



Code of Conduct for Business Partners

Ethics, consumer safety, environment and anti-corruption policies

2 Ride Group is the owner of the SHARK, NOLAN, CAIRN, CASCO, SEGURA and BERING brands, which are well known for their protective equipment for mobility and outdoor use.

2 Ride Group and each of the companies of the Group (hereinafter referred to as “**the Group**”) attach great importance to ensuring that their business partners, their manufacturers and their suppliers (collectively referred to as “**Business Partner(s)**”) as well as their subcontractors share a set of common principles and practices with the Group.

In the conduct of its activities, the Group is committed to complying with all applicable laws, regulations, conventions with respect to labor standards, social responsibility, protection of the environment, ethics and business integrity.

Regardless of where Business Partners are located and where services are provided to the Group, they must be provided in a manner consistent with the highest standards that contribute to the solid reputation of the Group and its brands.

The Group therefore requires its Business Partners to respect the principles and practices set forth in this Code of Conduct for Business Partners (hereinafter referred to as the “**Code**”) and to implement adequate internal policies to ensure compliance with this Code in the management of their own companies and to ensure that their own suppliers and subcontractors respect the principles set forth in this Code.

In the event of inconsistency or discrepancy between the English version and any other language version of the Code, the English language version shall prevail.

1. COMPLIANCE WITH LAWS AND REGULATIONS

Business Partners shall comply with all applicable laws and regulations of the countries in which operations are managed or service provided and also in full compliance with this Code.

When a local legislation or regulation and this Code address the same subject with different standards, the highest standards shall apply.

2. HUMAN & WORKERS RIGHTS

We expect our Business Partners to treat people with respect and dignity, promote diversity, freedom, equal opportunity for all, encourage an inclusive and ethical culture in line with International Labour Organization (hereinafter referred to as “**I.L.O.**”) guidelines.

Prohibition of Forced Labor and Human Trafficking

Business Partners shall ensure that all work is voluntary. Business Partners shall not engage in human trafficking or any form of slavery, forced labour, debt bondage, indentured labor or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or



employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. Business Partners shall not withhold workers' original government-issued identification and travel documents.

Business Partners shall ensure that workers' contracts clearly convey the conditions of employment in a language understood by the workers. Business Partners shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities. Workers shall not be required to pay employers' or their agents' recruitment fees or other similar fees to obtain their employment.

Prohibition of Child Labour

Child labor shall not be used under any circumstances. Business Partners must comply with local laws, legislation and regulations regarding minimum age of employees and workers.

According to I.L.O., a child is defined as any person under the age of 15, unless local legislation on minimum age stipulates a higher age for work or compulsory school, in which case the higher age applies. If local legislation sets the minimum age at 14, in accordance with developing country exceptions under the ILO Convention No. 138, the lower age applies.

Discrimination and Harassment

Employees shall not be discriminated against based on gender, race, colour, sexual orientation, age, ethnicity, nationality, marital status, pregnancy, religion, political affiliation, social status, union membership or other such characteristics. Workers shall not be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse.

Working Hours

Working conditions, working time and compensation must be fair, complying with laws, standards and practices applicable in the countries where the supplier operates.

In addition, except in extraordinary business circumstances, all workers are entitled to at least one day off in every seven-day period. All employees shall have written contracts in a language they can understand, specifying their rights and terms of employment.

Compensation

Business Partners shall adopt remuneration policies which meet or exceed the statutory minimum wage established by national or local legislation; or, in the absence of dedicated legislation, provide a regular wage which meets at the very least the basic requirements of their employees, defined according to each jurisdiction. No wage deductions should be made for disciplinary reasons.

Freedom of association and collective bargaining

Business Partners acknowledge and respect the freedom of association for their employees and the right to collective bargaining, in compliance with conventions No. 87 and No. 98 of the I.L.O.

Equality of treatment

Business Partners shall observe with regard to all their employees equal and fair treatment, by prohibiting any discrimination with regard to hiring, access to training, promotion, dismissal, for reasons of nationality, social or ethnic origin, gender, religion, age, disability, sexual orientation,



political view or any other form of discrimination, in accordance with the laws and regulations in force in their jurisdiction.

Local Communities

Business Partners must ensure that the rights of the local community are respected particularly with regard to the environmental and social impact of the business in the area.

3. HEALTH & SAFETY

In accordance with the ILO Convention, on health and safety, Business Partner shall work continuously and take appropriate steps and measures to provide and maintain a safe and healthy working environment for all our employees by addressing identified risks, carrying out preventive measures, assessing the effectiveness of those measures and seeking continuous improvements. Business Partners shall aim to develop a sustainable health & safety culture in the organization.

