

BUSINESS ETHICS POLICY

At SISA, integrity, ethical conduct, human rights, and regulatory compliance are fundamental to our operations. This Business Ethics Policy defines the behavioral standards expected across all our business activities and serves as a commitment to act with responsibility, fairness, and transparency worldwide.

1. Legal Compliance

Relationship with Public Authorities and Representatives

SISA conducts all interactions with Belgian and foreign public authorities respectfully and in full compliance with applicable laws, always to promote and defend legitimate business interests.

Financial Responsibility

We follow generally accepted accounting principles to ensure truthful, accurate, and transparent financial records.

Anti-Corruption, Extortion, and Bribery

SISA enforces a zero-tolerance policy against corruption, bribery, or unethical practices. We recognize the risks of criminal behavior in business dealings and strictly prohibit bribery from or towards any third party, regardless of the jurisdiction.

Anti-Money Laundering

SISA is dedicated to preventing money laundering and the financing of terrorism in all its operations.

Fair Competition and Antitrust

We compete fairly and lawfully, respecting all antitrust and fair competition regulations in the markets where we operate.

2. Operations in International Markets

Import, Export, and Economic Sanctions

All international trade activities comply with applicable import/export controls, re-export laws, and economic sanctions.

Respect for Anti-Corruption Laws

SISA adheres to anti-corruption legislation in all global markets.

Free Competition

We maintain a firm commitment to ethical competition and fair-market conduct internationally.

3. Ethics and Business Practices

Responsible Procurement

SISA is committed to conflict-free sourcing and responsible mining. Our practices align with the Electronic Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI), supporting the Conflict-Free Smelter Program.

Product Integrity and Counterfeit Prevention

We implement robust systems to prevent the inclusion of counterfeit materials and ensure all sales comply with applicable laws.

Business Records

All business records are managed honestly, accurately, and in compliance with relevant regulations concerning data integrity and retention.

Rejection of Arbitrariness

SISA does not make arbitrary decisions that serve personal or third-party interests over those of the company.

Conflict of Interest

Business decisions are made on objective grounds, free from favoritism or personal relationships.

4. Human Rights and Labor Standards

Child Labour and Young Workers

We do not employ anyone under the minimum legal working age. Employment contracts are established following national labor laws, including special provisions for young workers, ensuring safe, non-exploitative work conditions.

Wages and Benefits

All employees receive at least the legally mandated minimum wage, with appropriate benefits, in line with industry standards and fair labor practices.

Working Hours

Working hours, including overtime, are managed in accordance with national labor laws and international standards to protect workers' health, safety, and well-being.

Modern Slavery

SISA opposes and actively prevents all forms of modern slavery, including human trafficking, forced or compulsory labor, and servitude, across all operations and throughout its supply chain.

Ethical Recruiting

We ensure fair, transparent, and voluntary recruitment practices. Workers are never required to pay recruitment fees, and employment terms are clearly communicated and freely agreed upon.

Freedom of Association and Collective Bargaining

Employees have the right to form or join labor unions and engage in collective bargaining, without fear of retaliation or discrimination.

Non-Discrimination and Harassment

We provide equal opportunities and fair treatment to all, regardless of race, nationality, sex, religion, age, disability, sexual orientation, marital status, political views, or union membership. Harassment or any form of abuse is strictly prohibited.

Women's Rights

SISA promotes gender equality and empowers women in the workplace, ensuring equal pay, safety, and career advancement opportunities.

Diversity, Equity, and Inclusion (DEI)

We value diversity and foster a culture of inclusion and equity. SISA promotes a respectful and supportive environment where everyone feels safe, heard, and empowered.

Rights of Minorities and Indigenous Peoples

SISA respects and protects the rights, traditions, and land of minorities and indigenous communities, engaging in dialogue where our operations may affect them.

Land, Forest, and Water Rights and Forced Eviction

We commit to respecting land, water, and forest rights of all communities. SISA condemns and prohibits forced evictions in connection with any business activity.

Use of Private or Public Security Forces

Any security forces engaged by SISA act within the law, with full respect for human rights. Excessive use of force, harassment, or intimidation is not tolerated.

SIGNED:

DATE:

PRESIDENT / CEO

ZEDELGEM 31/07/2024

SISA NV