

NYX and SUPPLIER(S)) Code of Conduct -Doc 042 Rev date 07/06/22 Approved by: VJK

NYX and SUPPLIER(S) shall ensure operations are being performed in a manner that is appropriate, as it applies to their ethical, legal, environmental, and social responsibilities. The following sustainability requirements apply to NYX and suppliers. Furthermore, suppliers must take appropriate steps to ensure compliance with these requirements by their own business partners and along the supply chain.

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- **Compliance with Local Laws and Regulations-** NYX and SUPPLIER(S) must adhere to the laws and regulations in the locality in which they reside. This includes all local, state, and federal laws/regulations in the country of origin, as well as the country of sale. For products brought into the United States, all federal standards must be met. International NYX AND SUPPLIER(S) should be Customs Trade – Partnership against Terrorism (C-TPAT) or country equivalent certified.
 - **A. Environmental Protection-** NYX takes responsibility for continually improving the environmental compatibility of its products and services as well as for reducing the demands made on natural resources throughout the life cycle. Suppliers must comply with all applicable environmental laws and regulations in all countries in which they operate.
 - **Environment Management system-**
 - Environment oriented management system is one of the main objectives of corporate policy. Therefore, NYX recommends all suppliers to have a suitable environmental management system in place. Suppliers are expected to improve the environmental performance of products and services by setting targets and monitoring environmental key performance indicators. Impacts on the environment and the health of employees must be avoided or kept to a minimum in all activities throughout the entire lifecycle of the products and services. Minimize air emissions that pose a risk to the environment and health, including greenhouse gas emissions. To improve the environmental key performance indicators for products and services, suppliers must provide for proactive management of the most important environmental indicators, including the reduction of greenhouse gas emissions along the entire supply chain.
 - Suppliers must, upon request, provide NYX with information on total energy consumption in MWh and CO₂ emissions in metric tons (scope 1, 2 and 3)
 - NYX will provide a suitable environment and take measures to reduce their energy usage and waste reduction.
 - **Environmental permits and reporting-** All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed. (For ex-Air regulation, water management and Energy consumption and greenhouse Gas emission if required)

- **Reduce, Reuse and Recycle-** NYX environmental objective is **Reduce, Reuse and Recycle**. Avoiding waste, reusing resources, recycling as well as the safe environmentally friendly disposal of waste, chemicals and wastewater considered in the development, production, product service life and subsequent end of life cycling.
- **Hazardous substances-** Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal
- **Solid Waste-** NYX and Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). And records should be available.
- **Material Restrictions-**NYX follows all applicable laws, regulation and customer requirements regarding the prohibition or restriction of specific substance in products and manufacturing including labelling for recycling and disposal through submission of IMDS. And also, same expected from their suppliers.
- **Quality and Safety-** NYX always follows the contractually agreed quality and safety criteria for all Products and services. And therefore, also expects from their suppliers.
- **B.-Human rights and labor rights of employees-**
 - NYX respects the internationally recognized human rights in all business relationships. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. Our business partners undertake to respect the rights of employees and other stakeholders and to treat them according to the rules of the international community
 - **Freely chosen employment-** Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract.
 - **Young workers-** Child labor is not to be used in any stage of manufacturing. The minimum age for admission to employment in accordance with state regulations must be observed. The term "child" refers to any person under the greater of
 - (i) the age of 15,
 - (ii) the minimum applicable legal age for completing compulsory education in a country, or
 - (iii) under the minimum legal age for employment in the country.NYX and Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. NYX and Suppliers shall ensure proper

management of student workers through proper maintenance of student records, rigorous due diligence of educational partner, and protection of students' rights in accordance with applicable laws and regulations. NYX and Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance and remediation according to the stricter of international standards or local standards shall be provided.

- **Working hours-** Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or uncommon circumstances. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days, defined as a rest period of at least 24 consecutive hours every seven days. Suppliers must keep employee working hour and pay records in accordance with local and national laws.
- **Wages and Benefits-** Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.
- **Human Treatment-** There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures are defined to support these requirements and communicated to workers.
- **Non-Discrimination/Non-Harassment-** NYX committed to a workplace free of harassment and unlawful discrimination. And not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111).
- **Freedom of Association-** In conformance with local law, NYX respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall

be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, Intimidation, or harassment.

