

Virtual Access Supplier Code of Conduct

Issue: 1.0
Date: 01 November 2021

Virtual Access Supplier Code of Conduct

Virtual Access is committed to the highest levels of legal, ethical and moral standards, which we set out in our Code of Conduct. We place business ethics and Corporate Social Responsibility at the forefront of all our business dealings, including those with our suppliers, both direct and indirect, recognising that they are key stakeholders in the success of our business. Virtual Access expects suppliers to share our desire to be the best, to be innovative and efficient and quality driven.

We only choose suppliers who share our unwavering commitment to good ethical practices and who meet our standards in respect of human rights, health & safety and environmental stewardship. This Supplier Code of Conduct sets out these Corporate Sociability Responsibility requirements and how we want to ensure your compliance.

Virtual Access Commitment to Suppliers

Virtual Access seeks to engage in long-term relationships with suppliers that are committed to sustainable development. Our goal is to partner with suppliers to deliver value-for-cost procurement for Virtual Access and our customers, and to demonstrate responsible supply chain management.

Virtual Access strives to be a fair and honest partner, firmly believing that relationships built on these core values of trust and integrity will be sustainable and beneficial for all.

When carrying out procurement duties and responsibilities, all Virtual Access employees are expected to share with suppliers the company's commitments to high legal, ethical and moral standards.

Compliance with Laws and Regulations

Virtual Access does business throughout the world.

The supplier must recognise that Virtual Access' obligations and requirements extend to all countries where Virtual Access does business, and that in some cases, Virtual Access and its suppliers are required to conduct business in accordance with the laws of other countries in which Virtual Access operates.

Ethics and Conflicts of Interest

Virtual Access suppliers shall conduct their business, directly through its employees and officers, and indirectly through third parties in an ethical manner and act with integrity at all times using the highest ethical standards, and treat its employees, agents, contractors and customers with dignity.

Business Integrity and Fair Competition

Virtual Access suppliers shall not utilise bribery and corruption in conducting their business. Suppliers shall not offer or provide, either directly or indirectly, or request, agree to receive or accept any undue pecuniary or other advantage for the purpose of obtaining, retaining, directing or securing any commercial, contractual, regulatory or personal advantage.

It includes any financial or other vantage given or requested for the improper performance of a public function or business activity.

Forced or Involuntary Labour

Virtual Access suppliers shall be committed to uphold the human rights of workers and to treat them with dignity and respect.

Freely Chosen Employment

Virtual Access suppliers shall not use forced or involuntary labour of any type (e.g., forced, bonded, indentured or involuntary prison labour); employment is voluntary.

Child Labour and Young Workers

Virtual Access suppliers shall not use child labour. The term "child" refers to any person employed under the age of 16, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Virtual Access supports the use of legitimate workplace apprenticeship programs which comply with all laws and regulations applicable to such apprenticeship programs.

The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment or the age established for completing compulsory education.

Non-Discrimination

Virtual Access suppliers shall make no distinctions in hiring and employment practices on the grounds of race, colour, nationality, ethnic or national origin, gender, marital status, sexual orientation, age, religion or belief or disability.

Discrimination

Virtual Access supplier shall not discriminate against any worker based on race, colour, nationality, ethnic or national origin, gender, marital status, sexual orientation, age, religion or belief or disability is not tolerated.

Fair Treatment

Virtual Access suppliers shall provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical oppression or verbal abuse of workers and no threat of any such treatment.

Wages, Benefits and Working Hours

Virtual Access suppliers shall pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall communicate with their employees the basis on which they are being compensated in a timely manner.

Virtual Access suppliers are also expected to communicate with their employees whether overtime is required and the wages to be paid for such overtime.

Freedom of Association

Open communication and direct engagement with employees to resolve workplace and compensation issues is encouraged. Virtual Access suppliers shall respect the rights of employees, as set forth in local laws, to associate freely, join or not join labour unions, seek representation and join workers' councils. Employees shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers shall employ fair business practices, including accurate and truthful advertising.

Identification of Concerns

All employees should be encouraged to report concerns or illegal activities in the workplace, without threat of reprisal, intimidation or harassment. Virtual Access suppliers shall investigate and take corrective action if needed.

Animal Welfare

Animals shall be treated respectfully, with pain and stress minimised. Animal testing should be performed after consideration to replace animals, reduce the numbers of animals used or refine procedures to minimize distress. Alternatives should be used wherever scientifically valid and acceptable to regulators.

Privacy

Virtual Access suppliers shall safeguard and make only proper use of confidential information to ensure that company's employees and customer's privacy rights are protected.

Health and Safety

Virtual Access suppliers shall provide a safe and healthy work place for their employees and subcontractors.

Suppliers must have documented health and safety policies and/or procedures in place together with appropriate safety infrastructure and equipment.

Employee Protection

Suppliers shall protect their employees from over exposure to chemical, biological and physical hazards, physically demanding tasks in the workplace and in any company-provided living quarters.

Process Safety

Suppliers shall have programs in place to prevent or mitigate catastrophic releases of chemicals.

