



KWANT CONTROLS
s n e e k - h o l l a n d



CODE OF CONDUCT

For Suppliers and Business Partners

INTRODUCTION

Following the Dutch maritime tradition, KWANT CONTROLS B.V. has been established in designing and manufacturing Nautical Instruments since 1937.



KWANT CONTROLS is located in the northwest of the Netherlands, in an area where the sea and water are always close by and as one of the world's leading manufacturers of state-of-the-art high-end nautical controls and systems, KWANT CONTROLS is continually focused on innovations for improved operations for our end-users. With over more than seventy employees, KWANT CONTROLS daily seeks and ensures technological innovation in the field of control units and nautical navigation equipment. Ultimately, the efficient, safe and reliable control of ship navigation is our main target.

Our extensive experience guarantees our customers continuity and reliability when using KWANT CONTROLS instruments in their remote control systems. Because of our dedicated, flexible, certified and quality-oriented organization, KWANT CONTROLS can offer a wide range of tailor-made products and variations on the standard instruments, with special design and high-quality engineering. Nearly all products are type approved by the world's leading Classification Societies and Inspections.

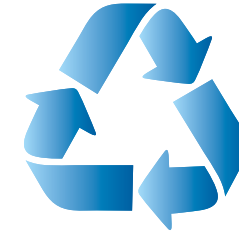
Being such a company means that KWANT CONTROLS has a responsibility as a corporation to customers, employees, investors and the public. This Corporate Social Responsibility ("CSR") includes compliance at all times with all relevant statutory as well as respecting ethical values and acting responsibly for our business, the social environment and the environmental sustainability.



By supporting and acting in line with the United Nations' Global Compact, KWANT CONTROLS has undertaken to consider its principles in the areas of human rights, safe and healthy working environment, environmental protection, anti-corruption and sustainability. Furthermore, KWANT CONTROLS meets the labour standards laid down in the conventions of the International Labour Organization (ILO) and the Dutch labour organizations. KWANT CONTROLS has also set itself binding guidelines in its Code of Conduct for acting in a responsible and sustainable manner.

In line with the CSR/sustainability strategy pursued by KWANT CONTROLS, the company expects its suppliers (i.e. all contracting parties that supply KWANT CONTROLS with goods, materials or services), business partners (including business partners with an intermediary and/or representative function that act in the interests of or on behalf of KWANT CONTROLS in a sales support capacity, such as consultants, agents, trading representatives, authorized dealers/importers, joint venture and syndicate partners etc.) and their employees to act responsibly and undertake to observe the basic principles outlined in this KWANT CONTROLS Supplier and Business Partner Code of Conduct. If the suppliers or business partners involve third parties (e.g. subcontractors or representatives) in their business dealings with KWANT CONTROLS, KWANT CONTROLS expects these third parties to also observe the principles laid down in this KWANT CONTROLS Code of Conduct.

SUSTAINABILITY AND CORPORATE SOCIAL RESPONSIBILITY



Kwant Controls is committed to sustainability in all business activities and aims to apply and abide by the highest ethical, social and environmental standards, in line with the below statement:

“Sustainable development meets the needs of the present without compromising the ability of future generations to meet their own needs” (Brundtland/UN-1987).

Our QHSE (Quality/Health/Safety/Environment) policy, this Code of Conduct and the internal Kwant Controls values and standards ensure a way of working towards sustainable development.

Corporate Social Responsibility involves a duty to comply with all official and applicable regulations and resolutions in force. KWANT CONTROLS expects its suppliers and business partners (henceforth referred to as KWANT CONTROLS' suppliers) to particularly observe the following basic principles:

Human Rights:

KWANT CONTROLS' suppliers respect the regulations in force worldwide to protect human rights as a fundamental and general requirement. This also involves KWANT CONTROLS' suppliers refraining from the use of forced labour or child labour. Suppliers and business partners comply with the rules laid down in ILO Convention 138 concerning the minimum age of employment for children and in ILO Convention 182 concerning the Prohibition and Immediate Elimination of the Worst Forms of Child Labour.

