



SUPPLIER CODE OF CONDUCT

Nexeye is a European leader in optical retail, on a mission to make good eye- and hearingcare affordable and easily accessible for all. Our brands Hans Anders, eyes + more and Direkt Optik and our world class partnerships share a vast pool of talent and resources, shaping our vision into a visible reality for all stakeholders.

Supplier Code of Conduct

This Supplier Code of Conduct, a key part of our ESG strategy, sets out the principles of Nexeye group and expectations as to how organizations who supply goods and services to Nexeye, including their (subsidiaries) representatives and employees, are to conduct business with. The relations with suppliers are regulated by the rules of this Code of Conduct and are subject to constant and attentive monitoring by Nexeye Group itself. By accepting, suppliers are expected to implement our Supplier Code of Conduct in their organization and to monitor employee and supplier compliance.

ESG AMBITION; A FUTURE IN VIEW OF GOOD EYESIGHT FOR ALL

Nexeye is taking responsible entrepreneurship seriously and aims to make a lasting difference for all stakeholders and the planet we live on. There is a power that lies within us, connecting and combining our abilities to effectively and credibly generate positive impact on the world around us. This is embedded in our mission 'Value in view of the future'.

Our ambition is to contribute to a future in view of good eyesight and hearing for all. Helping people to see better, and by consequence be better seen. Giving them a better chance as developing individuals. So we will do everything within the scope of our abilities as a company, to make good eyesight a reality for as many people as we can.

We – at Nexeye – take the long view and see change coming. That's why we are creating an in depth, impactful ESG strategy, based on our economic, social and governance priorities and the international Sustainability Development Goals. To this end, we seek to collaborate with (among others) partners and suppliers that care for circularity, reducing waste and CO2 emissions and that are keen on human rights and working conditions of employees.

VALUE IN VIEW OF THE FUTURE

The Board of Nexeye Group therefore approved the Supplier Code of Conduct which aims to confirm and fix in a document the principles of correctness, loyalty, integrity and transparency in behaviour and in the way of operating and conducting relations towards suppliers and based on which Nexeye Group selects its suppliers.

Nexeye and all its subsidiaries: HARG Holding BV, Hans Anders Nederland BV, Hans Anders Belgie BV, Eyes & More Groep, Eyes & More Holding, Eyes & More BV, Eyes & More Dach GmbH, Eyes & More GmbH, Eyes & More Ostereich GmbH, Eyes & More Belgie BV, Momentai Ltd, Direkt Optik AB. This document refers to Nexeye Group.

Human rights and working conditions

In accordance with the ILO Conventions, the United Nations' Universal Declaration of Human Rights, the UN's Conventions on children's rights and the elimination of all forms of discrimination, the UN Global Compact and the OECD Guidelines for Multinational Enterprises, the Nexeye Group Code of Conduct aims to attain compliance with certain social and environmental standards. The following requirements are of particular importance and are implemented in a developmental approach:

1. Legal compliance

Compliance with all applicable national laws and regulations, industry minimum standards, ILO in the components where referred to and UN Conventions, and any other relevant statutory requirements whichever requirements are more stringent.

2. Freedom of association and the right to collective bargaining

The right of all personnel to form and join trade unions of their choice and to bargain collectively shall be respected. In situations or countries in which the rights regarding

freedom of association and collective bargaining are restricted by law, parallel means of independent and free organisation and bargaining shall be facilitated for all personnel. It shall be ensured that representatives of personnel have access to their members in the workplace.
- In accordance with ILO conventions 87, 98, 135 and 154.

3. Prohibition of discrimination

No discrimination shall be tolerated in hiring, remuneration, access to training, promotion, termination or retirement based on gender, age, religion, race, caste, social background, disability, ethnic and national origin, nationality, membership in workers' organisations including unions, political affiliation, sexual orientation, or any other personal characteristics.
- In accordance with ILO conventions 100, 111, 143, 158 and 159.

4. Compensation

Wages paid for regular working hours, overtime hours and overtime differentials shall meet or exceed legal minimums and/or industry standards. Illegal, unauthorised or disciplinary deductions from wages shall not be made. In situations in which the legal minimum wage and/or industry standards do not cover living expenses and provide some additional disposable income, supplier companies are further encouraged to provide their employees with adequate compensation to meet these needs. Deductions from wages as a disciplinary measure are forbidden. Supplier companies shall ensure that wage and benefits composition are detailed clearly and regularly for workers; the supplier company shall also ensure that wages and benefits are rendered in full compliance with all applicable laws and that remuneration is rendered in a manner convenient to workers.
- In accordance with ILO conventions 26 and 131.

5. Working hours

The supplier company shall comply with applicable national laws and industry standards on working hours. Overtime hours are to be worked solely on a voluntary basis and to be paid at a premium rate.

