



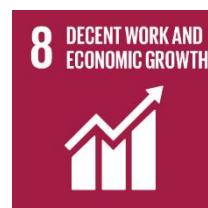
POLICY STATEMENT

A2C Services is committed to providing a working environment where the human rights of workers are upheld, and employees are treated with dignity and respect. A2C Services understands the United Nations Global Compact's ten principles in the areas of human rights, labour, environment, and anti-corruption and works towards fulfilment in this regard.

A2C Services' management and all of its' employees shall be responsible in conducting business activities in accordance with the Electronics Industry Citizenship Coalition's Code of Conduct (EICC Code), and the local Human Resources (HR) policies as applicable.

A2C Services has created value, whilst creating a more inclusive path to economic growth, prosperity and well-being. It has achieved this by full inclusion into the UN's Sustainable Development Goal. A2C Services is a participant and promotes the principles of the Circular Economy.

A2C Services understands and provides continuous strategy in reducing its' carbon footprint to help influence climate change in line with the COP21 agreement.





A2C services is committed to conducting its' business in an open, honest and professional manner. It uses the Code as its' guide to promote compliance with applicable governmental laws, rules and regulations, and the prompt reporting and correction of possible Code violations.

A2C Services shall monitor its working environment and business conduct, and will update its policy with new and amended laws and regulations as required. A2C Services shall communicate its labour, ethics policies and initiatives to employees and, where practicable, other stakeholders.

A2C Services shall encourage our contractors and suppliers, to adopt similar labour and ethics policies and practices.

A2C Services shall establish and implement objective, targets, and programs to improve our working environment and conduct audits and reviews when appropriate, to ensure adherence to this policy.

1. A2C SERVICES SHALL BE GUIDED BY THE FOLLOWING LABOUR STANDARDS

Freely Chosen Employment

Forced, bonded, or indentured labour shall not be used. All work must be voluntary and workers shall be free to terminate their employment.

Child Labour Avoidance

Child labour is not to be used. The term "child" refers to any person under the age for completing compulsory education, or under the minimum age for employment in the country.

Working Hours

Continuous overtime can cause worker strain that may lead to reduced productivity, increased staff turnover and increased chance of injury and illness. A2C Services will monitor overtime and rest day utilization, and take appropriate action to address instances deemed excessive.

Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. The basis on which workers are being paid is to be provided.

Humane Treatment

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Disciplinary policies and procedures in support of these requirements will be clearly defined and communicated to workers.



Non-Discrimination

A2C Services is committed to a workforce free of harassment and unlawful discrimination. We shall not engage in discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and in employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

Freedom of Association

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment – whether individually or as a group.

2. A2C SERVICES SHALL BE GUIDED BY THE FOLLOWING ETHICAL STANDARDS

Business Integrity

All forms of bribery, corruption, extortion and embezzlement are prohibited. All business dealings should be transparently performed and accurately reflected on A2C Services business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

No Improper Advantage

Bribes, or other means of obtaining undue or improper advantage, are not to be offered or Disclosure of Information. Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices are unacceptable.

Intellectual Property

Intellectual property rights are to be respected. The transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.

Protection of Identity

Programs that ensure the confidentiality and protection of customer, supplier and employee whistleblowers are to be maintained. A2C Services is committed to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees. A2C Services shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.



Non-Retaliation

A2C Services has communicated a process for employees to raise any concerns without fear of retaliation.

Responsible Sourcing of Minerals

A2C Services is not an original equipment manufacturer. Our sole purpose is to extend the life of original products, and by definition our clients do not buy newly manufactured product from us. The assembly of a new laptop contains minerals found in conflict zones. By using our product, the requirement to mine new minerals is removed.

We will exercise due diligence on the source of replacement parts we may need to procure, as part of our own bill of materials, to reduce or eliminate the levels of minerals needed from conflict zones.

COVERAGE

This Labour and Ethics Policy apply to all employees and suppliers of A2C Services and shall be implemented in accordance with local labour laws. A2C Services management system scope is related to the content of this Policy.

RESPONSIBILITY

Each A2C Services Regional Manager shall be responsible in fulfilling this commitment by providing direction to attain compliance with all applicable labour laws and standards.

Each local Human Resources head shall be A2C Services designated representative for labour and ethics polices, and shall be responsible for assuring and facilitating compliance with labour and ethics laws, regulations, codes, standards, and management systems. The local Human Resources representative will work with the appropriate departments to:-

- Identify, monitor and understand applicable labour and ethics laws and standards.
- Identify and assess labour practice and ethics risks associated with A2C Services operations and then develop and implement appropriate procedures to manage identified risks,
- Establish labour and ethics objectives and perform a periodic assessment to assess achievement of objectives,
- Create training programs for managers and workers to implement policies and procedures,
- Communicate information about policies and practices to stakeholders, and
- Conduct periodic self-evaluations and maintain appropriate documents and records.