- **C. Occupational health, safety, and fire safety –**

- NYX and suppliers must comply with the national occupational health, safety, and fire safety legislation. All occupational health and safety measures shall not involve any expenditure for the employees (ILO Convention 155). Furthermore, a process enabling the continuous reduction of work-related health hazards and improvement of occupational health, safety and fire safety must be established.
1. Employees are informed of identified hazards and the associated preventive and corrective measures put in place through emergency preparedness and response procedure to minimize hazards. This information provided during the hiring process.
 2. Sufficient employee training conducted on the prevention of work-related health disorders, the prevention of accidents at work, first aid, chemicals management and fire safety.
 3. Provided suitable protective equipment and protective clothing free of charge.
 4. Installed appropriate fire protection equipment such as fire detectors and fire extinguishers.
 5. Accidents and incident are tracked and reviewed under monthly management review
 6. All Chemicals received and verified labelled properly to the global Harmonized system of classification and Labelling. And chemicals stored in line with national regulations.
 7. Training provided on appropriate emergency plans, fire protection equipment and first aid material for medical first assistance in the event of an accident and organize adequate transport for the further treatment of casualties.
 8. Appropriate Emergency contact list is part of the contingency plan and part of the emergency response plan. Evacuation plan is posted in the plant for escape routes and emergency assembly points which are marked with sufficient signage.
 9. First aid provided, if an accident at work occurs.
 10. Emergency drills executed at least annually.
 11. Reasonable steps also taken to remove pregnant women from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women.
- **Occupational injury and illness**-Supervisor's complete the Injury form to report any injury or illness happened in the plant. Necessary medical treatment is provided, Injury case is investigated, and corrective actions are taken to eliminate their cause.

- **Industrial Hygiene**-SDS sheets evaluated for all chemicals. and all chemicals are stored as per the designated location in the plant. Appropriate personal protective equipment and training provided to the exposed workers,
- **Machine safeguarding**- Physical guards, interlocks, and barriers are provided and properly maintained where machinery presents an injury hazard to workers.
- **Sanitation, Food, and Housing**- Workers are to be provided with ready access to clean toilet facilities, potable water, and sanitary food storage, eating facilities, adequate lighting and heat and ventilation.
- **Health and Safety Communication**- Health and safety related information clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.
- **D Ethics-(“Whistle blowing”)**
 - To meet social responsibilities and to achieve success in the marketplace, NYX have a **zero-tolerance policy** to prohibit all forms of bribery, corruption, extortion and embezzlement.
 - **No proper advantage**-Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted.
 - **Disclosure of Information**-All business dealings should be transparently performed and accurately reflected on the Supplier’s business books and records. Information regarding Supplier’s labor, health, and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
 - **Intellectual Property**-NYX and Suppliers shall respect and safeguard intellectual property rights and proprietary or confidential customer information and conduct any material transfer in a manner that protects intellectual property rights.
 - **Fair Business, Advertising and Competition**-NYX and Suppliers shall understand and comply with all applicable fair business, advertising and competition laws including fair trading and competition laws in the jurisdictions in which they operate.
 - **Responsible Sourcing of Minerals**-NYX Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the cobalt, tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of

Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework. Suppliers must comply with conflict mineral policy, located on our NYX website.

- **Privacy-NYX** and Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
- **E Management Systems-**
 - NYX and Suppliers shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure:
 - (a) compliance with applicable laws, regulations and customer requirements related to the NYX's and Supplier's operations and products.
 - (b) conformance with this Code.
 - and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. The management system should contain the following elements:
 - **Company Commitment-**Corporate social and environmental responsibility policy statements affirming NYX's and Supplier's commitment to compliance and continual improvement, endorsed by executive management, and posted in the facility in the local language
 - **Management Accountability and Responsibility-** NYX and Supplier clearly identifies senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.
 - **Legal and Customer Requirements-** A process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.
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 - **Risk Assessment and Risk Management-** NYX have a process to identify the legal compliance, environmental, health and safety labor practices and ethics risks associated with its operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.
 - **Improvement Objectives-** Written performance objectives, targets and implementation plan to improve the company and Supplier's social, environmental, and health and safety performance, including a periodic assessment of Supplier's performance in achieving those objectives.

- **Training-** Programs for training managers and workers to implement company policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.
- **Communication -**
Process for communicating clear and accurate information about company's policies, practices, expectations, and performance to workers, suppliers, and customers
- **Worker Feedback, Participation and Grievance-** Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation. Suppliers must periodically provide workers with information on all grievance procedures. No retaliation against workers for raising workplace concerns may be tolerated, including personal attacks, intimidation, or other threats against workers.
- **Audits and Assessments-** Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility. This is done through SAQ 4.0 upon customer request.
- **Corrective Action Process-**
A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.
- **Documentation and Records-** Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
- **Supplier Responsibility -**
A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

Revision History

Revision Date	Revision #	Description of changes
07/06/22	A	Changes are made in NYX and supplier code of conduct based on the Customer requirements and document number assigned