

# ○ — SUPPLY CHAIN POLICY

XP Power Limited (“XP Power” or the “Company”) Supply Chain Policy

This Supply Chain Policy (the “Policy”) defines XP Power Limited’s commitments to upholding environmental and labour standards within its supply chain.

The policy applies to all suppliers to XP Power, and their employees (whether permanent, fixed term, or temporary), in addition to any other third parties contracted to provide a service to the Group.

The Board of Directors has ultimate responsibility for the implementation of this policy.

## **Policy Statement**

As an international manufacturer of electrical and electronic equipment, the management of our supply chain is critical to our success. Our supply chain primarily consists of direct purchasing through distribution or fabrication suppliers. However, we recognize that our supply chain extends beyond our direct suppliers, and that materials indirectly procured by the Group could originate from countries that afford lesser protections to workers, or where environmental or human rights abuses are more prevalent.

Accordingly, XP Power is committed to best practices in our supply chain, and to sourcing raw materials and products in a responsible and sustainable manner. We seek to behave ethically and build long-term relationships with our key suppliers. All key suppliers are required to sign up to our Code of Conduct, covering what we expect from those stakeholders regarding business ethics, responsible environmental behaviour, health and safety, and treatment of people, and familiarise themselves with the standards in this policy.

We have a rigorous approval process that assesses all aspects of a supplier’s business before we engage with them. This screening process includes the prospective suppliers’ quality systems and standards, financial viability, environmental performance, and the treatment of their people. In addition, we include these considerations in our supply agreements, requiring full compliance with relevant environmental laws, rules, regulations, orders and permits. We reserve the right to request certification of this legal compliance.



## Environment

XP Power seeks to reduce the environmental impact of both our operations and products, and continually seeks to embed sustainability into our business, including through water reduction initiatives, renewable energy installations, and recycling initiatives. We expect our suppliers to operate their businesses in a way that supports these ambitions, not least our target to reduce Scope 1, 2 and 3 emissions to net zero by 2040.

As a minimum, we expect suppliers to comply with our Environmental Policy as described in the employee Code of Conduct. As the first power converter manufacturer to be admitted to the Responsible Business Alliance, we likewise expect all our suppliers to adhere to these standards. Suppliers are expected to comply with all relevant environmental legislation and regulations and maintain relevant environmental permits; to employ best practices to minimise waste and prevent pollution; and to have appropriate leadership to promote continuous improvement and environmental risk mitigation. Suppliers should promptly notify XP Power of any environmental incidents.

## Social

### Minimum living wage

All terms of employment, including, but not limited to, wages and benefits, must at minimum meet legal requirements. Our supply chain partners should ensure that their employees are paid on time and in full, as per their employment terms, and should pay at least the national minimum wage or in accordance with industry standards where no statutory minimum wage exists.

### Non-discrimination

XP Power does not tolerate any form of discrimination, and is committed to equality of opportunity in hiring, compensation, and training. We apply these same standards when selecting business partners and expect our suppliers to act in accordance with these principles. No workers should be unfairly treated or privileged on the basis of protected characteristics including gender, race, ethnicity, country of origin, nationality, social and cultural background, religion, family responsibilities (including pregnancy), sexual orientation, age, or disability.

### Maximum Working hours

We expect our suppliers to respect national legislation and industry standards on maximum working hours. Working hours should not exceed legal limits, and workers should be provided with reasonable time for rest between shifts, at least one day of rest in every seven-day period, and paid annual leave as required by local law. Workers should also be guaranteed labour rights including sick leave, parental leave, and compassionate leave in accordance with law. Suppliers should take steps to minimise excessive working hours where they are identified, and not mandate employees to work overtime.

### Forced and Child Labour

We expect our suppliers to have practices in place that prohibit the recruitment of child labour and use of forced, bonded, or trafficked labour. All workers should be employed on a voluntary basis



and should be free to terminate their employment with due notice. No worker should be required to lodge a deposit or official documentation such as a passport as a condition of employment.

All workers should be at least of the minimum legal working age, or the mandatory school leaving age in the local country.

### **Health and Safety**

We expect all suppliers to comply with national and international health and safety laws and regulations. Suppliers should aim to continuously minimize health and safety risks and improve working conditions through measures such as certified health and safety management systems, appropriate safety training, and distribution of H&S policies and protocols to workers.

Risks to employees should be minimized. Workers involved in potentially hazardous work should be clearly informed of hazards and provided with all necessary personal protective equipment at no personal expense. Equipment and machinery should be maintained and serviced on a regular basis to ensure its continued safety.

### **Freedom of Association and the right to collective bargaining**

In accordance with our commitment to the Universal Declaration of Human Rights, we support and respect our employees' right to freedom of association and collective bargaining, and to form or join trade unions. We expect our suppliers to provide the same rights for their workers, in accordance with local laws. No employees should face discrimination or prejudice for their decision to join, or refrain from joining, a workers' representation body.

### **Harassment and abusive behaviour**

No worker should be subjected to any form of harassment, abuse or intimidation, whether verbal, physical, sexual or psychological. Additionally, no workers should be subjected to corporal punishment.

### **Living conditions**

Where suppliers are responsible for providing accommodation or other living facilities for workers, these should be sanitary and in compliance with legislation. Workers should be provided amenities including hygienic toilet and washing facilities, and access to safe drinking water.

## **Monitoring and reporting**

XP Power will use a variety of monitoring techniques such as auditing and self-assessments to measure the performance against criteria defined in this policy.

The Board will review this Policy annually, or as appropriate, to reflect best practice and to ensure its effectiveness.



**XP Power**

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**The above statement was approved by the Board of Directors of XP Power Limited on 11 Jan 2023.**

**For and on behalf of the Board**

A handwritten signature in black ink, appearing to read 'G. Griggs', written in a cursive style.

**Gavin Griggs**  
Chief Executive Officer

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