



**SUPCON**

# Overseas Channel Partner Code of Conduct

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# Introduction to the Code of Conduct

SUPCON is committed to conducting business according to high ethical standards and seeks Overseas Channel Partners who share our principles of integrity, respect, and responsibility. These principles guide all aspects of SUPCON's overseas business and are expected to be upheld by our partners.

This Overseas Channel Partner Code of Conduct ("Code") sets standards and responsibilities for all Overseas Channel Partners in areas such as legal and ethical business practices, labor and human rights, health and safety, and environmental responsibility and sustainability. The Code is not exhaustive and does not replace any legal or contractual obligations.





## Where the Code of Conduct Applies

Overseas Channel Partner (“OCP”) refers to any third party who interacts with SUPCON’s customers, government officials, or government entities in overseas markets on SUPCON’s behalf for sales and marketing purposes. OCP include, for example, overseas distributors, agents, and resellers. This Code applies to all employees and representatives of OCP. OCP should also encourage their subcontractors or associated third parties to follow these standards. Our references to SUPCON in this Code include SUPCON International Business Pte. Ltd. and its overseas affiliates. For purposes of this Code, the term “SUPCON” and such terms as “our” and “we” may refer to one or more overseas affiliates or departments of SUPCON International Business Pte. Ltd.. These terms are used for convenience only and are not intended as a precise designation of any of SUPCON’s separate overseas affiliates or departments.

# Legal And Ethical Business Practices

A modern office interior featuring a long wooden conference table surrounded by red chairs. The room has large windows on the left, a concrete ceiling with exposed pipes and ductwork, and two black pendant lights hanging over the table. The floor is a light-colored, polished surface.

01

# Legal And Ethical Business Practices

OCP are expected to operate responsibly and ethically, consistently demonstrating integrity across all facets of their business. This involves maintaining high standards of honesty, transparency, and fairness, while ensuring full compliance with all applicable laws and regulations.

## 1. Compliance With Laws And The Code

OCP must comply with this Code when conducting business with or on behalf of SUPCON, and with all applicable laws and regulations in the jurisdictions where they operate. If local laws are less restrictive than this Code, the Code shall apply. If local laws are more restrictive, local laws shall be followed.

OCP must cooperate with investigating government agencies as required by law, providing reasonable access to facilities and personnel. Partners should notify relevant authorities if credible information arises indicating that any worker, contractor, or subcontractor has violated applicable laws.

## 2. Anti-Bribery And Anti-Corruption

OCP must conduct all business honestly, ethically, and in compliance with all applicable anti-corruption laws, including but not limited to the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, local anti-bribery laws, and relevant international conventions such as the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

OCP must not engage in any form of corruption, bribery, extortion, fraud, embezzlement, or kickbacks. Partners must not, directly or through any third party, offer, give, promise, or accept anything of value—such as money, gifts, favors, travel, meals, charitable or political donations, loans, or job opportunities—to improperly obtain or retain business or any business advantage. Facilitation payments are strictly prohibited.

Any business courtesies extended to our employees or representatives must be infrequent, of nominal value, and compliant with applicable laws and regulations. OCP must promptly report any suspected or actual violations.

### 3. Conflict Of Interests

OCP must avoid any actual or potential conflicts of interest with SUPCON. A “conflict of interest” arises when a personal interest, activity, or relationship of OCP or its employees could, or appears to, interfere with their ability to act in the best interests of SUPCON.

OCP must promptly disclose any actual or potential conflicts of interest before or during the business relationship. OCP must cooperate with us to take appropriate measures to avoid or eliminate any possible impact of such conflicts on the business relationship.

### 4. Accurate Business Records

OCP must maintain complete, accurate, and transparent records of all business dealings with SUPCON. These records must reflect actual transactions and payments, and comply with all applicable laws, accounting standards, tax regulations, and record retention requirements.

Records must be legible, truthful, and available for

inspection or audit when required. OCP must not falsify, omit, or misrepresent any information in financial or business records.

### 5. Fair Competition

OCP must conduct business through fair and honest competition and comply with all applicable antitrust and competition laws and regulations worldwide.

OCP shall not engage in any activity that harms or reduces competition, including but not limited to:

- Fixing, adjusting, or controlling prices;
- Dividing or allocating customers or markets;
- Limiting the sale of products, services, or solutions;
- Coordinating with competitors on bids, pricing, or other competitively sensitive matters.