Workplace safety

Business Partners shall ensure compliance of buildings with construction, maintenance and safety standards in force through regular workplace inspections by experts and ensure that machines and equipment in the workplace are secured.

Safety training

Business Partners shall have identified and assessed health and safety risks, set up procedures and trainings to detect, avoid, and mitigate as much as possible any hazards that constitute a risk to the health, hygiene, and safety of staff. Workers must have been prepared to respond in case of an emergency. Health and safety instructions must be put in place and widely communicated. Compliance by workers must be regularly evaluated.

Work accidents

Business Partners shall implement procedures and systems to prevent, manage and monitor work accidents. Business Partners shall comply with applicable work health and safety laws and insurance requirements such as workplace accident compensation insurance.

Business Partners shall identify and assess the degree of exposure of their employees to chemical, biological and physical agents; and provide their employees with appropriate protective equipment. Workers must be provided with protective equipment appropriate to their activities.

Occupational health

Business Partners shall provide workers with clean, ventilated or aerated areas, usable sanitary facilities, access to drinking water and eating areas, in accordance with hygiene regulations in force. Accommodation and dormitories provided by Business Partners must be clean, safe, secure and habitable (hot water, heating and ventilation, sufficient space).

4. ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

The Group encourages action to control the effects of its activities on the environment. In this perspective, the Group requires its Business Partners to comply with applicable local and international environmental laws and regulations, and to obtain all required environmental permits.

Business Partners are encouraged to minimize any negative impact their business might have on the environment and optimize the use of natural resources and avoid a wasteful handling of resources.

Treatment and discharge of industrial wastewater

Business Partners shall manage their operations and activities in order to reduce as much as possible their impact on water by reducing their water consumption and ensuring groundwater quality is checked and, if necessary, treated prior to discharge.

Air emissions

General emissions from operations and greenhouse gas emissions must be monitored, checked and, if necessary, treated by our Business Partners before they are released. Our Business Partners are responsible for minimizing the air emission polluting the environment and in particular by reducing greenhouse gas emissions.

Waste treatment and disposal

The Business Partner shall identify, treat, reduce and dispose of or recycle solid waste in a responsible manner. Chemicals or other materials that present a risk if released into the environment must be identified and handled in such a way as to ensure safe handling, transportation, storage, use, recycling or reuse and disposal.

Energy efficiency

Energy consumption must be monitored and documented. Cost-effective solutions must be found to improve energy efficiency and minimize energy consumption. The use of renewable energies must be encouraged.

Handling of chemicals

Business Partners shall avoid the use of substances and materials that are hazardous to the environment and health.

REACH Compliance

REACH (Registration, Evaluation, Authorization and Restriction of Chemicals EC 1907/2006) is the European Union's chemical regulation that came into force in June 2007. Part of this legislation involves 'Substances of Very High Concern' (SVHC) as defined by the European Chemical Agency. The official list is available at http://echa.europa.eu/chem_data/candidate_list_table_en.asp.



The delivery of the substances or preparations or articles implies that the following requirements under regulation (EC) N° 1907/2006 (REACH) are met:

1. completion of the registration process for product(s) constituent, where required;
2. supplying of a safety data sheet in English and compliant with the provisions of REACH - Annex II, where required;
3. reporting the presence (in concentrations > 0.1% w/w) of substances included in the "Candidate List of Substances of Very High Concern - SVHCs", on the date of its last update;
4. compliance with the specific conditions set out in the authorization (REACH - Annex XIV) and restriction (REACH - Annex XVII) lists, on the date of their last update;
5. transmission of SCIP notification number for articles containing SVHCs > 0.1% w/w, where required.

As a consequence of this obligation to consumers under the REACH regulations, we must be informed of your REACH procedures with regard to SVHC within your products and packaging. We therefore require:

- The name of the designated contact within your organization (with phone number and e-mail address) who is responsible for managing the response to a REACH enquiry from a consumer.
- Details of your REACH 45-days consumer response procedure.

5. CONFLICT MINERALS

Business Partners must comply with applicable laws and regulations regarding direct or indirect sourcing of critical materials and minerals from conflict areas (if contained in purchased products).

All suppliers must declare to the Group the presence and origin of materials regulated by the standard relating to Conflict Minerals called "3TG", such as Gold, Coltan, Cassiterite, Wolf Ramite and their derivatives such as Tantalum, Tin and Tungsten if contained in the products supplied.

