



SUPPLIER CODE OF CONDUCT

POLESTAR SOLUTIONS AND SERVICES INDIA PVT LTD (POLESTAR SOLUTIONS) values our supplier relationships and is committed to working with, and supporting, our suppliers to achieve mutual objectives. A supplier's performance and adherence to high business standards is an important and integral part of the value chain for POLESTAR SOLUTIONS. POLESTAR SOLUTIONS promotes and expects the application of high legal, ethical, environmental and employee-related standards within our own business and among our suppliers.

Our commitment to integrity and professionalism is set forth in our Code of Business Ethics and Conduct (COBEC), which provides a clear set of standards for all of our business conduct. We believe that deviations from, or violations of, the Code of Conduct are unacceptable. This Supplier Code of Conduct sets forth the minimum standards of business conduct that we expect from all of our suppliers:

1. **Compliance with laws:** Suppliers shall comply fully with all laws and regulations applicable to them.
2. **Environmental sustainability:** POLESTAR SOLUTIONS expects its suppliers to demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide:
 - 2.1 Suppliers should have in place an effective environmental policy, statement or program to mitigate environmental risks, the implementation of which should be evident throughout all levels of the company.
 - 2.2 Suppliers should have processes in place to ensure that their operations conform to all applicable environmental legislation. All required environmental permits, approvals and registrations are to be obtained, maintained and complied with in accordance with the conditions and requirements defined therein.
 - 2.3 Environmental performance should be measured, monitored and reviewed regularly. The supplier should endeavor to make continuous improvements in environmental performance through practicable measures and employ leading practices where possible.
 - 2.4 Suppliers should make practical efforts to minimize the use of energy, water and raw materials. Where possible, these should be renewable or sustainably sourced.
 - 2.5 Emissions to air that are likely to cause pollution or contribute to climate change should be monitored, controlled and minimized where possible.
 - 2.6 Suppliers shall make practical efforts to eliminate or reduce levels of generated waste and should reuse and recycle waste materials wherever possible. The handling, storage, movement, treatment and disposal of all waste must be carried out in accordance with applicable regulations and in an environmentally responsible manner.
 - 2.7 Suppliers should consider the environmental credentials and performance of vendors within their own supply chain and require them to operate to a minimum set of standards.
 - 2.8 Products and services provided to POLESTAR SOLUTIONS should include options that offer reduced environmental impact by utilizing environmentally sound technologies, processes and sustainable materials, etc.
3. **Human rights and social sustainability:** Policies should be in place to confirm the supplier's commitment to points 3.1—3.12, and improvement programs should be in place where relevant:
 - 3.1 Freedom from forced labor, bonded labor and human trafficking:
 - All employment shall be freely chosen by the worker. Workers shall be free to leave their employment at any time (subject to reasonable and paid notice periods) and shall not be subject to any coercion or restriction through, for example, the holding of original copies of employee passports, identity documents or monetary deposits.

- There shall not be any use of bonded labor. Work must be undertaken for fair compensation and must not be undertaken to repay a debt incurred (i.e., as a result of deceptive recruiting practices).

3.2 Recruitment agencies: Where recruitment agencies/brokers are used by the supplier, appropriate due diligence and ongoing management must be undertaken to ensure that risks of worker exploitation are effectively mitigated. Reasonable evidence of these activities is to be available to POLESTAR SOLUTIONS upon request, within a reasonable notice period.

3.3 Child labor: Suppliers should adhere to local laws relating to the minimum working age and not engage in the employment of child labor, directly or indirectly.

3.4 Wages and benefits: At a minimum, the legal minimum wage standard must be adhered to across the entire workforce, employees should receive clear information on their wages, and unfair deductions from wages as a disciplinary measure are not permitted.

3.5 Working hours: Working hours must be limited according to national or local law, including breaks. Overtime should be voluntary, should not replace regular employment and must be fairly compensated.