OCP must not share competitively sensitive information, or enter into formal or informal agreements with competitors that could restrict free and fair competition.

### 6. Trade Compliance

OCP must comply with all applicable international trade laws and regulations, including export controls, import regulations, customs, trade embargoes, and economic sanctions. Products, software, or technology licensed, sold, or transferred under any agreement must not be exported, re-exported, transferred, or used in

violation of applicable laws, or for unlawful, military, or prohibited purposes.

OCP must obtain all required licenses or authorizations prior to any export, re-export, or transfer of controlled products, software, or technology. Resale of products to any third party must be conducted under the same compliance obligations.

OCP must cooperate with SUPCON in monitoring and verifying compliance, promptly report any concerns or potential violations, and take all reasonable measures to mitigate compliance risks. SUPCON reserves the right to take appropriate action, including suspending services or terminating agreements, if compliance risks are identified.

## 7. Anti-Money Laundering

OCP must not, directly or indirectly, facilitate the concealment or misrepresentation of the origin of funds obtained from unlawful activities. OCP must conduct business only with individuals or entities engaged in legitimate commercial activities, using funds from legitimate sources.

OCP must comply with all applicable anti-money laundering and counter-terrorism financing laws in the jurisdictions where they operate and maintain appropriate programs and procedures to prevent violations of such laws. OCP are expected to promptly report any suspicious transactions or concerns related to money laundering or terrorist

financing to SUPCON.

## 8. Insider Trading

OCP must comply with all applicable laws and regulations governing insider trading. OCP must not use any material non-public information obtained through their business relationship with SUPCON ("Insider Information") for personal gain or for the benefit of any other person. Partners must also not disclose Insider Information to others or make recommendations to trade or invest based on such information. "Material non-public information" generally refers to information that a reasonable investor would consider important in making an investment decision and that has not been publicly disclosed. OCP are expected to establish internal policies and controls to prevent insider trading within their organization.

## 9. Intellectual Property

OCP must respect and protect the intellectual property (IP) rights of SUPCON and its users, including but not limited to patents, copyrights, trademarks, trade secrets, know-how, and source code. OCP must not infringe, misuse, or disclose such IP without proper authorization. Any suspected or actual infringement must be reported promptly to SUPCON.

## 10. Confidential Information

OCP must maintain the confidentiality of all non-public information obtained through their business relationship with SUPCON. This includes business strategies, financial data, product plans, technical specifications, customer information, and other proprietary information. OCP may only use such confidential information for the purposes authorized by SUPCON. Unauthorized disclosure or use is strictly prohibited.

## 11. Data Protection And Cybersecurity

OCP must comply with all applicable data protection, privacy, and cybersecurity laws and regulations in the jurisdictions where they operate. OCP shall implement appropriate technical and organizational measures to safeguard personal data and company information against unauthorized access, disclosure, alteration, or loss. Any data breaches or suspected security incidents must be reported to SUPCON promptly.

## 12. Product And Service Safety

OCP must ensure that all products, hardware, software, and solutions provided are safe, reliable, and compliant with applicable laws and regulations. OCP should follow relevant product

standards and internal quality requirements, and promptly report any safety incidents, defects, or risks to SUPCON.



# Labour And Human Rights

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# Labour And Human Rights

OCP are expected to treat their employees with the utmost dignity and respect, and in accordance with applicable labor and employment laws, regulations, and the standards set forth in this Code.

## 1. Child Labor And Young Workers

OCP must not employ child labor and must ensure compliance with all applicable laws regarding minimum working age. Workers under the age of 18, where legally permitted to work, must not be assigned hazardous tasks. Employment of young workers should also respect legal requirements on working hours, fair compensation, and health and safety.

## 2. Freely Chosen Employment

OCP must ensure that all employment is freely chosen. They shall not engage in or support forced, bonded, or indentured labor, involuntary prison labor, human trafficking, or any form of modern slavery. Workers must not be required to pay for employment and must have the right to freely terminate their employment in accordance with local laws. OCP should provide employees

with clear employment terms and ensure that management understands and enforces this commitment.

## 3. Non-Discrimination, Diversity And Inclusion

OCP must provide a workplace free from discrimination and harassment based on race, color, age, sex, religion, national or ethnic origin, marital status, sexual orientation, gender identity or expression, disability, pregnancy, or any other characteristic protected by applicable laws. OCP should promote diversity, equity, and inclusion, and ensure fair recruitment, training, and promotion practices.

