

# Nelgo Industries, Inc.

## Code of Conduct

### Introduction

Nelgo Industries, Inc., including all of its subsidiaries, divisions, operating entities and authorized agents (together “Nelgo”) is a group with strong values. Whoever we may deal with, and wherever we may operate, we are committed to doing so lawfully, ethically and with integrity. This policy provides guidance on the fundamental values and principles and standards of behavior to which we expect our suppliers, business partners and other third parties to adhere to at all times.

### Child Labor

Nelgo Industries, Inc. shall not use child labor.

### Forced Labor

Nelgo Industries, Inc. shall not use any form of forced or compulsory labor.

### Respect and Dignity

Nelgo Industries, Inc. is committed to treating their workers with respect and dignity. Workers shall not be threatened with or subjected to any form of harassment or inhumane treatment, including corporal punishment, threats of violence, or any other form of physical, sexual, psychological or verbal coercion, harassment or abuse.

### Non-Discrimination

Nelgo Industries, Inc. shall not discriminate in their relationships with workers or other people, and shall not tolerate discrimination by their workers against others. Nelgo Industries, Inc. shall not treat any worker or other person better or worse because of their sex or sexual orientation, physical attributes or condition (including pregnancy), age, ethnic background, religious beliefs (or absence of such beliefs), or political alignment. Nelgo Industries, Inc. will comply with all applicable legislation and regulations relating to equal employment opportunities, non-discrimination and other employment-related matters.

### Freedom of Association

Nelgo Industries, Inc. shall comply with all applicable laws and regulations relating to worker’s rights to associate freely, join or no join trade unions, seek representation or join worker’s councils.

### Health and Safety

Nelgo Industries, Inc. shall ensure that its workers have a safe and healthy working environment in compliance with all applicable laws and regulations.

### Whistle Blowing

Nelgo Industries, Inc. must not tolerate retaliation in any form against any workers for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behavior which is in violation of any law or this Code of Conduct.

### **Compensation and Working Hours**

Nelgo Industries, Inc. shall comply with all applicable laws and regulations relating to wages, benefits and working hours.

### **Anti-Bribery and Corruption**

Nelgo Industries, Inc. shall be committed to operating lawfully, ethically and with integrity. Nelgo Industries, Inc. shall not tolerate, permit or engage in any form of bribery or corruption.

### **Data Privacy and Security**

Nelgo Industries, Inc. shall be committed to handling personal information or data responsibly and in compliance with relevant data protection and privacy laws.

### **Business Continuity**

Nelgo Industries, Inc. shall be prepared for any disruptions of its business (including but not limited to natural disasters, terrorism or software viruses).

### **Other Laws**

Nelgo Industries, Inc. shall comply with all laws applicable to their business.

### **Communication and Audit**

Nelgo Industries, Inc. shall communicate the principles set out in the Code of Conduct to all workers engaged in work for Nelgo.