3.6 Health and safety and working conditions: A safe and hygienic working environment should be provided with an awareness of any industry-specific hazards. Relevant training should be provided to employees.

3.7 Regular employment: All employees should be provided with a written employment contract setting out their terms and conditions in accordance with the local relevant legal jurisdiction. We expect all employment and the termination of employment to be carried out in a fair manner.

3.8 No harsh or inhumane treatment: Abuse, threat of abuse, and sexual or other harassment or intimidation should be prohibited by suppliers. Suppliers shall make available to all workers within their operations and supply chain a mechanism for which grievances relating to labor practices can be anonymously raised, without fear of retribution. Suppliers shall investigate and take appropriate action to remedy all grievances raised.

3.9 Subcontracting: Where authorized subcontracting is used to support the execution of services for POLESTAR SOLUTIONS, the supplier shall confirm that the subcontractor meets the minimum expectations set out in Section 3 of this document through the following controls:

- Supplier shall take necessary steps to obtain and maintain visibility over labor rights risks within the operations and supply chains of subcontractors.
- Supplier shall attain the right to audit over subcontractor operations.
- Records of audits undertaken of subcontractors shall be available on request.
- Supplier shall have written agreements in place with subcontractors to ensure that any further subcontracting by the subcontractor company (a) is authorized and (b) meets the standards set out in this document.

In addition to the above minimum requirements, the supplier shall define a minimum standard of human rights that applies across all jurisdictions and demonstrate how compliance to this is encouraged and observed.

4. **Diversity and inclusiveness:** Our sourcing decisions, contracts and management of supplier relationships will reflect and promote the principles of the POLESTAR SOLUTIONS' Diversity and Inclusiveness guidelines which form an integral part of our Code of Business Ethics and Conduct (COBEC) (incorporating equal opportunities) in that Polestar Solutions will seek to ensure that suppliers do not victimize, harass or discriminate against any employee or party to the contract due to their sex, gender identity/expression, marital or civil partnership status, race, ethnicity or national origin, disability, religion, sexual orientation, age or part-time status. Suppliers will be required to meet the requirements of any applicable discrimination legislation. Our suppliers will be treated fairly and equally during the tendering and purchasing process.

5. **Ethics:** The highest standard of integrity is expected in all of our business dealings. Any and all forms of corruption, extortion, bribery (including facilitation payments), and embezzlement, non-compliance of tax regulations, etc. are strictly prohibited and may result in immediate termination and legal action:
- 5.1 Suppliers will not offer or provide money or anything of value to any person if the circumstances indicate that it is probable that all or part of the money or other thing of value is being given to another individual or entity to influence official action or to obtain a business advantage.
- 5.2 Suppliers are expected to understand relevant gift and hospitality policies of Polestar before offering or providing POLESTAR SOLUTIONS personnel with any gift and/or business entertainment. Gifts or entertainment should never be offered to POLESTAR SOLUTIONS personnel or representatives under circumstances that create the appearance of impropriety.
- 5.3 Suppliers must comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods and services (including software and technology). All invoices and any customs or similar documentation submitted to POLESTAR SOLUTIONS or governmental authorities in connection with transactions involving POLESTAR SOLUTIONS must accurately describe the goods and services provided and the price thereof.
- 5.4 Suppliers shall not share or exchange any prices, costs or other competitive information, or undertaking of any collusive conduct with any other third party to POLESTAR SOLUTIONS with respect to any proposed, pending or current POLESTAR SOLUTIONS procurement.
- 5.5 Suppliers will use only subcontractors or other third parties who comply with all applicable laws and regulations, and who adhere to the same (minimum) standards set forth in this guide.
6. **Monitoring:** POLESTAR SOLUTIONS may conduct compliance surveys to confirm compliance with this Supplier Code of Conduct. However, POLESTAR SOLUTIONS expects that suppliers will actively audit and monitor their day-to-day management processes with respect to the POLESTAR SOLUTIONS' Supplier Code of Conduct and provide evidence to POLESTAR SOLUTIONS upon request.