## 4. Fair Treatment And Freedom Of Association

OCP must treat all employees with dignity and respect. Harassment, coercion, abuse, or



exploitative behavior is strictly prohibited. Employees must have the right to freely associate, join or refrain from joining unions, seek representation, and engage in collective discussions about their terms and conditions of work, in accordance with local laws.

## 5. Working Hours, Wage And Benefits

OCP must comply with all applicable laws on working hours, overtime, and rest periods. Employees must receive at least the legally mandated minimum wage and benefits, including paid leave, social security, and other statutory entitlements. OCP should communicate clearly with employees about their compensation and ensure a work environment that prevents fatigue, stress, or an unhealthy work-life balance.

## 6. Respect Of Local Communities

OCP shall operate in a manner that respects the rights and well-being of local communities, including their right to a clean and healthy environment.

# Health And Safety

03

# Health And Safety

OCP must commit to creating a healthy and safe work environment and strive for high standards of health and safety for the continuous improvement of working conditions.

## 1. Safe And Healthy Working Environment

OCP must provide a safe and healthy workplace in compliance with all applicable laws, regulations, and recognized international standards. OCP should proactively identify, assess, and manage potential occupational health and safety risks, taking measures to prevent, reduce, or eliminate hazards. Facilities and equipment should support employee safety, health, and well-being.

## 2. Training, Communication And Information

OCP must provide employees with appropriate and regular training on health, safety, and workplace hazards, including chemical, biological, or physical risks where relevant. Safety information and notices should be accessible to employees as required by law or SUPCON policies.

## 3. Incident Management And Corrective Actions

OCP should implement procedures to track, report, and manage workplace incidents, injuries, or illnesses. Corrective actions should aim to mitigate risks, provide necessary medical support, and facilitate employees' safe return to work.

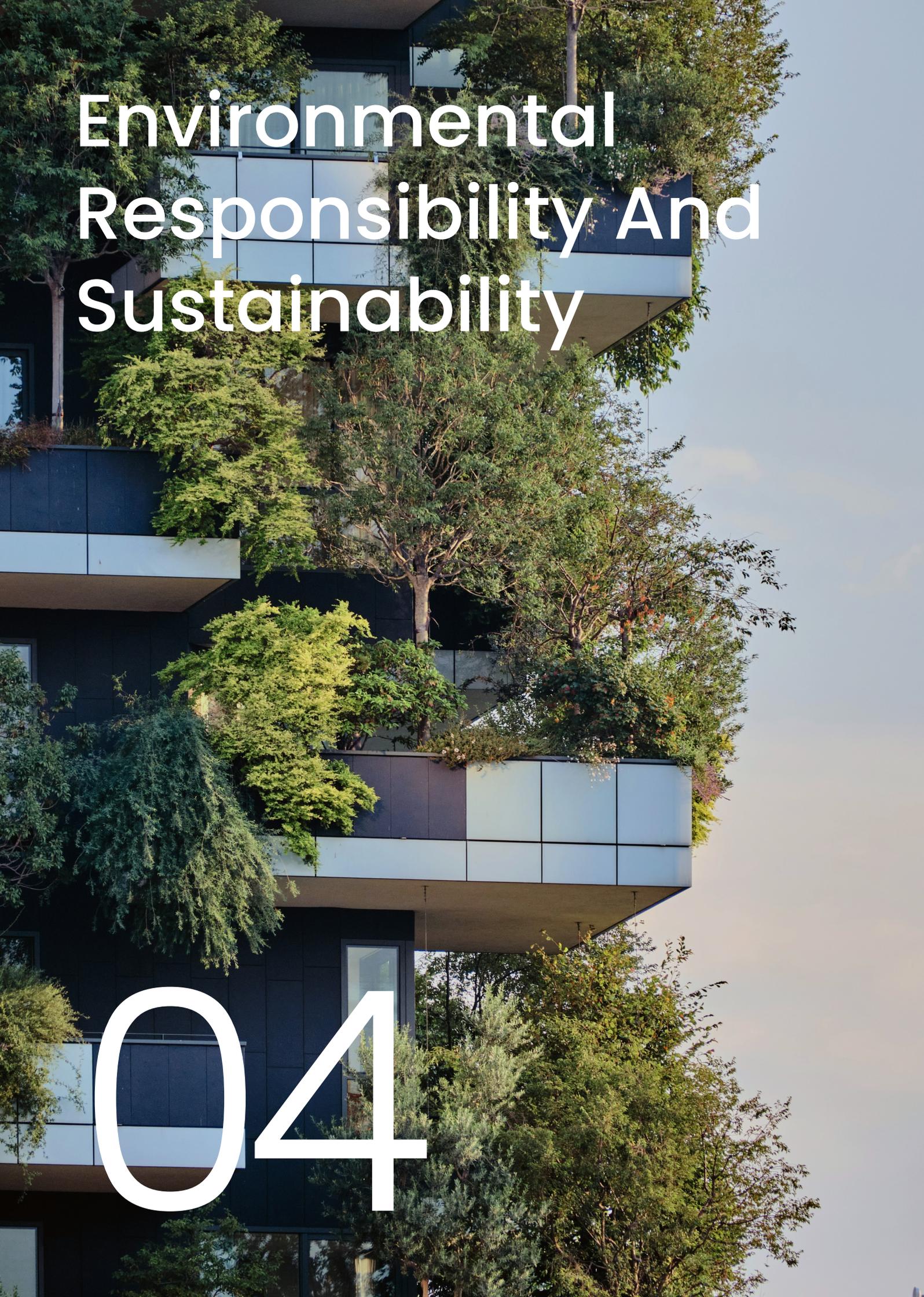
## 4. Emergency Preparedness And Response

