of our personnel worldwide. We strictly prohibit involvement in any form of bribery or corruption, and have zero tolerance for violations, whether involving private individuals or public officials. Accepting, soliciting, agreeing to receive, promising, offering or giving bribes, or any other improper payments is strictly prohibited. When dealing with us, you undertake to avoid any direct or indirect involvement in bribery or corruption in any form. You must inform us about any suspicions or knowledge of any breaches of this clause.

Gifts and hospitality

You commit to operating transparently, and to not offering or accepting hospitality or gifts that could be perceived as creating an obligation or that may have adverse effect on our reputation. You should keep accurate records of all entertainment or gifts, whether offered, accepted or declined.

¹ Please refer to kinstellar.com for information on Kinstellar offices.

Fair competition

As part of your commitment to fair competition, you agree to comply with all applicable competition laws and regulations and avoid any form of anti-competitive behaviour or practices that undermine the principles of fair competition.

Data protection

When processing personal data, you agree to comply with all relevant data protection laws and regulations. You also commit to protect all confidential information against unauthorised access.

3 Labour and human rights

We expect that you will, in addition to complying with all applicable national and international laws, support and respect the protection of internationally recognised human rights, including those included in the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. You must make sure that you are not complicit in human rights abuses and you must support the elimination of all forms of modern slavery and forced and compulsory labour.

Health and Safety

We expect that you will take appropriate measures to ensure the health, safety and wellbeing of your staff including third parties and anyone that may be affected by your work activities including Kinstellar employees, visitors and the wider public. You must comply with all applicable health and safety laws, regulations and best practice guidelines and have suitable arrangements in place to manage health and safety risks. You must disclose any information that comes to your knowledge that demonstrates that any of your products or services breach internationally-accepted safety standards or guidelines.

Child labour

You must support an effective abolition of child labour by prohibiting the use of child labour throughout your supply chain and by employing only workers who meet or exceed the minimum legal working age in their country of origin.

Discrimination

Implementing inclusive recruitment practices, providing diversity training and fostering a culture of equality and respect can help eliminate discrimination in employment and occupation. You must support the elimination of discrimination in respect of employment and occupation and treat your employees and business partners in a fair and equal manner.

Freedom of association and collective bargaining

You should uphold the freedom of association and the effective recognition of the right to collective bargaining. Workers have the right to join or form trade unions without discrimination or intimidation. Where freedom of association and collective bargaining are restricted by law, workers should have the right to the development of parallel means of action.

4 Environment

You should comply with all relevant environmental laws and regulations and support a preventive approach to environmental challenges. You should set and actively pursue ambitious targets to

promote a greater environmental responsibility, limit your environmental impact, improve your environmental performance and develop and diffuse environmentally-friendly technologies.

5 Others

We recognise the different legal and cultural contexts in which our suppliers operate, but emphasise that this Code sets out basic standards of responsibility for you doing business with us. Where compliance with the Code is hindered by legal or regulatory constraints, you are expected to uphold the spirit of the Code as far as possible.

Subcontracting

Before subcontracting, you must obtain Kinstellar's written consent. You will only use subcontractors or other third parties who comply with all applicable laws and regulations and who adhere to the same (minimum) standards set forth in this Code.

Right to audit

At request, you must be able to demonstrate your commitment to this Code. We reserve the right to audit your compliance with this Code.

Reporting concerns

If you become aware of any violations of the Code by your own employees or by our employees, you should report them to us immediately. Reports should be sent to risk@kinstellar.com.