

# Deltalight

## Supplier Code of Conduct

### Labor Standards and Human Rights

At Deltalight, we are dedicated to upholding the highest standards, with a strong emphasis on the protection of internationally recognized human rights. We anticipate that our partners will actively endorse and uphold these essential rights. Our commitment extends to ensuring that our partners avoid any involvement in human rights abuses.

Should any violations arise, Deltalight is prepared to act promptly and firmly, applying significant consequences to address the issue.

### Child labor and young workers

At Deltalight, we firmly stand against the use of child labor, which we define as any work done by individuals under the age of 15, unless local legislation specifies a higher age for work or mandatory education. We are committed to ethical practices and ensure that our partners adhere to these principles.

For young workers under the age of 18, we take extra care to ensure their employment does not interfere with their education. They are employed only during hours that do not conflict with their schooling, as per compulsory education laws. Furthermore, we strictly prohibit night work for young workers and ensure they are not placed in hazardous or unsafe conditions. Our priority is to safeguard their well-being and support their healthy development, both physically and mentally.

### Forced and compulsory labor

Deltalight and its partners are unwavering in our commitment to ethical labor practices. We categorically reject all forms of forced, compulsory, or indentured labor, as well as any instances of modern slavery or human trafficking. Our stance is clear: every individual must engage in work voluntarily, without the duress of punishment, retaliation, or as a means of repaying debt.

In line with our values, we do not mandate that employees relinquish personal identification documents, such as government-issued IDs, passports, or work permits, as a condition of their employment. Our approach is grounded in transparency and a deep respect for the rights of each individual.

Every employee is provided with a written employment agreement or appointment letter, which they sign voluntarily. This document clearly outlines the terms of their employment, including the

provision that allows employees the freedom to terminate their employment, given the appropriate notice period.

At Deltalight, these principles are the cornerstone of our commitment to ensuring ethical and equitable treatment for everyone involved.

### **Non-discrimination**

Deltalight stands firmly against any form of unlawful harassment, discrimination, or retaliation. We are unwavering in our commitment to creating an environment of equality. Our partners are expected to actively promote equal opportunities and fair treatment in all aspects of employment and occupation. We do not condone discrimination based on race, age, skin color, gender, sexual orientation, religion, political opinion, union membership, national extraction, social origin, or any other status protected by the laws of the countries where we operate. Deltalight ensures that our practices align with the highest standards of integrity and respect for human rights.

### **Anti-harassment and abuse**

At Deltalight, we cherish a work environment where everyone feels safe and respected. We encourage our partners to cultivate a space where kindness and respect are the norm, and where every form of harassment and abuse is absent. We believe in empowering our employees, never resorting to intimidation or mistreatment of any kind. Deltalight is committed to creating a harmonious workplace for all.

### **Fair wages and benefits**

At Deltalight, we believe in treating our employees fairly. That means providing them with wages and benefits that align with national laws and collective agreements. When it comes to compensation, we aim for more than just the basics. The remuneration an employee receives for a standard working week should be enough to support a decent standard of living for both the worker and their family.

What does a decent standard of living entail? Well, it covers the essentials: food, water, housing, education, health care, transportation, and clothing. We also consider unexpected events, ensuring that our employees have a safety net. And to keep things transparent, we encourage our partners to provide clear information about wages—think payslips that break down how the wage is calculated. All of this should be part of the job contract or appointment letter.

### **Freedom of association and the right to collective bargaining**

At Deltalight, we believe in empowering our employees. That means granting them the right to freedom of association and collective bargaining. Our partners encourage employees to form, join, and organize trade unions of their choice. These unions can then collectively bargain on behalf of the employees with the company. We understand that in some cases,

the right to freedom of association might be restricted by law. In such situations, our partners explore alternative means to ensure that free association is still possible.

At Deltalight, we're all about collaboration and ensuring that everyone's voice is heard.

### **Working hours and documents**

At Deltalight, we take workplace standards seriously. Our partners are expected to comply with all applicable national laws and industry standards regarding working hours and public holidays. A regular workweek, excluding overtime, should not exceed 48 hours. Overtime is voluntary and compensated at a premium rate. Legally authorized employees are the only ones we employ.

We also ensure that employees receive at least one day off after six consecutive working days. Exceptions apply only when both national law permits longer work hours and there's a collective bargaining agreement allowing work time averaging.

At Deltalight, we're committed to fairness and respect for everyone.

## Health and Safety

At Deltalight, we're dedicated to ensuring that our workspaces are not just safe, but also promote the well-being of our employees. We take pride in the exceptional quality of our products and services. We expect our partners to be vigilant in monitoring and enhancing health and safety measures, adhering to the local health and safety regulations at their operational sites. Regular audits are essential to maintain our high standards, leading to necessary corrective and preventive measures.

Moreover, we believe in continuous improvement. That's why we encourage our partners to consistently elevate the quality of their offerings to Deltalight. It's this commitment to excellence that sets us apart.

### Workplace environment

At Deltalight, we prioritize the well-being of our employees. We ensure that our partners provide a work environment that is both safe and healthy, which extends to any housing conditions provided. This includes the essentials: clean drinking water, proper sanitation, clear emergency exits, and the necessary safety equipment. We also guarantee access to emergency medical care and workstations that are well-lit and fully equipped.

Safety is non-negotiable. That's why we make sure that all workplaces, machinery, equipment, and processes are secure and pose no risk to our employees' physical or mental health. We equip our team with the right training and gear to stay safe, including comprehensive drills for emergencies and evacuations.

At Deltalight, we're committed to maintaining a safe, healthy, and dignified workplace for everyone.

