



MSupport International BV

Company Code of Conduct and Compliance Statement.

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Introduction

At MSupport International, adherence to our **Code of Conduct and Compliance Statement** is the cornerstone of our business and the foundation of our identity in the marketplace. In a competitive environment where price often dominates decision-making, we distinguish ourselves by prioritizing ethics, sustainability, and social responsibility. While our products may come at a higher cost, this reflects the deliberate choices we make to work with suppliers who align with our principles and adhere to this code.

This **Code of Conduct and Compliance Statement** provides a clear framework to ensure transparency and consistency across all our business relationships, whether with suppliers or customers. It defines the standards we expect and uphold in key areas, including ethical business practices, labor rights, environmental responsibility, and compliance with applicable laws and regulations.

The scope of this document encompasses all markets where we operate, including the **European Union, United States, China, United Arab Emirates, Australia, and Canada**. It ensures compliance with region-specific regulatory frameworks such as **CE Marking, UKCA**, and other applicable environmental and labor laws, including standards set by the **United Nations, China, and the Netherlands**.

By integrating these principles into every aspect of our business, we aim to set a benchmark for responsible practices in our industry and provide clarity and assurance to all parties involved in our value chain.

Laws and Regulations

We are committed to full compliance with all applicable laws and regulations governing our operations, supply chain, and products. Our approach aims to achieve the highest standards of safety, quality, and ethical business practices.

1. Key Regulations and Standards

Laws, regulations, and frameworks we adhere to across our operations and markets include but are not limited to:

Environmental Laws:

- RoHS (Restriction of Hazardous Substances Directive)
- REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals)
- Prop 65 (California Proposition 65)
- WEEE Directive (Waste Electrical and Electronic Equipment Directive)

Labor Rights and Standards:

- ILO Core Conventions (Freedom of association, elimination of forced labor, child labor, and discrimination)
- UN Guiding Principles on Business and Human Rights
- SA8000 Standard for social accountability
- China's Labor Law
- Netherlands Labor Laws

Product Safety and Quality:

- CE Marking (EU product safety standards)
- UKCA Certification (UK safety standards)

Data Protection and Privacy:

- GDPR (General Data Protection Regulation)
- UAVG (Dutch Implementation Act for the GDPR)

Anti-Bribery and Corruption:

- UK Bribery Act 2010
- US Foreign Corrupt Practices Act (FCPA)
- EU Anti-Corruption Directive

Conflict Minerals:

- EU Conflict Minerals Regulation
- US Dodd-Frank Act (Section 1502)

2. Research Before Entering New Markets or Launching New Products

Before entering a new market or introducing a new product, we undertake thorough research to understand all applicable laws and regulations. This ensures that:

- Our products meet the legal and safety requirements of the target market.
- We comply with regional environmental, labor, and data protection standards.
- All necessary certifications and documentation are obtained prior to launch.

This proactive approach minimizes risk and ensures we meet the expectations of customers, regulators, and stakeholders in every market.

3. Product Recall and CE Regulations

We are committed to ensuring the safety, quality, and regulatory compliance of our products. In the event of a defect or safety issue:

- Identification and Notification: Issues are identified through internal reviews, customer feedback, or external audits. Customers and relevant authorities are notified promptly as required by CE regulations.
- Corrective Actions: Affected products are repaired, replaced, or recalled as necessary.
- Root Cause Analysis: Investigations are conducted to determine the cause of the issue and implement measures to prevent recurrence.
- Documentation: All recall activities are documented in compliance with CE and other applicable regulations.

4. Ensuring Compliance

To maintain the highest levels of compliance and accountability, we employ the following measures:

- Independent Testing: Products and materials are tested by certified independent laboratories to ensure compliance with safety and environmental regulations.
- Audits by Our Buying Agent: Our in-country buying agents conduct regular audits to monitor supplier compliance.
- Independent Auditing: We engage third-party auditors to verify compliance with labor, safety, and quality standards.

- Certification by Notified Bodies: Where applicable, we work with notified bodies to certify our products and processes to meet regulatory standards.

5. Quality and Compliance Management

We follow the **ISO 9001** framework to manage product quality and compliance. This provides a systematic approach to:

- Setting and monitoring quality objectives.
- Ensuring compliance with legal and regulatory requirements.
- Continually improving our processes to enhance product safety and customer satisfaction.