Human Treatment

KWANT CONTROLS' suppliers have disciplinary policies and procedures stating there is to be no harsh and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees, nor the threat of any such treatment.

Equal opportunity and non-discrimination

KWANT CONTROLS' suppliers do not discriminate on grounds of national or ethnic origin, race, sexual orientation, political affiliation, union membership, religion, opinions, age, physical disability, marital status or any other legally protected characteristics. Employees with physical disabilities will be provided with the job working environment required for them to perform their job function.

Environmental protection

KWANT CONTROLS' suppliers take responsibility when it comes to environmental protection concerns and comply with all applicable legislation relating to the environment and sustainability. They use natural resources sparingly and minimize harm to the environment. All required environmental permits, approvals and registrations are to be obtained, maintained and kept current.

Suppliers will make continual progress towards eliminating and reducing waste of all kinds, including water and energy, at source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Hazardous Substances

KWANT CONTROLS' suppliers should use materials in their products which do not contain any hazardous, ozone-depleting substances, asbestos or nuclear-contaminated substances at any time. Materials applied are compliant with the various European Union Legislations and regulations imposed.





CONFLICT
MINERALS
FREE

Conflict Minerals (3TG)

Following the EU regulations on Conflict Minerals, KWANT CONTROLS' suppliers should agree with the following:

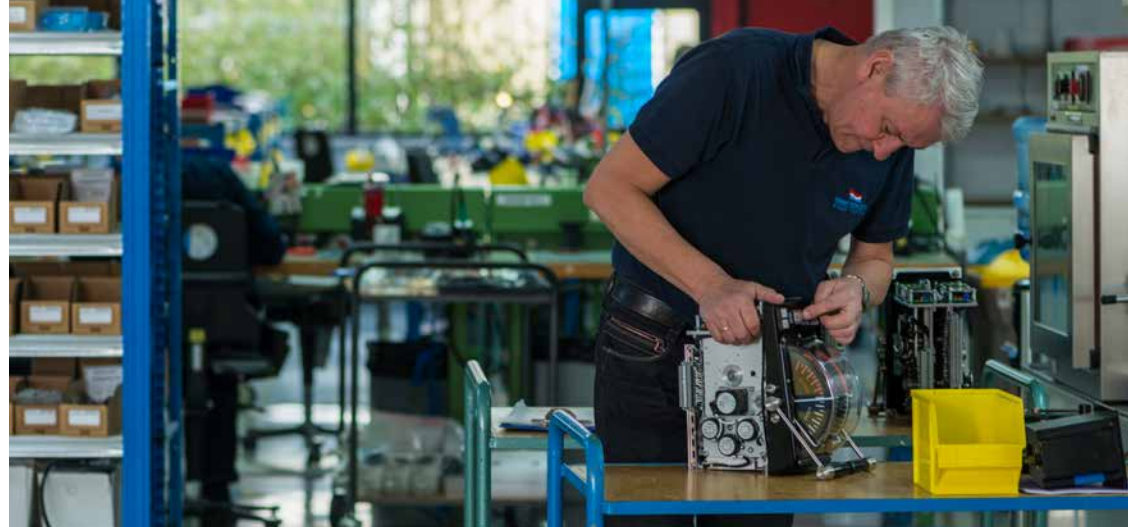
Suppliers are expected to supply materials to KWANT CONTROLS that are "Conflict Free" and to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems. For example, Tin (Sn) and Gold (Au) applied in parts supplied to KWANT CONTROLS should not originate from the Democratic Republic of Congo (DRC) or an adjoining country.

Product Safety

KWANT CONTROLS' suppliers comply with all applicable legal product-safety regulations and requirements, particularly legal requirements pertaining to safety, labelling and packaging of products as well as to the use of dangerous substances and materials.

Working hours

Suppliers' working-hours are not to exceed applicable legal limits. KWANT CONTROLS' suppliers will provide employees with all legally mandated leave, such as maternity leave, paternity leave, compassionate leave and annual leave.

