

Beck Optronic Solutions Limited

Integrity and Corporate Responsibility Charter

1 POLICY STATEMENT

The relationship between Beck Optronic Solutions, Partners, and Suppliers is an important component for building sustainable business success. Beck expects its partners and suppliers to fully comply with all applicable laws and regulations of the countries where they are registered and where they operate. The Beck Integrity and Corporate Responsibility Charter represents a minimum standard of best practice.

For the purposes of the Beck Integrity and Corporate Responsibility Charter, partners and suppliers shall encompass suppliers, sub-contractors, distributors, and resellers.

2 CONSEQUENCES FOR VIOLATION

In the event that the requirements of the Beck Integrity and Corporate Responsibility Charter are not met, Beck may decide to review the business relationship with the concerned partner or supplier and pursue corrective actions and either suspend or immediately terminate the business relationship without prejudice to any other remedies that Beck would be entitled to pursuant to legal or contractual provisions.

3 COMPLIANCE WITH LAWS

Beck's Partners and Suppliers shall comply with all applicable laws and regulations including without limitation, laws and regulations aimed at protecting human rights, fight against corruption, money laundering and terrorism, as well as laws related to antitrust, data protection, international trade compliance, workplace safety, health, and environment.

4 EMPLOYMENT PRACTICES

4.1 Human Rights

4.2 Partners and Suppliers are expected to share Beck's commitment to human rights and to treat people with respect and dignity, promote equal opportunities for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labour Organization (ILO) Conventions.

4.3 Child Labour

Partners and Suppliers must ensure that illegal child labour is not used in the performance of work. Child is defined as any person under the minimum legal working ages defined by the ILO or, if older, under the minimum legal working age in the country where the work is performed.

4.4 Human Trafficking, including Forced or Indentured Labour

Partners and Suppliers must adhere to regulations prohibiting human trafficking, and comply with all

applicable laws in the country in which it operates. Partners and Suppliers must refrain from violating the rights of others and address any adverse impact their operations may have on human rights.

4.5 Harassment and Healthy Working Environment

Partners and Suppliers are expected to ensure that their employees are provided with an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct. Employees should be provided with a safe and healthy working environment.

4.6 Non-Discrimination

Partners and Suppliers are expected to provide equal employment opportunities and treatment of employees through non-discrimination on the grounds of especially ethnic origin, sex, age, sexual orientation, trade union membership, personal political or religious beliefs.

Partners and Suppliers must also endeavour to provide a working environment that encourages the employment of people with disabilities (subject to local legislation). Partners and Suppliers are also expected to treat applicants for employment without discrimination.

4.7 Wage and Benefits

Partners and Suppliers must pay employees at least the minimum compensation required by local law and provide all legally required benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required, or where such laws do not exist, at least equal to their regular hourly rate. Deduction from wages as a disciplinary measure should not be permitted.

Partners and Suppliers must operate a health protection system within the applicable statutory requirements.

4.8 Social Dialogue

Partners and Suppliers are expected to respect the rights of workers to associate freely and communicate openly with managers regarding working conditions without fear of harassment, penalty, intimidation, interference or reprisal.

Partners and Suppliers are expected to recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing.

4.9 Weekly Rest Period

Partners and Suppliers must allow all employees a weekly rest period of at least 24 consecutive hours.

5 ANTI CORRUPTION

Partners and Suppliers are required to comply with foreign and domestic laws and regulations against bribery, corruption and influence peddling, such as the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act.

Partners and Suppliers are required to implement governance rules within their organisation in order to comply with applicable laws and regulations.

Partners and Suppliers are required to provide regular adequate training to their employees and executives and in particular the most exposed employees.

Partners and Suppliers must not offer, promise, gift, present or benefit to any person with the purpose that this person abuses or because this person would have made illegitimate use of its real or supposed influence in order to obtain distinctions, jobs, contracts or any other favourable decision. This includes but is not limited to, offering or making improper payments or offering anything of value

to government officials, political parties, candidates for public office, or other persons.

Partners and Suppliers are expected to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair advantage. In any business relationship, Partners and Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, that these exchanges do not violate the rules and standards of the recipient's organisation, and are consistent with reasonable marketplace customs and practices.

6 OTHER ILLEGAL PRACTICES

6.1 Compensation and Antitrust

Partners and Suppliers are required to comply with laws and regulations aimed towards the protection of competition and prohibiting antitrust practices. They must respect the principles of free price-setting and not fix prices or rig bids with their competitors. They must not share the market with competitors. They must not exchange current, recent or future competitively sensitive information with their competitors.

Partners and suppliers must refrain from participating in a cartel.

Partners and Suppliers holding a dominant position must not fix commercial conditions that could be characterised as excessive, discriminatory or loyalty-inducing or otherwise abusing their dominant position.

6.2 Insider Trading

Partners and Suppliers and their personnel must not use any material or non-publicly disclosed information obtained in the course of their business relationship with Beck as a basis for trading or for enabling others to trade in the stock of any company.

6.3 Fraud and Deception

Partners and Suppliers must not seek to gain an advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so. This includes defrauding or stealing from the company, a customer, or any third party, and any kind of misappropriation of property.

7 CONFLICT OF INTEREST

Partners and Suppliers are required to implement policies intended to avoid all conflicts of interest or situations which could lead to a conflict of interest including policies that enable employees in situations of conflict of interest (actual or potential) to notify their managers.

Partners and Suppliers are expected to provide adequate training to employees who may be exposed to the risk of conflict of interest.