Emergency Preparedness and Response

Suppliers shall identify and assess emergency situations in the workplace and any company provided living quarters, and minimise their impact by implementing emergency plans and response procedures.

Hazard Information

Safety information relating to hazardous materials shall be available to educate, train and protect workers from hazards.

Consistent with these obligations, Virtual Access suppliers must have and implement effective programs that hold within life safety, incident investigation, chemical safety, ergonomics, etc. Suppliers should strive to implement management systems to meet these requirements.

Environment

Virtual Access suppliers shall operate in an environmentally responsible and efficient manner, and they shall minimise adverse impacts on the environment. Virtual Access encourages the conservation of natural resources, avoiding the use of hazardous materials where possible and engaging in activities that reuse and recycle.

At a minimum, suppliers must comply with all applicable environmental laws, regulations and standards, such as requirements regarding chemical and waste management and disposal, recycling, industrial waste water treatment and discharge, air emissions controls, environmental permits and environmental reporting.

Suppliers must also comply with any additional environmental requirements specific to the products or services being provided to Virtual Access as called for in design and product specifications, and contract documents.

Environmental Authorisations

Virtual Access suppliers shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed.

Waste and Emissions

Virtual Access suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges.

Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

Spills and Releases

Virtual Access suppliers shall have systems in place to prevent and mitigate accidental spills and releases to the environment.

Conflict Minerals

Virtual Access suppliers will ensure that the materials (tin, tantalum, tungsten and gold) used in components and products supplied are conflict-free. Suppliers must assure the procurement of these metals does not directly or indirectly finance or benefit illegal armed groups through mining or mineral trading.

Supplier will cooperate in due diligence requests made by Virtual Access with respect to the origin of intermediaries associated with the purchases of materials or products containing conflict minerals, whether or not those materials or products may have been mined or produced in the covered countries or obtained from recycled sources. Where specified in a purchase order or supply agreement, the supplier will comply with any Virtual Access requirement to provide products, components, parts and materials which are free of conflict minerals mined or produced in the covered countries in support of armed conflict in the region.

Continual Improvement

Virtual Access suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.

Suppliers shall support Virtual Access in these efforts through giving Virtual Access early visibility and access to innovations.

Management, Monitoring and Evaluation

Suppliers shall use management systems to facilitate continual improvement and compliance with the expectations of this code.

Legal and Customer Requirements

Virtual Access suppliers shall identify and comply with applicable laws, regulations, standards and relevant customer requirements.

Compliance with Export Laws

Virtual Access suppliers shall comply with all export laws, regulations and administrative determinations of the exporting country. If any Virtual Access supplier is the exporter of record for any shipments, the supplier shall obtain all export authorisations from governments that may be required to lawfully make such shipments.

Imports and Customs

Virtual Access suppliers shall comply with all import and customs laws, regulations and administrative determinations of the importing country.

Risk Management

Suppliers shall have mechanisms to determine and manage risks in all areas addressed by this document.

Documentation

Virtual Access suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

Training and Competency

Virtual Access suppliers shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to address these expectations.

Economic Sustainability

Suppliers shall continually identify and recommend ways to deliver value to Virtual Access that have the potential to result in a competitive advantage (e.g. reduce cost and/or improve efficiencies).

Supplier Diversity

Suppliers shall engage socially and economically different categories of suppliers through inclusive sourcing processes that promote equal opportunities.

Traceability of Production

Virtual Access suppliers shall not assign any work to third parties without the prior written authorisation of Virtual Access. Those who outsource any work shall be responsible for the enforcement of the code by these third parties and their employees.

Protection of Intellectual Property

Virtual Access suppliers must respect intellectual property rights, including patents, trademarks, copyrights and process designs, and safeguard Virtual Access' confidential and proprietary information. Any transfer or sharing of technology or know how must be done in a manner that protects intellectual property rights and is in compliance with local laws, including export laws, concerning data privacy and security. Suppliers shall respect intellectual property rights and safeguard customer information. Suppliers shall manage technology and know-how in a manner that protects intellectual property rights.

Disclosure of Information

Virtual Access suppliers shall accurately record information regarding its business activities, labour, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties.

Confidentiality of Information

Virtual Access suppliers shall preserve the integrity and confidentiality of the information they may receive as a consequence of their commercial relationship with Virtual Access. Suppliers will comply with all local laws concerning data security and privacy, and will protect and safeguard data provided by Virtual Access, which may include private and sensitive personal information. Any transfer or sharing of data must be done in a manner that protects such information from inadvertent or unauthorised disclosure and any disclosure must be in compliance with local laws

The obligation of confidentiality will remain once the relation with Virtual Access is terminated and it will include the obligation to return any material related to the company held by the supplier.

Violation of this Supplier Code of Conduct

Virtual Access encourages all their suppliers to improve their business practices in accordance with the principles set out in this Code of Conduct.

If a supplier violates any of the requirements contained in this Supplier Code of Conduct, Virtual Access may immediately terminate its supply relationship with that supplier.

Any questions related to this Supplier Code of Conduct can be addressed by email at: suppliers@virtualaccess.com or tel: +353 1 604 1800.