

Supply Chain and Procurement Policy

1 PURPOSE AND BACKGROUND

The purpose of this policy is to describe how East Capital Group (“Company”) works with procurement and supply chain related issues. We are a signatory of the United Nations Global Compact (UNGC) and as such commit our organisation to meet fundamental responsibilities in four areas: human rights, labour, environment, and anti-corruption.

East Capital Group requires its suppliers and its subcontractors (“Suppliers”) to comply with this policy, when doing business with East Capital Group. We encourage our Suppliers to engage in constructive dialogue with us regarding the policy when doing business together.

2 SCOPE OF APPLICATION

This policy applies to all East Capital Group’s Suppliers defined as providers of goods and services to the Company under a contractual agreement, such as suppliers, subcontractors, service providers, consultants, intermediaries, and agents.

We expect Suppliers to consider the requirements listed below as being applicable to their own Suppliers.

3 LAWS AND REGULATIONS

Suppliers are required to comply with all applicable laws, rules, and regulations in the countries where they operate. East Capital Group expects Suppliers to meet the more stringent requirements between this policy and applicable laws. In case of contradictions or a conflict between this policy and applicable laws and regulations, the Supplier is to inform East Capital Group of such conflict.

4 HUMAN RIGHTS AND LABOUR RIGHTS

East Capital Group expects Suppliers to respect internationally recognized human rights and not cause, contribute to, or be linked with any negative impact on human rights, through their business operations.

4.1 CHILD LABOUR

Suppliers should not participate in or benefit from any form of child labour. No children below the minimum age of employment or below the age for completing compulsory education in their country, should be employed by Suppliers. No workers under the age of 18 shall be employed by Suppliers to perform any work defined as hazardous in national law.

4.2 FORCED OR COMPULSORY LABOUR

Suppliers shall not participate in, or benefit from any form of forced labour, including such practices as the unlawful or illegitimate withholding of wages. Suppliers shall not allow any practice that would restrict free movement of employees.

5 WORKING CONDITIONS

5.1 WORKING HOURS

Suppliers shall ensure compliance to applicable laws and regulations, or relevant collective agreements with regards to working hours.

5.2 WORKING ENVIRONMENT

The work environment must comply with laws and agreements, while remaining safe and sound from physical, mental, and social perspective. Suppliers will work systematically and proactively to continuously improve employees’ work environment and health.

We encourage all Suppliers to have accident or liability insurance to procure to the injured employees the compensation for expenses related to the occupational accidents.

Employees will be informed about any possible health risks that the work may entail. Employees will receive training on the possible health risks that the work may entail, including fire safety, hazardous work and first aid. All employees will have access to, and use, the appropriate protective equipment. Essential information is to be readily available in a language that the employee fully understands.

5.3 NON-DISCRIMINATION

Suppliers shall not practice any form of discrimination in hiring and employment practices. No discrimination is permitted based on gender, national or ethnic origin, age, sexual orientation, and religious faith.

6 ENVIRONMENT

East Capital Group’s values are founded on being responsible and assuming a long-term perspective, in which care for the environment plays an important part. East Capital Group’s environmental work is established on continual improvements through environmental risk assessment and handling, and we expect Suppliers to do the same. The suppliers shall strive to reduce their consumption of energy, water, and other resources.

6.1 ENVIRONMENTAL LEGISLATION

Suppliers shall operate in accordance with applicable environmental laws and based on all required permits and licenses.

6.2 CLIMATE AND ENVIRONMENTAL IMPACT

Suppliers will conduct business with respect for the environment and comply with current environmental legislation. Suppliers will maintain an effective overview of, and routines for, identifying, measuring, and monitoring their environmental impact and, moreover, will work systematically to continuously improve their environmental performance.

6.3 WASTE

Suppliers strive to reduce the amount of waste resulting from their operations, especially relating to hazardous waste. All waste should be handled according to local regulations and best practices and reuse and recycling should be promoted.

7 DATA PROTECTION AND CONFIDENTIALITY

Suppliers shall ensure that all uses of personal data take place in accordance with applicable laws and regulations. Suppliers are expected to ensure the protection of confidential information received from East Capital Group, our customers and others against misuse, theft, fraud, or improper disclosure.

8 ANTI-CORRUPTION AND ANTI-BRIBERY

Suppliers shall conduct their operations with a high level of integrity, and zero-tolerance to any form of bribery or corruption. This includes never seeking to improperly influence or bribe employees, customers, public officials or any other private or public individual or entity. Suppliers shall not offer or accept any benefits or other means to obtain any undue or improper advantage.

9 CONFLICT OF INTEREST

Suppliers shall avoid conflicts of interest and notify East Capital Group of any actual or perceived conflict of interest situations in their work with East Capital Group.

10 WHISTLEBLOWING

In the context of providing a contractually agreed service or goods to East Capital Group, if the Supplier, its employees, its contractors, its customers, its shareholders, or any other party including the public at large, regulators, special interest groups such as NGOs, trade unions, believes that the terms of this policy are not followed, or that East Capital Group is in violation of this policy, the relevant party is encouraged to report such concerns to the East Capital Group's management, or please use the address below:

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