



# Cowin Global Supplier Code of Conduct

## 1. Introduction

Cowin Global (“Cowin”) is committed to ethical and sustainable business practices. This Supplier Code of Conduct (“Code”) defines the minimum standards we expect from our suppliers in line with international frameworks, including ILO, BSCI, SA800, UNGPs, UNODC and UNGC. In the event of a conflict between this Code and local law, local law shall prevail. In all cases, the most stringent applicable standard shall be followed.

**The key principles** that guide this Code are: continuous improvement, cooperation, empowerment, code observance, protection of vulnerable persons, and transparency.

### **We require suppliers to:**

- 1.1 Comply with all applicable laws and regulations;
- 1.2 Comply with the requirements of the present Code;
- 1.3 Extend the Code to subcontractors and business partners;
- 1.4 Identify the root cause and implement corrective and preventive actions in a timely manner to resolve any non-compliance with the provisions of this standard;
- 1.5 Notify Cowin of risks and issues within the Supplier’s supply chain in a timely and complete manner.

Any supplier found to be in breach of the Code may be subject to corrective actions, contract suspension or termination of their contract/business relationship. We do recognize the value of collaboration in achieving compliance and continuous improvement and are committed to engaging openly and constructively with our partners to address any issue.

## 2. Scope

This Code is mandatory for all key suppliers of Cowin, supplying to any Cowin site worldwide.

Key Suppliers are defined as organizations that provide high-risk or high-impact materials and services essential to our core production and operational continuity. This includes, but is not limited to:

- Providers of key raw materials and components, such as steel tubes, steel wire, steel plates, sheet metal, castors, wheels, and other direct production-related inputs.
- Providers of critical logistics and transportation services that impact our supply chain resilience and carbon footprint.

These entities encompass manufacturers, wholesalers, distributors, intermediaries, and service providers whose activities may have a substantial direct or indirect environmental and social impact on our value chain.

## 3. Labor & Human Rights

**Cowin suppliers treat all workers with respect and dignity. They prohibit the use of subcontracting in a way that undermines workers' rights.**

### **3.1 Forced & Child Labor**

Our suppliers:

- Prohibit all forms of forced, bonded, or involuntary labor.

- Prohibit child labor, in accordance with local law and a minimum age of 15, whichever is higher.
- Prohibit hazardous work for young workers below 18 years old.
- Prohibit engaging in or supporting physical, psychological or abusive punishment of employees.
- Adhere to ethical recruitment principles, requiring that their recruitment partners:
  - Charge no recruitment fees or costs to workers.
  - Provide clear and transparent employment contracts.
  - Ensure workers' freedom from deception and coercion.
  - Respect freedom of movement and prohibit the retention of identity documents.
  - Provide access to free, comprehensive, and accurate information about work and living conditions.
  - Respect the freedom to terminate contracts, change employers, and return safely.
  - Provide access to free dispute resolution and effective remedies.

### **3.2 Fair Wages & Working Hours**

Our suppliers:

- Provide all employees with a work contract and a pay slip.
- Grant all employees entitlement to holiday pay, sick pay, and paid parental leave.
- Pay wages that meet or exceed legal minimums and are sufficient for basic needs.
- Render all wages and benefits lawfully, on time, and in full.
- Prohibit punitive wage deductions without a legal basis.
- Ensure overtime is voluntary, compensated at a premium rate, and does not exceed 12h/week.
- Overtime shall not represent a significantly higher likelihood of occupational hazards.
- Ensure working hours comply with national law and do not exceed 48 hours per week. Averaging of hours across multiple weeks is permitted only to the extent allowed by local law.
- Grant workers the right to daily resting breaks and at least one day off per seven-day period, unless exceptions defined by collective agreements.

### **3.3 Safe & Healthy Working Conditions**

Our suppliers:

- Implement systems to assess, prevent, and mitigate threats to worker health and safety.
- Ensure all relevant personnel are familiar with emergency plans.
- Maintain records of all health and safety incidents.
- Maintain a safe, hygienic, and hazard-free workplace with adequate lighting, ventilation, temperature, and noise control.
- Provide safety training, protective equipment, and free access to emergency medical care.
- Ensure proper ergonomic conditions to prevent occupational injuries.
- Provide free access to safe drinking water, separate eating and resting areas, clean and safe toilets, and safe residential facilities where applicable.

### **3.4 Non-Discrimination & Harassment**

Our suppliers:

- Base employment decisions on merit, free from discrimination (age, gender, race, social class, nationality, ethnicity, religion, disability, sexual orientation, union membership, political affiliation, customs, etc.).
- Prohibit all forms of harassment, abuse, or intimidation (physical, verbal, sexual, economic or psychological).
- Implement policies that protect and provide equal opportunities for vulnerable groups.

### **3.5 Collective Bargaining & Grievance Mechanism**

Our suppliers:

- Respect the right of workers to join unions/employee committees and bargain collectively.
- Implement systems ensuring no retaliation against workers for organizing or raising grievances.

- Have established a fair, confidential, and non-retaliatory grievance mechanism, clearly explained and accessible to all workers for raising workplace concerns.

## 4. Environmental Sustainability

**Cowin suppliers identify the environmental impacts of their operations and implement measures to prevent, mitigate, and remediate adverse impacts.**

### 4.1 Legal Compliance & Pollution Prevention

Our suppliers:

- Comply with all applicable environmental laws.
- Maintain a risk management plan to prevent, reduce, and control environmental harm.
- Manage hazardous substances responsibly.
- Prioritize waste reduction, recycling, and proper disposal (avoiding landfill).
- Establish effective incident reporting and investigation procedures, including the implementation of corrective actions and continuous improvement strategies.

### 4.2 Resource Efficiency & Climate Action

Our suppliers:

- Minimize energy, material, and water consumption through efficiency measures.
- Prudently use natural resources and actively use renewable, recyclable, or recycled materials.
- Implement carbon footprint reduction initiatives (e.g. energy saving, renewable energy to replace fossil fuels, green logistics, use of green technologies).
- Ensure deforestation-free sourcing for raw materials where applicable.

### 4.3 Biodiversity & Ecosystem Protection

Our suppliers:

- Prohibit operations in protected areas without proper safeguards.
- Employ sustainable sourcing practices to prevent soil degradation and water pollution.

## 5. Business Ethics & Anti-Corruption

**Cowin suppliers conduct all business with integrity, fairness, and transparency.**

### 5.1 Anti-Corruption & Fair Competition

Our suppliers:

- Uphold fair competition and prohibit anti-competitive practices.
- Prohibit corruption, extortion, embezzlement, bribery, kickbacks, fraud, money laundering, and nepotism.
- Prohibit promising, offering, giving, or accepting -directly or indirectly- any item, service, or benefit of value, that is intended to influence an action or decision, or for personal gain.
- Comply fully with all anti-corruption laws.
- Maintain accurate and transparent records, ensure clear payment records across the supply chain, conduct due diligence checks.
- Regularly provide employees with instruction on those topics.
- Promptly notify Cowin of any violations of these rules.

### 5.2 Conflict Minerals & Responsible Sourcing

Our suppliers prohibit sourcing from high-risk areas linked to armed conflict, illegal mining and human rights abuses.

### 5.3 Data Privacy, Information Security & Intellectual Property

Our suppliers:

- Protect confidential and personal information in compliance with privacy and information security laws.
- Respect intellectual property rights.
- Implement reasonable physical, technical, and administrative security measures to prevent unauthorized access, use, disclosure, alteration, or destruction of Cowin data.
- Promptly report any actual or suspected information security breaches involving Cowin data.

## 6. Accountability & Compliance

**Cowin suppliers uphold a culture of accountability, implementing robust systems for transparency and continuous improvement.**

### 6.1 Transparency & Reporting

Our suppliers:

- Maintain accurate, authentic and unaltered records (e.g., payroll, working hours, audits etc).
- Fully cooperate with announced and unannounced compliance audits and provide the evidence of their compliance with this Code.
- Encourage the reporting of Code violations through Cowin Global's reporting channel: [report@cowinglobal.com](mailto:report@cowinglobal.com) (see: *Cowin Global Grievance & Reporting Mechanism*)

### 6.2 Implementation, Corrective Actions & Continuous Improvement

Our suppliers:

- Train employees on this Code and labor/environmental standards, in the most appropriate form and language.
- Continuously improve their social and environmental performance.
- Implement corrective action plans for any non-compliance.
- Are encouraged to pursue relevant third-party certifications (e.g., SA8000, ISO 14001)

### 6.3 Subcontractor & Supplier Management

Our suppliers:

- Apply this Code to all tiers of their supply chain.
- Conduct due diligence on their own suppliers.
- Share best practices across their supply chain.

*This Code was last revised in October 2025, by Cowin Global Head of Sustainability*

## 7. Agreement and Implementation

By signing this document, you affirm your commitment to implement this Code of Conduct within your company, including the continuous monitoring of compliance and the effective communication of these requirements to all relevant personnel.

Company name and stamp:

Representative name and signature:

Date: