

Supplier Principles

Responsible behaviour is crucial to how we do business at SGA Technologies Limited and/or SGA Poole Limited. We are committed to achieving high ethical standards, by managing operations responsibly and conducting business in an ethical way.

SGA Technologies Limited and/or SGA Poole Limited relationships with its suppliers are a pivotal part of this commitment. To clarify what we expect from our suppliers and their supply chains, we have developed these Supplier Principles – Guidance for Responsible Business.

What do we expect from our Suppliers?

Code of Conduct

SGA Technologies Limited and/or SGA Poole Limited Code of Conduct is central to our responsible business environment. We encourage our suppliers to implement and adhere to their own similar written code of conduct. In addition, correspondent with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with applicable laws and regulations.

International Trade Compliance

We expect our suppliers to conduct business in compliance with all applicable laws and regulations governing: – export, re-export, import of products, technical data and services; and – economic sanctions and embargoes.

Anti-Corruption

We expect our suppliers to comply with all relevant laws and regulations regarding anti-corruption including, where applicable, the Foreign Corrupt Practices Act and the UK Bribery Act. SGA Technologies Limited and/or SGA Poole Limited has a zero tolerance for any corrupt activity.

Bribery

We will not offer, give, or receive any payment, benefit or gift that may be construed as a bribe, for any business purpose whether directly or through a third party. SGA Technologies Limited and/or SGA Poole Limited expects its suppliers to be similarly intolerant of corrupt activity and to have appropriate and adequate procedures to prevent such activity from taking place.

We expect our suppliers to ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, does not violate the rules and standards of the recipient's organization, and is consistent with all reasonable market terms and conditions.

Counterfeit Materials

We expect our suppliers to develop, implement and maintain methods and processes appropriate to their products to prevent counterfeit parts and materials being delivered. Effective processes should be in place to detect, report and quarantine counterfeit parts and materials and prevent such parts re-entering the supply chain. We expect our suppliers to only use materials from Original Manufacturers or their authorized sources, and to comply with applicable laws, regulations, and industry 'best practice' protocols when conducting business with SGA Technologies Limited and/or SGA Poole Limited.

Counterfeit part prevention processes should consider:

- i) training of appropriate persons in the awareness and prevention of counterfeit parts and material;
- ii) application of a parts obsolescence monitoring program;
- iii) controls for acquiring externally provided product from original or authorized manufacturers, authorized distributors, or other approved sources;
- iv) requirements for assuring traceability of parts, material and components to their original or authorized manufacturers;
- v) verification and test methodologies to detect counterfeit parts and material;
- vi) monitoring of counterfeit parts and materials reporting from external sources;
- vii) quarantine and reporting of suspect or detected counterfeit parts and materials.

Conflict Minerals

We expect our suppliers to conduct appropriate due diligence, where reasonably feasible, to identify, report and take remedial action, if their products contain conflict minerals (tin, tantalum, gold and tungsten, etc.) that are used to finance conflict in the Democratic Republic of Congo, Russia and adjoining countries, or other conflict-affected or high-risk areas. Where applicable local laws and regulations exist in the jurisdiction in which the supplier operates, we expect our suppliers to comply with such laws and regulations.

