

DATAMARS CHILD LABOUR GUIDELINES

1 Purpose and Scope

The Datamars Group (“**Datamars**”, “**we**”, “**us**”, “**our**”) is committed to promoting responsible sourcing practices and respecting human rights in all our operations worldwide and throughout our global supply chain. These Guidelines include our commitment to responsible sourcing and our approach towards the avoidance of “Child Labour” in our supply chain. These Guidelines serve as a key element of Datamars’ responsible supply chain framework, established to identify and manage potential child labour risks within Datamars’ supply chain.

Child labour is a violation of a human rights, and it is recognised and defined by international organisations. International standards distinguish acceptable and unacceptable work for children at different ages. According to ILO, the term “child” means any person employed under the age of 15, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply.

2 Application

These Guidelines apply to all sites, workers and employees of Datamars and its suppliers (including permanent, temporary, agency and migrant workers), as well as subcontractors, agents and subsidiaries. We expect our suppliers to communicate the requirements of these Guidelines through their own supply chains down to the primary production level, to ensure that they too comply with the principles set out in the Guidelines.

3 Commitment to responsible procurement and measures

We adhere to high ethical standards and respect human rights. Datamars is committed to refraining from any type of child labour in its own business and own production sites and shall take the following steps to mitigate any risk towards the use of child labour.

Datamars has zero tolerance for any form of human rights abuse including child labour or underage labour and therefore our Supplier Code of Conduct (SCoC) requires suppliers not to, under any circumstance, have children within their workforce and to investigate when there are reasonable grounds to suspect that child labour may be occurring. Therefore, Datamars implements several elements to prevent Child labour and to ensure compliance throughout our supply chain.

To date, in pursuit of these commitments, we have taken a number of measures including:

- updating Datamars SCoC.
- adopting this Child Labour Guidelines.
- raise awareness internally around child labour to support the identification and management of potential child labour risks within its supply chain.
- requiring our suppliers to comply with and implement their own supplier Code of Conduct and policies regarding child labour and to exercise due diligence to investigate the presence of children in their own supply chain.
- engaging with our suppliers so that they respond in a timely manner to our requests for evidence of compliance.
- requesting suppliers to provide us with necessary information relating to any suspicion or risk of child labour.

4 Roles and Responsibilities

In order to facilitate and ensure compliance with the Regulations, under the oversight of Management and our ESG Steering Committee, Datamars created a multi-functional team. The team has the overall responsibility for developing, implementing and reviewing our child labour compliance strategy, as well as for ensuring systems are in place for the reviewing and reporting of ongoing progress and effectiveness of the child labour policies.

5 Supplier management system

Datamars implements a global human rights assessment program to conform with the framework described in the Regulations and to assess the use of child labour in our operations and supply chain and to be in a position to fulfil our obligations and respond to customer inquiries. This program includes the following tasks:

- **Establishing Policies and Procedures.**

Datamars has established internal policies and procedures to ensure that the required due diligence is performed on its suppliers and the results are taken into account for the supplier selection and/or award process. In addition, Datamars has established the SCoC to also engage its suppliers in compliance with the Regulations and to support Datamars in its efforts to comply and adhere to the Regulations.

- **Due Diligence**

The principles of these Guidelines are based on supplier engagement, through dialogue and mutual trust, and Datamars promotes as much as possible transparency and working in collaboration with its suppliers. Datamars conducts supply chain due diligence on child labour. This due diligence will include:

- **Identification and Risk Assessment:** We will identify and address any risks of child labour in our supply chain.
- **Supplier Engagement:** We will work closely with our suppliers to communicate our expectations and requirement regarding the child labour. We will request our suppliers to provide information about all places of production/work sites (including their sub-suppliers), and we will encourage them to adopt responsible sourcing practices.
- **Supplier Audits and documentation:** We may request our suppliers to provide us with additional documentation, self-assessment or conduct audits of their facilities to verify the accuracy of the information provided and ensure compliance with these Guidelines. We will also encourage our suppliers to obtain third-party certifications, to validate responsible sourcing practices.

- **Training**

Datamars will provide training to its employees and suppliers to raise awareness of the human right and especially the child labour and the importance of responsible sourcing, if necessary.

- **Continuous Improvement**

Datamars will continuously monitor and review its policies and procedures to ensure that they remain effective in addressing the issue of child labour and reflecting industry best practices and regulatory requirements. Datamars will work with its suppliers to improve their due diligence processes and encourage them to adopt responsible sourcing practices.

6 Risk management

In cases where child labour risk is assessed or there is suspicions of child labor in our supply chain, we will take appropriate measures to mitigate the risk, including:

- **Supplier improvement:** We will work with suppliers to address identified risks and support their efforts to improve responsible sourcing practices. We will encourage them to develop and implement a policy regarding child labour and exercise due diligence to investigate any presence of child labour and strengthen their supply chain transparency.
- **Sourcing alternatives:** If we determine that a supplier cannot or will not comply with these Guidelines, we will seek alternative suppliers that demonstrate a commitment to responsible sourcing.

7 Implementation and enforcement

These Guidelines are in force as of 1st of January 2024. The implementation and enforcement of these Guidelines in the supply chain is supported by the SCoC.

These Guidelines outline our position on child labour and its alignment with various regulations, including the Swiss Code of Obligations, Swiss Due Diligence and Transparency Ordinance (DDTrO), ILO Convention or any other applicable regulation (collectively referred to as "Regulations").

8 Whistleblower system

We expect our suppliers to immediately communicate any potential or effective failure to comply with these Guidelines and any applicable laws, regulations or any contractual agreements with Datamars. This includes violations by any employee, adviser, partner, agent or any other representative acting on behalf of either the supplier or Datamars. Reports can be made through email directly to GroupComplianceOfficer@datamars.com or through an independent web-based channel <https://datamars.integrityplatform.org/>.