### Product quality and safety

At Deltalight, we value excellence. Our partners play a crucial role in delivering top-quality products and services. We expect every product and service they provide to meet not only the EU and local legal standards but also our stringent quality and safety requirements. If any concerns arise regarding product safety or quality, we encourage our partners to promptly report them to Deltalight.

Together, we're committed to maintaining the highest standards.

## Sustainability and environmental stewardship

At Deltalight, we're passionate about sustainability and environmental stewardship. We believe it's every business's duty to conduct operations sustainably and with the utmost care for our planet. It's essential that our activities, and those of our partners, leave a positive impact on the environment.

### Consider the environment

At Deltalight, we're committed to environmental stewardship. Our partners play a vital role in this mission. We expect them to have an effective environmental policy—one that reflects care for our planet and ensures compliance with all relevant laws and regulations in the countries where products or services are manufactured or delivered.

Prevention is key. Whenever possible, our partners should take a precautionary approach to environmental matters. Rather than waiting for issues to arise, they should proactively prevent them. Initiatives that promote greater environmental responsibility are encouraged, along with the adoption of environmentally friendly technologies that follow sound life cycle practices.

Together, we're making a positive impact on the environment.

### Sustainable operations

At Deltalight, we're dedicated to our corporate responsibility, especially when it comes to the environment. We count on our partners to embrace this commitment by adopting sustainable operational practices and technologies. It's all about being mindful of our environmental footprint. That means working together to minimize energy consumption and reduce air emissions, wastewater, and solid waste. We're not just striving for sustainability; we're living it.

### Energy and greenhouse gases

At Deltalight, we're proactive about our environmental impact. Our partners are expected to adhere to local energy and greenhouse gas regulations, keep a close eye on their annual energy and gas consumption, and actively seek out opportunities to incorporate renewable energy sources. It's all part of our commitment to a greener future.

### Water management

At Deltalight, we're passionate about sustainability and environmental stewardship. We believe it's every business's duty to conduct operations sustainably and with the utmost care for our planet. It's essential that our activities, and those of our partners, leave a positive impact on the environment.

## **Waste management**

At Deltalight, we're committed to environmental integrity. Our partners are expected to adhere to local waste regulations and actively engage in practices that prevent or minimize environmental harm from waste during the production process. It's about being responsible stewards of the environment every step of the way.

## **Hazardous substances**

At Deltalight, we prioritize safety and environmental responsibility. Our partners are expected to adhere to EU (REACH, RoHS) and local regulations concerning hazardous substances. Additionally, we encourage them to take proactive steps to minimize the use of such substances and mitigate any potential environmental risks related to leaks or spills. It's all about safeguarding our planet while delivering excellence.

## **Biodiversity**

At Deltalight, we're deeply committed to preserving the rich tapestry of biodiversity. Our partners are expected to follow local biodiversity regulations diligently. We also encourage them to actively reduce any negative impacts their production processes may have on local ecosystems, such as noise pollution or other forms of environmental harm that could affect local or endangered species. It's about working responsibly and harmoniously within our natural world.

## Fair business practices (Ethics)

Deltalight expects its partners to uphold the highest standards of fair business practices and ethics.

### Fraud, corruption and bribery

At Deltalight, integrity is at the core of our operations. We expect our partners to uphold the highest ethical standards, steering clear of any fraudulent practices, money laundering, corruption, bribery, or activities that could finance terrorism. Compliance with both local laws and international anti-corruption conventions is non-negotiable.

To maintain this integrity, our partners are required to conduct annual audits, ensuring their operations remain transparent and above board. It's not just about following rules—it's about fostering trust and respect in all our business dealings.

### Information security

At Deltalight, we take information security seriously. Our partners are expected to comply with all local laws and regulations related to safeguarding sensitive information. It's about ensuring that data remains confidential, protected, and handled responsibly.

### Whistle-blower procedure

At Deltalight, we value transparency and accountability. We encourage our partners to establish a robust whistle-blower procedure—one that provides a safe space for employees and stakeholders to report any wrongdoing. If there are concerns related to our Code of Conduct, we expect our partners to promptly address them. It's all about fostering trust and maintaining the highest standards.

### Responsible sourcing of raw materials

At Deltalight, we're dedicated to ethical sourcing and sustainability. We ensure that our raw materials are legally obtained and come from sustainable sources, always considering the well-being of people, animals, and the environment. We actively avoid materials that could contribute to armed conflicts, human rights abuses, or environmental harm. We count on our partners to share this commitment and support us in these efforts.

Our partners are expected to have a clear policy in place that reflects these fair business practices, aligning with our values and mission.

## Documentation, Monitoring and auditing

At Deltalight, we believe in transparency and accountability. To ensure compliance with our Supplier Code of Conduct, we kindly request that you maintain a record of all relevant 'documentation of proof.' Should the need arise, we appreciate your promptness in providing supporting documentation. In our commitment to sustainability, we have partnered with Worldfavor, the Sustainability Data Collector platform. Through this collaboration, we aim to empower our suppliers by helping them understand and embrace their own ESG (Environmental, Social, and Governance) ambitions. Together, we can contribute to a more sustainable world.

This Code of Conduct is an integral part of Deltalight's partner relationship management and evaluation procedure. Our monitoring process may include self-assessments, site visits, audits, and follow-up on remediation plans.

If a partner is unable to comply with the Deltalight Supplier Code of Conduct, they should promptly communicate this to Deltalight. Similarly, if unforeseen circumstances prevent the partner from meeting the Code temporarily or permanently, open communication is essential. Both parties can collaborate to establish an improvement plan, ensuring alignment with the Code within an agreed timeframe. Whenever possible, Deltalight reserves the right to request corrective actions and measures.

Deltalight maintains the right to disengage from any partner that fails to meet the requirements outlined in this Supplier Code of Conduct or cannot commit to an improvement plan.