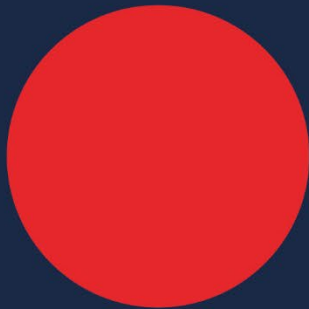




Code of Conduct



Code of Conduct

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1. Introduction

Welcome to Clicktouch's Code of Conduct. This document serves as a cornerstone of our commitment to operating with integrity, respect, and accountability in everything we do. It outlines the standards of behavior expected from all employees, contractors, and partners, ensuring that our actions reflect our core values and ethical principles.

At Clicktouch NV, we believe that success is not just measured by what we achieve but also by how we achieve it. Guided by our core values—Operational Excellence, Customer Oriented, Integrity, Evolution, and Together—this Code of Conduct helps us make decisions that uphold our reputation, foster a positive work environment, and build trust with our customers, suppliers, stakeholders, and communities.

Our commitment extends beyond our internal operations to include the fundamental principles of sustainable, transparent, and responsible corporate governance. These principles encompass respect for human rights, labor standards, environmental sustainability, and anti-corruption guidelines.

The Code provides clear guidance on key topics, including:

- Acting with honesty and integrity.
- Maintaining a respectful, inclusive, and safe workplace.
- Complying with laws, regulations, and company policies.
- Protecting confidential information and company assets.
- Avoiding conflicts of interest and unethical practices.

This Code is more than a set of rules; it is a reflection of our shared commitment to ethical behavior and mutual respect. We expect our partners to recognize, support, and implement these principles within their spheres of influence, working together with us to achieve sustainable success.

Each of us is responsible for understanding and upholding these standards, regardless of role or position. Together, by adhering to this Code of Conduct, we can foster a culture of trust, collaboration, and excellence, ensuring the ongoing success of Clicktouch NV and the communities we serve.

2. Topics

2.1 Human rights

We respect Internationally recognized human rights. There shall be no complicity in the violation of human rights in our company. Following business practices, without exceptions, are established at all times:

- To respect the personal dignity, privacy, and rights of each individual;
- To protect and uphold the right to freedom of speech and freedom of expression;
- To not tolerate unacceptable treatment of employees such as physical and psychological hardship, sexual and personal harassment or discrimination.

2.2 Labour guidelines

The applicable labour law and the fundamental rights of our workers (in accordance with the international conventions of the United Nations (UN), the International Labour Organization (ILO), the Organization for Economic Cooperation and Development (OECD) and the Global Compact of the United Nations) are observed at all times. These labour conditions are applicable for all Employees and managers, including part-time and temporary workers as well as casual workers such as day labour workers.

2.2.1 Freedom of association and collective bargaining

We respect the rights of Employees to freely associate and bargain collectively. This means that our employees have the freedom to join, or not to join, an association of free choice as well as establish an association of free choice, to organize and to bargain collectively and individually in accordance with local laws and regulations.

2.2.2 Prohibition of forced labour

We explicitly forbid forced labour, modern slavery or comparable acts that involve the deprivation of liberty (as defined in ILO Conventions No. 29 and 105). All work relationships and agreements are established on a voluntary basis. Our employees have the possibility to end the employment relationship in accordance with the applicable local laws.

2.2.3 Prohibition of child labour

Child labour is not tolerated at any cost. Workers under the age of 15 are not employed in our factory.

2.2.4 Promotion of diversity, equal opportunities

We promote a working environment free of discrimination, harassment, intimidation, or coercion relating directly or indirectly to age, gender, race, colour of skin, nationality, social or ethnic origin, language, sexual orientation, marital status, religion or state of health or disability. Furthermore, compliance with these provisions is being pushed through in any aspect of employment (e.g., recruitment, promotion, and remuneration).

2.2.5 Remuneration and hours of work

All employees are fairly compensated and excessively low wages are not tolerated ("wage dumping"). Salaries of all employees are paid regularly. The compensation is merchantable and in accordance with the national statutory minimum wage rates. Working conditions are in compliance with all applicable laws and mandatory industry standards pertaining to regular working hours, and overtime hours, including for breaks, rest periods, holidays, maternity, and paternity leaves. A regular work time over 60 hours per week, including overtime, is not required from the employee. Employees have at least one day off after six consecutive days of work, and any overtime worked is voluntary and compensated at premium rate.

2.2.6 Health and safety at work

We ensure that our employees work in a safe and healthy environment with at least protection against fire, accidents and hazardous substances. We ensure that there are adequate sanitation, health and safety policies and procedures in place and that our employees have received adequate instructions.

2.3 Business ethics

2.3.1 Corruption

We regard compliance with law and order in the places where we do business as both self-evident and necessary. Corruption, especially in the form of extortion and bribery, is not acceptable. In particular, no advantages contrary to the law are promised or granted to decision-makers in order to realise a business deal or to influence the decision-making process.

2.3.2 Counterfeit parts

All parts are sourced from original suppliers. Counterfeit parts are not allowed in any circumstances. Notification of any suspected counterfeit product(s) should be made as soon as possible. We expect from our suppliers to conduct their business and provide their services in a truthful and transparent way.

2.3.3 Confidentiality

We make sure to protect all confidential information provided to ClickTouch NV by our customers. We protect any personal data from misuse and comply with all applicable data protection laws and regulations.

2.4 Environmental responsibility

It is our goal to preserve the earth with its natural resources. Therefore, in particular we have following actions running:

- legal requirements and international standards are strictly adhered
- reducing the use of harmful substances to an unavoidable minimum
- reducing waste to the absolute minimum
- applying the precautionary principle in dealing with environmental problems
- initiatives have been taken for greater environmental awareness
- clean technologies are developed and disseminated.

We exercise the necessary care to take measures to avoid using conflict minerals in our products in order to prevent human rights violations, corruption and financing armed groups or similar via this route.

We undertake to comply with the regulations on prohibited and declarable substances, including (but not limited to) RoHS and REACH. We actively monitor changes in these regulations and inform our customers immediately if we become aware that the changes affect the products.

3. Supply Chain

At ClickTouch NV we believe that our commitment to ethical practices extends beyond our own operations to include our suppliers and business partners. We expect all suppliers to adhere to the same high standards outlined in this Code of Conduct, including compliance with laws regarding human rights, labour guidelines, business ethics and environmental responsibility.

We are committed to partnering with suppliers who share our values of integrity, fairness, and respect for human rights. Regular assessments will be conducted to ensure compliance, and any supplier found in violation of these standards may face corrective action or termination of the business relationship.

Approved and signed by: Cedric Blomme – CCO & Bert Destoop – COO on 19/12/2024