For this purpose, suppliers shall establish a policy and management system to reasonably assure that the Conflict Minerals which may be contained in the products they deliver, are sourced responsibly.

Suppliers shall exercise due diligence in accordance with the guidelines of the OECD (www.oecd.org) on relevant materials in their supply chains and shall develop particular due diligence policies and management systems in order to identify applicable risks and take appropriate steps to mitigate them.

6. BUSINESS INTEGRITY

Business Partners shall conduct business in compliance with internationally agreed standards on business ethics and adhere to applicable business integrity laws and regulations.

Prohibition of all forms of corruption

The Group conducts its business in a transparent, honest and ethical manner and, as such, does not tolerate, permit, or engage in any form of bribery or corruption. The Group is firmly opposed to any irregular payments in its business relationships and prohibits corruption in any form whatsoever, including influence-peddling, and intends to prevent it by complying with the anti-corruption laws applicable in each country in which the Group operates.



Business Partners shall neither engage in nor tolerate any form of corruption such as the offering, giving, solicitation or the acceptance of any bribe, (whether in cash or in the form of any other inducement) to or from any person or company, wherever located and whether a public official or public body, a private person or company, an agent or any other person or body acting on our behalf, in order to obtain a commercial, contractual or regulatory advantage in an unethical manner or to obtain any personal benefit.

Prevention of conflict of interest

Business Partners shall avoid conflicts of interest and shall disclose to the Group any information regarding real or potential conflicts of interest relating to their activities.

Respect of competition laws

Business Partner must operate in compliance with the competition, antitrust and trade rules applicable in each country where they operate. Business Partner shall respect and comply with applicable competition laws and regulations, including an obligation not to exchange commercially sensitive and strategic information with competitors or to enter into anti-competitive agreements with any business partner

Export control and sanctions

Business Partners shall comply with applicable laws and regulations regarding export control and export restrictions, as well as relevant economic sanctions.

Prohibition of money-laundering

Business Partner must take all appropriate measures to prevent their operations from being used as vehicles for money-laundering.

Protection of intellectual property rights and business confidentiality

Business Partners shall protect confidential information, collected for or by the Group and shall protect the Group's intellectual property rights by safeguarding it against misuse, theft, fraud or improper disclosure. This includes patents, trademarks, copyright, and trade secrets.

7. PRIVACY AND PERSONAL DATA PROTECTION

Business Partners must take all appropriate measures to comply with all applicable laws and regulations regarding privacy and personal data protection. Business Partners are required at all times to use personal information appropriately for the purposes of their business and to protect it from misuse.

8. REPORTING

Business Partners should report any illegal or improper conduct in connection to its business with the Group through the e-mail: compliance@2rholding.com

The Group gives warranty regarding the confidentiality of the identity of whoever makes the report in good faith and / or refuses to carry out or begin actions that violate this Code.



Business Partners also undertake to maintain the documentation and /or information necessary to substantiate the reports mentioned above. The Group reserves the right to verify such documentation if considered necessary.

9. COMPLIANCE WITH THE CODE

Business Partners shall provide upon request any supporting documentation or information attesting compliance with this Code.

Suppliers shall grant the Group the right to evaluate their compliance with the principles set forth in this Code upon reasonable prior notice. The evaluation shall be performed directly by the Group or by a duly mandated third party in the form of an audit.

Business Partners shall provide all necessary information and facilitate access to representatives seeking to verify compliance with the requirements of this Code. Business Partners undertake to improve or correct any deficiencies detected.

In the event of non-compliance with this Code by a Business Partner, 2 Ride Group or companies of the 2 Ride Group which has a business relationship with, reserves the right to require correction by implementing a non-compliance recovery plan, to conduct documentary audits and/or additional audits to ascertain the actual implementation of the above recovery plan, within the prescribed timeframe or to suspend relationship until the non-conformities have been corrected.

In the event of the Business Partner violates the Code, or in the event of non-compliance and the anticipated improvement plans are not being prepared and carried out, the Group reserves the right to suspend and/or resolve in advance with immediate effect any commercial and business relationship.

In the event of non-compliance with one or more provisions of the Code, or if the planned improvement plans are not implemented, the Group reserves the right to render void or terminate in advance with immediate effect the commercial and business relationship.



BUSINESS PARTNER'S COMMITMENT

As a condition of doing business with an entity within the Group 2 Ride, the below Business Partner certifies that it will comply with this Code and its requirements.

Date: _____

Company name: _____

Address: _____

Legal representative's name and position: _____

Legal representative's email (optional) : _____

Representative Signature: _____

Stamp (if applicable):