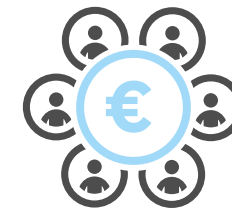


Health and Safety in the workplace

KWANT CONTROLS' suppliers comply with the relevant legal regulations for health and safety in the workplace. They support the further development and improvement of working conditions with respect to health and safety. Employees are to be provided with appropriate, well-maintained, personal protection equipment where necessary.

Remuneration

KWANT CONTROLS' suppliers ensure that their employees are commensurately remunerated. Salaries and other benefits shall be paid to employees in compliance with all applicable local wage laws and Labour Organizations and/or collective bargaining and the respective job market, including those relating to minimum wages, overtime hours and legally mandated benefits.



TRANSPARENT BUSINESS RELATIONSHIPS

Openness and Transparency are key to credibility and trust in business practice. KWANT CONTROLS expects suppliers and business partners to particularly observe the following basic principles:

Free competition:

KWANT CONTROLS' suppliers comply with the applicable anti-trust legislation. In particular, they do not enter into any anti-competitive agreements with competitors, suppliers or customers. If they are in a dominant position in the market, they do not abuse this position.



Export Control:

KWANT CONTROLS' suppliers and business partners ensure that they comply with all applicable legal and fiscal provisions for importing and exporting goods, services and information.

Money laundering:

KWANT CONTROLS' suppliers only enter into business relationships with business partners of whose integrity they are convinced. They ensure that the applicable legal money laundering provisions are not breached.

Business Information

KWANT CONTROLS' suppliers publish accurate business information and report on their business activities truthfully and in line with statutory regulations.

PROTECTION OF DATA, BUSINESS INTELLIGENCE AND COMPANY ASSETS

Confidential Data, Business Intelligence (Intellectual Property) and Company Assets have to be protected. KWANT CONTROLS expects suppliers and business partners to particularly observe the following basic principles:

Data protection

KWANT CONTROLS' suppliers observe all statutory regulations to protect the personal data of employees, customers, suppliers and other parties concerned.



Protection of know-how, patents, trade and business intelligence (Intellectual Property)

KWANT CONTROLS' suppliers respect the know-how, patents, trade and business intelligence of KWANT CONTROLS and third parties and do not pass such information on to third parties without the explicit prior written consent of KWANT CONTROLS.

Handling company assets

KWANT CONTROLS' suppliers respect KWANT CONTROLS' tangible and intangible assets and do not use them for unfair or non-business purposes. They ensure that their employees, as well as any third party they involve in the business relationship (such as subcontractors or representatives), neither damage nor misuse KWANT CONTROLS' assets, i.e. use these assets contrary to KWANT CONTROLS's interests.

LEGAL CONSEQUENCES OF VIOLATING THE KWANT CONTROLS SUPPLIER AND BUSINESS PARTNER CODE OF CONDUCT

If a KWANT CONTROLS' supplier or business partner does not observe and comply with the basic principles laid down in this Code of Conduct, KWANT CONTROLS reserves the right to take appropriate measures such as legal action and/or terminate the business relationship with this supplier or business partner.



Information references:

In preparing this Code of Conduct the following sources were used:

United Nations Global Pact
www.unglobalcompact.org

Convention on the Rights of the Child
www.ohchr.org

ILO Minimum Age Convention (C.138-1973)
www.ilo.org

ILO Prohibition and Immediate Elimination of the Worst Forms of
Child Labour Convention (c.182-1999)
www.ilo.org

Conflict Minerals (3TG)
[https://ec.europa.eu/trade/policy/in-focus/conflict-minerals-regulation/
regulation-explained](https://ec.europa.eu/trade/policy/in-focus/conflict-minerals-regulation/regulation-explained)

ISO Management System certification by DNV
www.dnv.com

Kwant Controls Supplier Declaration of Conformity and Kwant Controls
Declaration Conflict Minerals
www.kwantcontrols.com

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QUALITY IN COMMAND



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