Anti-Bribery and Corruption Statement

We recognize that bribery and corruption undermine trust, distort competition, and contribute to unethical business practices. As such, we operate a zero-tolerance policy towards bribery and corruption in any form, whether in the public or private sectors.

1. Prohibition of Bribery

We strictly prohibit any form of bribery, whether direct or indirect, by our employees, agents, contractors, suppliers, or any third parties acting on our behalf. This includes offering, promising, giving, requesting, or receiving anything of value to influence or secure business advantages.

2. Compliance with Laws

We are committed to adhering to all applicable anti-bribery and anti-corruption laws in the countries where we operate, including but not limited to:

- The UK Bribery Act 2010
- The US Foreign Corrupt Practices Act (FCPA)
- The EU Anti-Corruption Directive
- China's Anti-Bribery Laws
- Australia's Criminal Code (Division 70)
- UAE Federal Anti-Corruption Laws

3. Gifts and Hospitality

While we recognize that business relationships sometimes involve the exchange of modest gifts or hospitality, these must never be intended to influence business decisions or create a sense of obligation. Gifts and hospitality should always be transparent, reasonable, and in line with local laws and company policies.

4. Facilitation Payments

We expressly prohibit facilitation payments—small sums paid to expedite routine or administrative government actions. These are considered bribes under international anti-corruption standards and are not permitted under any circumstances.

5. Third-Party Relationships

We require all suppliers, agents, contractors, and partners to adhere to the same anti-bribery and anti-corruption standards. We will not engage with any third party who is involved in bribery or corruption and will take appropriate action to terminate relationships where violations are discovered.

6. Reporting Violations

Any employee or business partner who becomes aware of any bribery or corruption-related activity must immediately report it through our established reporting channels. We are committed to ensuring that individuals who report violations in good faith will not face retaliation.

7. Enforcement and Consequences

Any violation of this Anti-Bribery and Corruption Policy will result in disciplinary action, up to and including termination of employment or business relationships. We will cooperate fully with law enforcement agencies in the investigation and prosecution of bribery or corruption-related offenses.

Human Labor Rights and Standards Statement

We believe that all individuals have the right to work in conditions that respect their dignity, ensure their safety, and provide fair compensation. Our commitment is guided by internationally recognized labor standards and principles, including those set out by the International Labour Organization (ILO), the United Nations Universal Declaration of Human Rights, applicable national labor laws, and the SA8000 Standard for social accountability.

1. Freedom from Forced and Child Labor

We have a zero-tolerance policy toward forced labor, bonded labor, and child labor.

- We prohibit the use of any form of forced or involuntary labor, including human trafficking and modern slavery.
- We ensure compliance with ILO Conventions No. 29 and 105 on Forced Labor, and No. 138 and 182 on the Minimum Age for Employment and the Worst Forms of Child Labor.
- As part of our commitment to SA8000, we verify compliance with requirements on child labor remediation and prevention.

2. Fair Wages and Working Hours

All workers must receive wages and benefits that meet or exceed the legal minimum requirements in the country of operation.

- Overtime work must be voluntary, compensated fairly, and comply with local laws and international standards.
- We adhere to ILO Conventions No. 1 and 30 on Working Hours and use SA8000's framework for fair remuneration practices.

3. Safe and Healthy Working Conditions

We require that all workplaces provide safe, hygienic, and humane conditions.

- Employers must comply with all applicable occupational health and safety laws and ILO Convention No. 155.
- Workers must be provided with adequate training, protective equipment, and procedures to ensure their well-being.
- In alignment with SA8000, we evaluate health and safety risks and encourage worker participation in creating a safer work environment.

4. Non-Discrimination and Equal Opportunity

We prohibit discrimination in all employment practices, including hiring, promotion, compensation, and termination, on the basis of race, color, religion, gender, sexual orientation, age, national origin, or any other legally protected status.

- This commitment aligns with ILO Conventions No. 100 and 111 on Equal Remuneration and Discrimination in Employment, as well as SA8000's non-discrimination criteria.

5. Freedom of Association and Collective Bargaining

We respect the rights of workers to freely associate, organize, and engage in collective bargaining.

- This includes compliance with ILO Conventions No. 87 and 98 on Freedom of Association and the Right to Organize, and SA8000's guidance on worker representation.

6. Compliance with Local and International Standards

We require all suppliers and business partners to comply with:

- Local labor laws in the countries where they operate, including but not limited to:
 - China's Labor Law
 - Netherlands Labor Laws
- International labor standards, including the ILO Core Conventions, the UN Guiding Principles on Business and Human Rights, and the SA8000 framework for social accountability.

