

## Code of Conduct

This Code of Conduct applies to all organisations with which OTIV maintains business relationships, including, but not limited to, licensees, suppliers, subcontractors, contractors, partners and customers. All such organisations are expected to comply with this Code and to uphold standards equivalent to those set out in OTIV's **Social Responsibility & Human Rights Policy Commitment**.

---

### General Principles

The Licensee/Supplier shall comply with all applicable laws and regulations relevant to its operations and to the use of OTIV technologies, demonstrating scrupulous respect for the law in every jurisdiction in which it operates.

The Licensee/Supplier shall conduct its business with respect for human rights, public freedoms and fundamental rights, and shall uphold the principles of the Universal Declaration of Human Rights and the United Nations Global Compact, including those related to labour rights, environmental responsibility and the fight against corruption.

The Licensee/Supplier shall also uphold the principles of equal treatment and non-discrimination, respect diversity, and promote inclusion in the workplace.

---

### Business Ethics and Integrity

OTIV expects the Licensee/Supplier to operate with integrity and to work against corruption in all its forms. The Licensee/Supplier assumes the obligation:

- to implement a **zero-tolerance policy** towards corruption, bribery, kickbacks, extortion, embezzlement and any other unethical practices;
  - to avoid any unreasonable business entertainment or hospitality intended to improperly influence decisions involving OTIV representatives or auditors;
  - to identify and report any potential **conflict of interest** related to OTIV's business and actively take steps to avoid such conflicts;
  - to safeguard confidential information and intellectual property related to OTIV's business, unless disclosure is expressly authorised by OTIV.
-

## Human Rights

This Code reflects the principles of the UN Guiding Principles on Business and Human Rights and confirms OTIV's and its partners' responsibility to respect human rights throughout their operations and value chains. The Licensee/Supplier assumes the obligation:

- to avoid causing or contributing to adverse human-rights impacts and to prevent or mitigate such impacts where they occur;
  - to respect public freedoms and fundamental rights, including human dignity and personal integrity;
  - to maintain an appropriate policy commitment to human-rights protection;
  - to conduct human-rights due diligence to identify, prevent, mitigate and account for potential or actual impacts;
  - to have processes in place to enable the remediation of adverse human-rights impacts that they cause or to which they contribute.
  - The Licensee/Supplier shall strictly prohibit child labour, modern slavery, forced labour, human trafficking and all related exploitative practices.
- 

## Labour Standards

The Licensee/Supplier shall adhere to the fundamental principles of the International Labour Organization (ILO), including:

- respect for workers' rights to freedom of association and the right to collective bargaining;
  - prohibition of forced, bonded or compulsory labour, including the withholding of identity documents;
  - prohibition of child labour in line with ILO Convention 138 and protection of young workers;
  - fair and voluntary employment practices in all recruitment activities;
  - provision of written employment contracts in a language understood by the worker;
  - compliance with applicable labour laws and transparent communication of workers' legal rights;
  - payment of wages and benefits at least equal to the legal minimum salary, and compensation of overtime in line with law or premium rates;
  - respect for the legal duration of the working day, rest periods and compensation rules;
  - prohibition of disciplinary wage deductions;
  - prohibition of unreasonable restrictions on workers' freedom of movement;
  - zero tolerance for harassment, abuse or intimidation;
  - commitment to equal treatment, diversity and non-discrimination in all employment practices.
-

## Occupational Health and Safety (OHS)

The Licensee/Supplier shall provide a safe and healthy working environment and:

- take proactive measures to prevent physical and psychological harm arising from working conditions;
  - identify and assess workplace health and safety risks and implement improvement programmes;
  - analyse emergency risks and maintain prevention and response plans;
  - provide workers with training, information and equipment necessary for safe work;
  - ensure first-aid and emergency treatment arrangements;
  - record and investigate occupational accidents and illnesses;
  - provide necessary personal protective equipment free of charge;
  - respect workers' right to **refuse unsafe work**;
  - maintain constructive dialogue with workers on health and safety matters;
  - comply with all applicable occupational health, safety and wellbeing laws and regulations.
- 

## Environmental Stewardship

In line with OTIV's commitment to environmental responsibility and sustainable impact, the Licensee/Supplier shall:

- regularly identify and assess environmental impacts related to its activities and take measures to reduce them;
  - monitor and, where possible, reduce **greenhouse-gas emissions** and resource consumption;
  - provide GHG-related information to OTIV upon reasonable request;
  - ensure the safe handling of hazardous substances;
  - prepare and maintain plans for preventing and managing environmental emergencies;
  - promote environmental awareness among employees and encourage reporting of environmental concerns.
  - comply with all applicable environmental laws, regulations and standards
- 

## Specific Requirements Related to the Use of OTIV Products

Where applicable, additional product-specific or safety-related requirements communicated by OTIV shall be complied with at all times.

---

## **Responsibility for the Supply Chain (Cascade Requirement)**

The Licensee/Supplier shall take reasonable steps to ensure that the principles of this Code of Conduct are respected by its own subcontractors, suppliers and business partners involved in delivering goods or services to OTIV. Upon request, the Licensee/Supplier shall provide evidence of its efforts to cascade these requirements throughout its supply chain.

---

## **Monitoring, Audits and Verification**

OTIV reserves the right to monitor compliance with this Code of Conduct, including through questionnaires, documentation reviews or audits, either directly or through independent third parties. The Licensee/Supplier shall cooperate fully and provide accurate and timely information when requested.

---

## **Reporting & Grievance Mechanism**

The Licensee/Supplier shall maintain a mechanism that enables workers and stakeholders to raise concerns or suspected violations confidentially and without fear of retaliation. Concerns relating to this Code may also be reported directly to OTIV. The Licensee/Supplier shall investigate reported concerns and take appropriate corrective action where necessary.

---

## **Non-Compliance & Corrective Actions**

In cases of non-compliance with this Code of Conduct, OTIV may request the implementation of a corrective action plan within a reasonable timeframe. Serious or repeated violations, or refusal to cooperate, may result in suspension or termination of the business relationship.

---

## **Data Protection, Cybersecurity and Confidentiality**

The Licensee/Supplier shall protect personal data, confidential business information and intellectual property in accordance with applicable data-protection laws and recognized cybersecurity standards. Appropriate technical and organisational measures shall be implemented to prevent unauthorised access, loss or misuse of information.

---

## **Export Controls, Trade Compliance and Sanctions**

The Licensee/Supplier shall comply with all applicable export-control, trade-compliance and economic-sanctions regulations, and shall not conduct business that would expose OTIV to legal or regulatory risk in this regard.