
CSI tools BV

Code of Ethical Conduct

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CSI tools Code of Ethical Conduct

Introduction

As an international business with suppliers, customers and representatives all over the world, we accept that we have a duty to trade responsibly. The core values by which CSI tools operates are: *taking care of our people, fostering ethical business relationships and respecting environment.*

Accordingly, our Business Partners, i.e., our Suppliers, Customers, Agents, Subcontractors, etc., are encouraged to comply with and seek to develop relationships with their own supply chains consistent with the principles set out below as a minimum, and be compliant with all local laws.

On the following pages we present the CSI tools Code of Ethical Conduct principles (the “**Code**”) along its three dimensions:

- A. Employment,**
- B. Enterprise Business Ethics,**
- C. Environment.**

A. Employment

A1. Child labor shall not be used

Children shall not be employed and young persons under 18 shall not be employed the night or in hazardous conditions. Policies and procedures shall conform to the provisions of ILO standards and applicable laws.

A2. Regular employment is provided

To every extent possible work performed must be on the basis of recognized employment relationship established through national law and practice.

Obligations to employees under labor or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labor-only contracting or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

A3. Employment is freely chosen

There is no forced, bonded or involuntary prison labor. Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

A4. No discrimination is practiced

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

A5. Working conditions are safe and hygienic

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers.

Access to clean toilet facilities and to potable water and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

The responsibility for health and safety is assigned to a Senior Management representative.

A6. Freedom of association and the right to collective bargaining are respected

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organizational activities. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

A7. Living wages are paid

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.

All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted nor shall any deductions from wages without the expressed permission of the worker concerned. All disciplinary measures shall be recorded.

A8. Employee development is supported

We support our employees in their growth and personal development by offering them training, coaching and mentoring. We invest in the knowledge and skills of our employees on an ongoing basis to support their long-term employability.

We stimulate openness and accountability by involving our employee in the development and execution of our business objectives. We encourage and provide channels for employee feedback.

A9. No harsh or inhumane treatment is allowed

Physical abuse, the threat of physical abuse, verbal abuse and any other forms of intimidation or violence are prohibited. Management, members of the hierarchic line and the employees are also obliged to refrain from any act of harassment or sexual harassment at work.

A10. Measures concerning protection against violence, harassment and objectionable sexual behavior in the workplace

Employees are expected to contribute positively towards prevention that is used in the context of psychosocial risks at work.

If the above occurs, we shall take any reasonable measures to put an end to the damage arising from psychosocial risks at work, including excessive and repetitive stress, burnout, conflict and violence, harassment or sexual harassment at work.

B. Enterprise Business Ethics

An Enterprise Business Ethics approach views individuals working in all areas of a company - for example, investor relations, marketing, operations or sales, etc. - as being responsible for ethics, and not just the people who have jobs related to ethics and compliance.

B1. Integrity and Objectivity

We perform our work with honesty, diligence, and responsibility.

False information exchanged in the course of commercial negotiations and business is strictly prohibited. Information exchanged with Business Partners shall never be used in any manner that would be detrimental to the legitimate and ethical objectives of the organization, for illegal purposes or for individual gain.

Regarding our objectivity we shall not accept anything that may impair or be presumed to impair our professional judgment.

B2. Quality and Competency

Any products supplied shall be of the best available design, quality, material and workmanship and shall conform in all respects with any order and specification agreed upon between CSI tools and its Business Partners.

Any services supplied shall be provided by appropriately qualified and trained personnel, with due care and diligence, to such high standard of quality as it is reasonable for our Business Partners to expect under our agreements.

B3. Confidentiality and Property

CSI tools is dedicated to protecting any confidential, personal and proprietary information, including intellectual property ("I.P.") and shall be particularly prudent in the use and protection of information acquired in the course of its duties (e.g. audit data, privacy data, etc.).

Business Partners are also expected to comply with all applicable laws and regulations governing the protection, use and disclosure of CSI tools confidential, personal and proprietary information, including I.P.

B4. Inside Information

We instruct our employees on the prohibition of abuse of inside information and on the need to handle such information (especially share price sensitive information) with due care.

B5. Respect and Local Cultures

We encourage our employees to be respectful and to be sensitive in the course of business to local cultures, traditions and customs.

B6. Fair Competition

CSI tools strictly prohibits anti-competitive agreements or conduct, including, amongst others, fixing prices, restricting the supply of goods or services, bid rigging and market sharing. We require our Business Partners to be committed to free and fair competition and to abide by relevant competition laws and regulations.

B7. Commission Payments

We ensure that any commission payment, agent fee, etc. is based on a real, legitimate, documented service.

B8. No Conflict of Interest

CSI tools expects its employees and Business Partners to immediately identify and address situations where there is an actual conflict of interest, or even the appearance of a conflict of interest.

B9. No bribery or corruption shall be tolerated

The offering, paying, soliciting or accepting of bribes or kick-backs, including facilitation payments, is strictly prohibited.

A bribe may involve giving or offering reward or advantage to someone in business of government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary.

B10. No Money Laundering

CSI tools conducts its business with high integrity and within the bounds of the law. We shall not allow our Business Partners to condone or support money laundering in any form in any location on our behalf.

B11. Transparent Accounting

CSI tools accounting records and supporting documents truly, fairly and completely describe and reflect the nature of the underlying transactions.

C. Environment

C1. Land Acquisition

We adhere to the principle of free, prior and informed consent of all communities when acquiring land. The rights of communities and traditional peoples to maintain access to land and natural resources shall be recognized and respected.

C2. Environmental Management

We support and encourage development/production systems and operating practices that are sustainable. Our Business Partners are encouraged to continually strive towards improving efficiency and sustainability of their operations which shall include, for example, water conservation programs, waste disposal, energy saving, etc.

Business Partners should be aware of and able to demonstrate compliance with all current legislation that may affect their activities.

D. Implementation and Compliance

D1. Implementation

CSI tools is supporting the implementation of the Code with communications and training programs. It is every employee's personal responsibility to take note of these communications and take part in these programs.

In areas covered by this Code as well as in other functional areas, more detailed guidance is given in the form of Corporate Policies, Requirements and Directives and especially in the day-to-day operations. It is a Management responsibility to ensure that these are implemented and applied wherever applicable.

D2. Permanent Internal Dialogue and Guidance

Employees who are in doubt about the implementation of any part of the Code should seek guidance from the Management.

Employees who realize that they have acted in violation of the Code must report this immediately. Failure to do so shall be regarded as an aggravating circumstance.

Non-compliance may lead to disciplinary sanctions. Serious cases of non-compliance, such as willful violation of the Code, hiding information or fraud, will lead to sanctions as it will be regarded as a serious misconduct. Under the national law, a serious misconduct can lead to dismissal.
