

Sourcing Code of Conduct

Responsible Sourcing Requirements

VIGA's commitment to responsible business extends to ensure that our ethical standards are integrated into our sourcing activities and decisions worldwide. This commitment to responsible sourcing is reflected in our Sourcing Code of Conduct which requires that we work only with suppliers who embrace standards of ethical behavior that are consistent with our own and our customers.

We believe in developing mutually beneficial relationships with our suppliers. We recognize that they are important partners in our success, and we treat them with honesty, fairness and respect. We also expect that they will conduct business activities for or on behalf of the Company in accordance with business standards and values that align with our own and our customers.

Our supplier selection criteria, apart from technical capabilities for a particular product, include:

- Leadership within the industry
- High quality, action-oriented management
- Outstanding quality management
- Commitment to superior customer service and customer satisfaction
- Continuous improvement philosophy for cost, quality and lead times
- Track record of innovation for product technology, manufacturing processes and business processes
- Willingness to share and adopt best practices
- Relentless drive to be a low-cost producer
- Managing the business for the long term
- Excellent environment and safety profile
- Proactive member of the community
- A company or organization that we are proud to recommend to others.

Performance Requirements from Suppliers

VIGA's suppliers are expected to manage their activities systematically in order to meet the operating standards. The following defines the expectations that VIGA has from its suppliers with respect to responsible sourcing.

As such, they should:

- Demonstrate top management commitment through policies, objectives, and formal processes for management review.

- Implement processes to control documents and records.
- Provide resources, including competent personnel and appropriate infrastructure, to ensure conformance to these standards.
- Implement processes to control the production of VIGA's products, manage change effectively and ensure customer requirements are satisfied.
- Implement processes to manage nonconformity and emergency situations related to products, processes and these standards, including the reporting -of such events to applicable regulatory authorities and VIGA as appropriate.
- Identify and implement improvement actions, including effective complaint investigation and corrective action processes.
- Develop and implement appropriate business continuity plans for operations supporting VIGA products

Ethical Requirements from Suppliers & VIGA Employees

VIGA employees managing sourcing, other general VIGA employees, and VIGA suppliers are required to prevent conflicts of interest and avoid circumstances that pertain thereto. Any circumstance that could cast doubt or the appearance of doubt on VIGA employee's and VIGA supplier's ability to act with total objectivity with regard to the genuine business interests is considered a potential conflict of interest. VIGA employees and suppliers are required to avoid such circumstances and prevent conflicts of interest.

VIGA employees and members of their family shall not accept gifts, gratuities, entertainment, travel or hospitality from a supplier. Dinners and luncheons that provide a continuity of business discussions are allowed as time saving expediency. Gifts of inconsequential value such as calendars, pens, note pads, appointment books, may be accepted in circumstances where such minor gifts are customary.

Supplier's team dealing with VIGA and other their employees engaged directly or indirectly in any business transaction with VIGA, shall not seek to profit from confidential information or business opportunities made known to them as a result of the transaction.

VIGA team dealing with suppliers and other VIGA employees engaged directly or indirectly in any business transaction with supplier, shall not seek to profit from confidential information or business opportunities made known to them as a result of the transaction.

VIGA employees engaged in sourcing processes shall not disclose to any third party, or other VIGA employee without a need to know, confidential information of any kind with respect to the decisions, pricing, proceedings or other activity of the sourcing group in which they are participating.

VIGA employees or members of their family may not act as director, officer, partner, employee, agent or consultant with or without compensation, for a present or proposed supplier or customer.



VIGA employees or members of their family may not receive fees, commissions or other compensation from a supplier or competitor.

VIGA employees who have a financial interest in another entity, or who act as a director, officer, partner, employer, agent, or consultant, for another entity, may not influence or attempt to influence any business transaction between VIGA and such entity.

VIGA employees shall not solicit favors or contributions from suppliers or customers for any non-profit or charitable organization.

In appropriate cases, after full written disclosure of the facts, an exception to the foregoing standards may be authorized by the employee's supervisor if it is determined that no material conflict of interest exists. Any such exception must be reported annually to the management board member with responsibility for the employee's department.