

RUBIX

SUPPLIER CODE OF CONDUCT

January 2021

Introduction

As an industrial supply distributor of products manufactured by thousands of companies and industrial service providers, Rubix views its suppliers as a fundamental element of its business success and endeavours to select suppliers who adopt standards that are consistent with Rubix's corporate beliefs and values.

Rubix participates in the United Nations (UN) Global Compact, a voluntary initiative that seeks to advance universal principles on human rights, labour, environment, and anti-corruption through the active engagement of the corporate community, in cooperation with civil society and representatives of organised labour.

Rubix (Rubix Group Holdings Limited and its subsidiaries) expects that its suppliers of goods or services (collectively "Suppliers") adhere to this Supplier Code of Conduct which provides policy and guidance on the standards that we expect of our employees, and that our customers expect of us.

Employment and Human Rights/Modern Slavery

Rubix abides with the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's (ILO) eight core conventions, and the ILO Declaration on Fundamental Principles and Rights at Work).

As a group with headquarters located in the UK, Rubix also complies with the provisions of the UK Modern Slavery Act 2015 and, in compliance with this, has a Modern Slavery Act transparency and policy statement published on its website at www.rubix-group.com/slavery.

Rubix does not condone and will not participate in any form of human exploitation, including child or forced labour, slavery or people trafficking. Rubix is committed to ensuring that slavery, forced or child labour or human trafficking do not occur in its supply chain or in Rubix's business.

As such, Rubix requires its Suppliers to conduct employee relations in an ethical manner and in compliance with requirements stipulated by both international and local laws and industry standards.

This includes, but is not limited to complying with the following principles:

- Support and respect the protection of internationally proclaimed human rights;
- Make sure that you are not complicit in human rights abuses;
- Elimination of any form of illegal or forced labour;
- Effective abolition of child labour: Suppliers shall not employ any person who has not reached the minimum legal age and undertake not to support child labour, except for any youth training program approved by the public authorities;
- Elimination of any discriminatory practices and ensuring equal employment opportunities, support to diversity and inclusions;
- Compliance with legal provisions applicable in respect of maximum working hours, minimum wage, dismissal;
- Uphold the employees' freedom of association and the effective recognition of the right to collective bargaining and
- Employees' health protection by ensuring health, safety and security at the work place.

Environment

Suppliers shall demonstrate an awareness of environmental matters as well as complying with all applicable environmental laws and regulations as can be applicable to Suppliers' activities and in particular but not limited to the following:

- The production, handling, processing, storage, disposal or transportation of solid, gaseous or liquid waste,
- The exposure to hazardous, dangerous, toxic or noxious substances and
- The control of any potential pollutant, the protection of the air, the water or the soil.

All required environmental permits, licenses and registrations shall be obtained by Suppliers and their operational and reporting requirements and restrictions followed.

At Rubix's request, Suppliers shall provide appropriate environmental permits, licences or registrations.

Sustainable Procurement

Rubix endeavours to purchase from organisations that pursue and promote social responsibility and environmental sustainability through actions such as (but not limited to):

- The use of energy efficient products in their manufacturing processes
- The use of products and services which are themselves sustainably sourced and
- Reducing polluting activities resulting from the transportation of goods to Rubix.

We do not, as far as possible, purchase products that:

- Are not energy or resource efficient; and
- Contain environmentally damaging chemicals, solvents, volatile organic compounds and other substances damaging to health and the environment.

We endeavour to work with our suppliers to:

- Share, when relevant, standards of best practice;
- Promote transparency of sustainable procurement practice and
- Promote equitable working relationships.

Quality and Insurance

Rubix requires that any goods supplied shall be without fault and of the best available design, quality, material and workmanship, and shall conform in all respects with any order and specification supplied or advised by Suppliers and their representatives. Suppliers shall provide Rubix with all relevant certificates, declarations and technical documentation related to supplied goods.

Any services supplied shall be provided by appropriately qualified and trained personnel, with due care and diligence, to such high standard of quality as is reasonable for us to expect in all circumstances and shall conform in all respects with any order.

Suppliers shall maintain insurance policies with coverage customary in the businesses in which Suppliers are engaged, including but not limited to public and product liability insurance.

Economic and Trade Sanctions

Rubix adheres to strict economic and trade sanctions regulations and expects that Suppliers of services or equipment comply with those regulations as well.

Suppliers shall not, within their supply chain, use suppliers which are located in any country subject to United Nations, U.S., UK or EU economic sanctions (or acting on behalf of persons

or entities located in such countries) or appears on lists of restricted or prohibited persons maintained by the United Nations, U.S, UK, EU or the country of manufacture.

Suppliers' activities can also be subject to trading export and import control laws of the involved countries.

Suppliers shall abide with all relevant export laws regulating goods and technology sale and transfer based upon the origin of the goods/technology and shall obtain any required licences or avoid sales or transfer to certain end users or destinations.