8 MAINTAIN ACCURATE RECORDS AND AUDIT RIGHTS

Partners and Suppliers are expected to create and maintain accurate records, and not alter any record to conceal or misrepresent the underlying transaction represented by it. All records made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented.

Records should be retained based in the applicable retention requirements.

9 PROTECTION OF INFORMATION

9.1 Confidential/Proprietary Information

Partners and Suppliers shall properly handle sensitive information, including proprietary, personal and confidential information. Information should not be used for any purpose other than the business purpose for which it was provided, unless there is prior authorisation from the owner of the information.

In regards to protection of proprietary information, Partners and Suppliers must comply with all applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

9.2 Information Security

Partners and Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, misuse, modification and disclosure, through appropriate technical, physical, organisational and electronic security measures, which shall be revised as required to reflect at all times, at a minimum, industry standards.

9.3 Protection of Personal Data

Partners and Suppliers and their subcontractors, suppliers or other service providers shall comply with:

- European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR).
- The laws and regulations adopted to implement the GDPR.
- Any other applicable regulation (including laws, rules, government requirements, codes as well as international, federal, state and provincial laws).

10 ENVIRONMENT, HEALTH AND SAFETY

Partners and Suppliers shall establish an appropriate management system for Environment, Health and Safety (.i.e. ISO 14001, ISO 45001, ISO 50001, etc.) and promote the awareness of those policies amongst workers and suppliers.

Partners and Suppliers shall take appropriate to operate in a manner that:

- Limits the environmental impact of their operations, particularly by reducing consumption of energy and production of waste and by improving prevention and control of all other potential forms of pollution.
- Actively manages, prevents and mitigates environmental and health and safety risks (avoid as much as possible use of and exposure to hazardous materials, mitigate risks regarding storage conditions, manage possible re-use, re-cycle, transportation or disposal of waste, mitigate exposure to radiation etc.)
- Conserves natural resources, promotes valorisation and recycling of materials.
- Protects the environment in the communities within which they operate and all along their areas of impact.
- Ensures that their goods, works or services do not have a negative/detrimental impact on biodiversity.
- Develops a positive contribution to the fight against climate change.

And implement all protective measures to prevent any potential risk of damage to human or animal health and to the environment. Partners and Suppliers should protect the health, safety, and the welfare of their employees, contractors, visitors, suppliers and others who may be affected by their activities.

Partners and Suppliers shall ensure that all their operations, including their own supply chain, comply with all applicable environmental, health and workplace safety laws and regulations.

11 GLOBAL TRADE COMPLIANCE

11.1 Import

Partners and Suppliers must ensure that their business practices are in accordance with all applicable national laws, directives and regulations governing the import of parts, components and technical data in the Supplier's jurisdiction, as well as with other foreign trade controls and/or other trade and economic sanctions from the United States of America, the European Union, or from international trade organisations.

11.2 Export Control and Sanctions

Partners and Suppliers must ensure that their business practices are in accordance with all applicable national laws, directives and regulations governing the export or re-export of parts, components, and technical data in the Supplier's jurisdiction as well as with other foreign trade controls and/or other trade and economic sanctions from the United States of America, the European Union or from international trade organisations.

No transaction (including import, export or re-export operations of the products) will be conducted by the Suppliers and Partners, whether on behalf of Beck or not, with any denied or restricted entity or individual or any destination country that may be prohibited under the applicable laws and regulations of the United States of America, the European Union, or international trade organisations.

11.3 Responsible Sourcing of Minerals

Partners and Suppliers must comply with applicable laws and regulations regarding sourcing of minerals such as tin, tungsten, tantalum and gold, from conflict areas ("Conflict Minerals").

As such, Partners and Suppliers should establish a responsible purchasing and sourcing policy, reviewing its supply chain on a regular basis to ensure that there is no risk of conflict minerals being embedded in the Client's product or in the equipment or systems they manufacture or sell. In particular they must ensure that they do not, directly or indirectly, finance or provide any benefit to armed groups that are perpetrators of human rights violations.

12 ETHICS AND COMPLIANCE PROGRAMME REQUIREMENTS

12.1 Ethics and Compliance Policies

Partners and Suppliers are expected to establish management systems, commensurate with the size and nature of their risks and business, to support compliance with laws and regulations, as well as the requirements expressed within the Beck Integrity and Corporate Responsibility Charter. Partners and Suppliers are encouraged to implement their own written code of conduct and to flow down their principles to the entities that furnish them with goods and services.

Beck expects its Partners and Suppliers to maintain effective programs to encourage their employees to make ethical, value-driven choices in their business dealings – beyond compliance with laws, regulations and contract requirements.

12.2 Ethics and Compliance Alerts

M23 – Integrity & Corporate Responsibility Charter – Issue 2

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Page 5 of 6

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Beck's Partners and Suppliers undertake to notify Beck in a timely manner and by all means at their disposal of any suspected violation of the Beck Integrity and Corporate Responsibility Charter that might impact their relationship with Beck, whether it is allegedly committed by Beck employees, as well as their own subcontractors, suppliers and service providers.

Partners and Suppliers are expected to provide their employees with avenues for raising legal and ethical issues or concerns without fear of retaliation. Partners and Suppliers are also expected to take action to prevent, detect, and correct any retaliatory actions, in accordance with any applicable domestic status and regulation.

Approved by:



Andy Hedges
Managing Director – Operations

Review Date:

2nd September 2025