6. Workplace health and safety

A clear set of regulations and procedures must be established and followed regarding occupational health and safety, especially the provision and use of personal protective equipment, clean bathrooms, access to potable water and if appropriate, facilities for food storage shall be provided. Workplace practice and conditions and conditions in dormitories which violate basic human rights are forbidden. In particular young workers shall not be exposed to hazardous, unsafe or unhealthy situations. Everyone must take actions to create a safe workplace and follow strictly the instructions imposed by the local government and/or Nexeye Group in case of health pandemic.

7. Prohibition of child labour

Child labour is forbidden as defined by ILO and United Nations Conventions and/or by national law. Of these various standards, the one that is the most stringent shall be followed. Any forms of exploitation of children are forbidden. Working conditions resembling slavery or harmful to children's health are forbidden. The rights of young workers must be protected. In the event that children are found to be working in situations which fit the definition of child labour above, policies and procedures for remediation of children found to be working shall be established and documented by the supplier company. Furthermore, the supplier company shall provide adequate support to enable such children to attend and remain in school until no longer a child.

- In accordance with ILO Conventions 79, 138, 142 and 182 and Recommendation 146.

8. Prohibition of forced labour and disciplinary measures

All forms of forced labour, such as lodging deposits or the retention of identity documents from personnel upon commencing employment, are forbidden as is prisoner labour that violates basic human rights. The use of corporal punishment, mental or physical coercion and verbal abuse is forbidden.

- In accordance with ILO Conventions 29 and 105.

9. Environment and safety Issues

Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, emissions and effluent treatment must meet or exceed minimum legal requirements.

10. Management systems

The supplier company shall define and implement a policy for social accountability, a management system to ensure that the requirements of the Nexeye Group Code of Conduct can be met as well as establish and follow an anti-bribery / anti-corruption policy in all of their business activities. Management is responsible for the correct implementation and continuous improvement by taking corrective measures and periodical review of the Code of Conduct, as well as the communication of the requirements of the Code of Conduct to all employees. It shall also address employees' concerns of non compliance with this Code of Conduct.

11. Procurement ethical standards

The responsibility of the purchasing department is to promote fair and ethical business practices and provide assistance in support of the policy. The procurement ethical standards are:

- Conducting business with potential and current suppliers in an atmosphere of good faith.
- According a prompt and courteous response to all who call on legitimate business.
- Creating an environment of fair, ethical, and legal business practices.
- The supplier company must maintain confidentiality in all deals.

12. Fraud

The direct contact between Nexeye Group and the supplier companies selling goods or services is an area, which is particularly vulnerable to fraud. It is therefore critical to protect Nexeye Group and all its employees, by the use of strict and formal procedures for obtaining

quotations, authorizing purchasing expenditure, recording the receipt and acceptance of goods and services and the clearance of invoices for payment.

Protection of confidential and privileged information, protection of personal data and cybersecurity

13. Processing personal data (GDPR)

Nexeye Group commits to the proper application of the GDPR and takes its responsibility with respect to the fair and transparent processing of personal data, the legitimate interests pursued by controllers in specific contexts, the collection and pseudonymisation of personal data, the information provided to the public and to data subjects, the exercise of the rights of data subjects, the information

provided to, and the protection of, children, and the manner in which the consent of the holders of parental responsibility over children is to be obtained.

We expect our suppliers to take the same full responsibility with to correct application of GDPR legislation.

Nexeye group complies to the measures and procedures referred to in Articles 24 and 25 and the measures to ensure security of processing referred to in Article 32 GDPR, the notification of personal data breaches to supervisory authorities and the communication of such personal data breaches to data subjects, the transfer of personal data to third countries or international organizations, out-of-court proceedings and other dispute resolution procedures for resolving disputes between controllers and data subjects with regard to processing, without prejudice to the rights of data subjects pursuant to Articles 77 and 79 GDPR.

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CONSEQUENCES OF NON-COMPLIANCE

If a supplier fails to meet the requirements of the Nexeye Group Code of Conduct, and if no solutions can be agreed upon and implemented within a reasonable amount of time, Nexeye Group may choose to halt current production, cancel corresponding contracts, suspend future contracts and/or terminate the business relationship with the non-conforming supplier. If an audit reveals less than full compliance with the Nexeye Group Code of Conduct, the supplier must take the prescribed corrective actions without delay. The period of time the supplier has to implement these corrective measures will be agreed upon with the auditors, but may not exceed twelve months unless mutually agreed. If a supplier excluded in the past on grounds of non-compliance shows later that it can comply fully with the Nexeye Group Code of Conduct, there is, in principle, no reason why a business relationship cannot be resumed.