Suppliers shall work closely with Rubix to identify products that may be classified as dual use.i.e products that could also be used in the production of arms and other militaria items.

Fair Competition

Rubix is committed to promoting the principles of fair and open competition based on compliance with competition law and expects the same from Suppliers.

Agreements of any kind with competitors about prices, terms and conditions of business, market allocation and other economical sensitive issues will not be tolerated.

Anti-Corruption

Rubix has a policy of zero tolerance on fraud or corruption in any form.

As Rubix's business partners, Suppliers shall:

- Not directly or indirectly offer, pay, promise or accept money or anything of value to/from a national or foreign government official or private business partners or individuals to influence an official action or obtain an improper advantage, business, or to secure any commercial or financial advantage for itself, the other party or any of their respective affiliates
- Abide by all applicable anti-corruption laws and regulations, such as major international requirements such as the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the French Sapin II Law (2016-1691 dated 09.12.2016), U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act 2010, and all other national and local anti-corruption laws in force wherever Suppliers operate and
- Not cause Rubix, directors, employees, representatives or agents to be in violation of any applicable anti-corruption regulation.

Conflict of interest

Suppliers must avoid interactions with any Rubix employee that may conflict or appear to conflict with that employee acting in the best interests of Rubix. In order to ensure that we can build strategic relationships with our Suppliers and engage appropriately with them, all potential conflicts of interest e.g. family relation or other business relationships, must be disclosed by Suppliers in a fully transparent manner.

Gifts and hospitality

Suppliers shall abstain from offering gifts and invitations to Rubix's employees beyond ordinary corporate hospitality, such as small business-related gifts, modest meals and entertainment.

Consequently, Suppliers can offer gifts and invitation to Rubix's employees only if they are in strict compliance with the above rules and applicable laws, reasonable, not extravagant

or excessive, customary, not given or received for any improper purpose or influence and additionally in line with specific locally defined Rubix's policies.

Conflict Minerals

In response to violence and human rights violations in the mining of certain minerals from the "Conflict Region", which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries, the U.S. Securities and Exchange Commission (SEC) has adopted rules to implement reporting and disclosure requirements related to "conflict minerals," as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (US).

The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain "conflict minerals" that are "necessary to the functionality or production" of those products.

The definition of "conflict minerals" refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future.

Suppliers are committed to the responsible sourcing of "conflict minerals" throughout their supply chain and to continuing to comply with the underlying SEC rules and regulations surrounding "conflict minerals".

Prevention of Counterfeits

Suppliers shall develop, apply and maintain adapted methods and efficient process to detect counterfeit or otherwise adulterated or misbranded versions of the products and prevent those versions from entering into distribution systems and reaching customers.

Money Laundering

Suppliers shall comply with all laws and regulations related to anti-money laundering and must not be involved in or support any money-laundering practice.

Anti-facilitation of Tax Evasion

Rubix takes a zero-tolerance approach to facilitation of tax evasion, whether under UK law or under the law of any foreign country and we expect the same from Suppliers.

Personal data security and protection

Suppliers shall ensure compliance with data protection laws and in particular with the EU GDPR (General Data Protection Regulations) and UK Data Protection Act 2018. Suppliers shall implement appropriate technical and organisational security measures to avoid unauthorised disclosure, unlawful processing, loss, theft, accidental or fraudulent deletion, alteration or destruction, or damage of personal data.

Confidentiality

Even if not covered by a specific confidentiality agreement, Suppliers shall keep confidential and not disclose or reveal to any third party all information and documentation of a confidential nature received from Rubix for a purpose of consultation including but not limited to Rubix's customers documentation.

Supplier Practices

Suppliers shall operate their businesses and conduct employee relations in an ethical manner and in compliance with the present Code as well as requirements stipulated by both international and local laws and industry standards.

Additionally, Suppliers shall ensure their sub-contractors guarantee the same level of compliance with the present Code.

Rubix expects its Suppliers to have in place adequate policies and procedures that enable Rubix to be reasonably assured that they meet the standards expected of them as described in this Code.

If Suppliers fail to meet these expected standards, Rubix may suspend its relationship with that supplier until the issue is resolved.

Suppliers are encouraged to fulfil the requirements described in this Supplier Code by allocating appropriate resources, including but not limited to training their employees on the expectations set forth in this Supplier Code.

Supplier Compliance assessment

Suppliers are expected to monitor their own compliance with this Supplier Code, although Rubix reserves the right to assess Suppliers' compliance with this Code. Rubix employees or third parties, may from time to time seek reasonable rights of access to documentation related to Suppliers' and their sub-contractors' compliance with this Code, including access to data provided to applicable sustainability ratings providers such as, but not limited to, EcoVadis.

We acknowledge the above terms and agree to abide by this Rubix Supplier Code of Conduct.

Signature

By: (Name)

Date:

Email address:

Position:

Authorised signatory for and behalf of (Supplier name)

Supplier's address: