

Midis Group - Supplier Code of Conduct

Introduction

At Midis Group, we work collaboratively with our Supplier to conduct business with integrity and transparency. The following guidelines set forth the framework of acceptable conduct Midis Group expects from its Supplier.

These guidelines are based on Midis Group's commitment to integrity and sustainability as expressed in our internal Code of Conduct mandatory for all our employees. All business transactions through a member of Midis Group's environment must not only be in full compliance with this Supplier Code of Conduct, and all applicable laws, rules, regulations and policies but also go beyond pure legal requirements; Midis Group is depending on Supplier with a reputation as serious business professionals who act fairly, ethically, and correctly in all business activities.

Furthermore, Midis Group requires that Suppliers (1) implement effective business controls that prevent and detect unlawful conduct; (2) comply with and agree to contractual provisions that require strict adherence to all applicable anti-corruption laws and other laws that are relevant to their business; (3) grant Midis Group audit rights to review the Supplier' compliance with such laws; and (4) to the extent they become aware, proactively report to Midis Group actual or potential violations of this Supplier's Code of Conduct.

Definition

The term Supplier as used in this policy comprises all entities providing a service or product whether to or on behalf of Midis Group.

The term Supplier includes the Supplier's employees, temporary employees, and any party acting on behalf of the Supplier.

I. Compliance with Laws

1- Anti-Corruption Laws

Supplier must comply with all relevant anti-bribery, anti-kickback, and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and those in effect in jurisdictions where the Supplier operates.

Supplier shall not make, authorize or offer any bribes, kickbacks, or payments of money or anything with a value which is construed as a bribe or improper inducement, either directly or indirectly through a third party to anyone, including officials, employees or representatives of any government or public or international organization, or to any other third party (public or private sector) in order to improperly obtain or retain business or otherwise gain an advantage.

Suppliers are required to have an internal Business Amenity policy in place with defined thresholds to ensure all expenditure (i.e., gifts, meals, or entertainment) offered to or received by Midis Group employees or third parties is in the ordinary course of business, is given openly and transparently, and is not unlawful or contrary to ethical business principles. Suppliers must ensure that such policies are consistently reviewed and updated to promote ethical business practices and adhere to relevant laws and regulations.

I. Compliance with Laws (continued)

2- Anti-trust and Competition Laws

Supplier must comply with all applicable anti-trust and competition laws. Generally, such laws prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or unreasonably reduce competition.

Supplier must not share with market participants Midis Group internal matters, such as pricing and conditions of sale, costs, and overviews of the market, organizational processes, or other confidential information, from which other market participants could draw competitive advantage over Midis Group.

Supplier may only use legal means to gather information about products and plans of market participants which is identified or identifiable as confidential information.

3- Intellectual Property Laws

Supplier must not infringe Midis Group trademarks and other intellectual property rights. Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and Midis Group and the product's Vendor information is to be safeguarded.

4- Human Rights, Labor Laws, and Labor Practices

Suppliers should respect internationally recognized human rights of individuals within their company and their supply chain. This means they must comply with the Health and Safety Regulations, laws upholding the rights of persons with disabilities, Domestic and International Labor Laws, Fair Labor Practices and Human Trafficking Laws. Notably, all Suppliers must, without limitation, prohibit discrimination, the use of child labor, and the use of forced labor.

5- Trade Compliance Laws and Regulations

Supplier must comply with all applicable economic, financial, and trade sanctions as well as import and export control laws and regulations in the countries of operation when dealing with Midis Group. Supplier will not provide controlled technologies, products, or technical data to Midis Group, without providing notice of such controls as necessary for Midis Group to maintain compliance with applicable laws.

II. Business Conduct

1- Financial Integrity

Accurate and reliable financial and business records are of critical importance in meeting Midis Group's financial, legal, and business obligations. Supplier should not have any false or inaccurate entries in the accounting books related to transactions with Midis Group for any reason.

Supplier's business records must be retained in accordance with record retention policies and all applicable laws and regulations.

III. Business Conduct (continued)

2- Conflicts of interest

Any circumstance in which the Supplier's ability to act objectively is compromised is considered a conflict of interest. While engaged in work related to Midis Group, the Supplier must exercise reasonable care and diligence to avoid any actions or situations that could result in a conflict of interest.

IV. Safeguarding of Midis Group resources

3- Confidential information

Midis Group's confidential information must be protected and shall be used by Supplier to perform work activities only. Supplier should not use this information for gain or advantage, and never share this information without appropriate approval from Midis Group.

Suppliers are expected to safeguard confidential information by not reproducing copyrighted software, documentation, or other materials without permission, and not transferring, publishing, using or disclosing it other than as necessary in the ordinary course of business or as directed or authorized.

4- Data privacy

Suppliers must comply with all applicable privacy and data protection laws and regulations. Materials that contain confidential information or which are protected by privacy standards should be stored securely and should be shared only internally with those employees on a need-to-know basis.

V. Health and Safety

Supplier must ensure compliance with all applicable occupational health and safety laws and regulations. Supplier recognizes that providing a safe and healthy work environment will enhance the quality of services, consistency of production and workers' morale and shall prevent Supplier's exposure to potential safety hazards.

VI. Environment

Supplier will comply with all applicable environmental regulations and laws and will strive to run the business operations in a manner that minimizes any adverse impact on the environment.

Supplier also must comply with all applicable laws and regulations regarding the prohibition or restriction of specific substances in the manufacturing process, products, or packaging.

VII. Compliance Management System

Supplier shall adopt or establish a management system whose scope is related to the content of this Supplier Code of Conduct. Supplier agrees to provide information and evidence tied to their Compliance Management Systems to Midis Group, in case of doubt of breach or actual breach of the terms under this Supplier Code of Conduct.

The Compliance management system shall be designed to ensure: (1) Compliance with applicable laws, and regulations (2) Documentation of the conformance with this Supplier Code of Conduct's requirements.

VIII. Reporting concerns and raising questions

Suppliers should contact Midis Group if they have any questions about this Supplier Code of Conduct.

Suppliers are also expected to report to Midis Group any suspected or actual violations of applicable laws or regulations or this Code.

Communications should be sent to the following email: compliance@midisgroup.com .