OCP should identify potential emergency situations, develop response plans, and train employees to execute these plans effectively. Emergency preparedness should minimize harm to life, the environment, and property.

## 5. Employee Well-Being

Partners are encouraged to promote a culture of safety and well-being, including initiatives that support the physical and mental health of employees, contractors, and subcontractors.



A modern building with a lush green facade of trees and plants. The building features dark panels and large windows, with various types of trees and shrubs growing on the balconies and facade. The sky is a clear, light blue.

# Environmental Responsibility And Sustainability

# 04

# Environmental Responsibility And Sustainability

OCP should operate responsibly to minimize environmental impact, conserve resources, reduce emissions, protect biodiversity and water, and manage hazardous materials safely.

## 1. Compliance With Environmental Laws

OCP must comply with all applicable environmental laws, regulations, and standards. OCP should obtain and maintain any required environmental permits, licenses, and registrations, and follow operational and reporting requirements.

## 2. Waste, Emissions And Hazardous Materials

OCP shall manage, monitor, and treat any waste, wastewater, or emissions to minimize impacts on human health and the environment. Hazardous materials and products must be handled, stored, transported, recycled, or disposed of safely and responsibly.

## 3. Pollution Prevention And Resource Efficiency

OCP should take measures to reduce emissions, discharges, and waste generation. They should use natural resources efficiently, conserve water and energy, favor sustainable sources, and promote reuse and recycling where possible.

## 4. Climate Change And Environmental Performance

OCP are encouraged to monitor and reduce greenhouse gas emissions, identify environmental risks and opportunities, and continually improve their environmental performance. OCP should also encourage their suppliers to adopt similar practices.



## 5. Biodiversity And Local Impact

OCP should consider their impact on biodiversity and local communities and take reasonable steps to minimize ecological footprints and prevent accidental spills or releases that could harm the environment or surrounding communities.

# Implementation, Monitoring, And Reporting

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# Implementation, Monitoring, And Reporting

## 1. Consequences Of Noncompliance

OCP that violate this Code risk termination of their business relationship with SUPCON. Such violations may also constitute a breach of contractual obligations and could result in legal consequences under applicable law.

## 2. Monitoring And Audits

SUPCON monitors OCP compliance through information requests, assessments, and audits. Audits may be conducted by SUPCON or a third party appointed for that purpose. OCP are expected to cooperate fully with audits, information requests, certifications, or inquiries as required. Audit procedures will be agreed upon with partners in advance.

## 3. Communication Of Expectations

OCP must communicate the expectations and requirements of this Code to all relevant personnel, including employees, managers, agents, subcontractors, or other third parties acting on their behalf in conducting activities related to SUPCON.

## 4. Reporting Concerns

OCP should promptly report any suspected violations of this Code, legal requirements, or unethical conduct. Reporting channels include confidential company tools or direct communication with designated company representatives. Reports may be made anonymously where permitted by law, though identifying oneself is encouraged to facilitate effective communication and resolution. All reports will be treated seriously, and retaliation against reporters is strictly prohibited.



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