7. Monitoring and Accountability

To ensure compliance with these labor rights and standards:

- We conduct independent audits of our suppliers and partners.
- We require suppliers to report any violations or risks related to labor rights immediately.
- Corrective action plans will be implemented for any non-compliance, and relationships may be terminated for repeated or serious violations.
- We utilize SA8000's detailed audit methodologies and monitoring tools to assess adherence to these standards.

Environmental Responsibility Statement

We are committed to reducing our environmental impact, ensuring compliance with applicable regulations, and promoting sustainable practices throughout our operations and supply chain. Guided by the **ISO 14001** framework, we take a systematic approach to managing our environmental responsibilities.

1. Compliance with Environmental Regulations

We ensure that all our products meet the highest environmental standards, including but not limited to:

- RoHS (Restriction of Hazardous Substances Directive)
- REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals)
- Prop 65 (California Proposition 65)

To verify compliance, we use independent lab testing, ensuring our products meet or exceed the requirements of these regulations. This approach reflects our commitment to providing safe and sustainable products to our customers worldwide.

2. Legal Waste Management for EU Customers

As part of our service to our EU customers, we take on many of their legal waste obligations, simplifying compliance with waste management directives such as the WEEE Directive (Waste Electrical and Electronic Equipment) and Packaging and Packaging Waste Directive. By doing so, we aim to reduce the administrative burden on our customers while ensuring proper environmental stewardship.

3. Sustainable Practices and Accountability Sustainability is at the core of our operations. We strive to:

- Minimize waste and optimize resource use.
- Reduce emissions throughout our supply chain.
- Use eco-friendly materials in our products and packaging where feasible.

For a detailed outline of our specific sustainability goals and initiatives, we invite you to consult our Sustainability Report, which is available on our website or upon request.

4. Conflict Minerals Policy

- We require all suppliers of tin and other materials to certify that their products are free from conflict minerals sourced from high-risk regions.
- Suppliers must comply with:
 - EU Conflict Minerals Regulation
 - U.S. Dodd-Frank Act (Section 1502)

5. Monitoring and Continuous Improvement

We continuously monitor our environmental impact and seek innovative ways to improve. By following the ISO 14001 framework, we implement best practices for environmental management, regularly review our performance, and set measurable goals to enhance our sustainability efforts.

Health and Safety Statement

We are committed to providing safe and healthy working conditions and ensuring that our operations meet or exceed all applicable health and safety regulations.

1. Health and Safety for Our Employees

For our employees, we adhere to Dutch health and safety regulations, as outlined in the Arbeidsomstandighedenwet (Working Conditions Act).

- We conduct regular Risk Inventory and Evaluation (RI&E) assessments to identify workplace hazards and implement measures to mitigate risks.
- Our commitment includes ongoing training, adequate safety equipment, and robust emergency response protocols to ensure a safe and compliant workplace.

2. Health and Safety Standards for Suppliers

We require all our suppliers and partners to comply with their local health and safety regulations and to provide safe, hygienic, and appropriate working conditions for their employees. These standards must align with applicable national laws and international best practices for occupational health and safety.

3. Independent Audits

To ensure adherence to health and safety requirements:

- We conduct independent audits of our suppliers' facilities to verify compliance with local regulations and best practices.
- Suppliers are expected to cooperate fully with audits and implement corrective actions promptly for any identified non-compliance.

4. Commitment to Continuous Improvement

We believe that health and safety are not static responsibilities but ongoing commitments. We continually review and improve our health and safety policies to reflect new risks, regulatory updates, and technological advancements.

Data Protection and Privacy Statement

We are committed to safeguarding the privacy and personal data of our employees, customers, suppliers, and partners. We recognize the importance of protecting personal information and comply with all applicable data protection and privacy laws in the regions where we operate.

1. Compliance with Data Protection Laws

We ensure adherence to global and regional data protection regulations, including compliance with Dutch and European Data Protection Laws. We comply with the General Data Protection Regulation (GDPR) and the Dutch Implementation Act for the GDPR (UAVG), ensuring the highest standards of data protection for all personal data processed in the Netherlands. In addition, we adhere to the Telecommunications Act (Telecommunicatiewet) regarding the use of cookies and tracking technologies and comply with privacy-related provisions in the Dutch Civil Code (Burgerlijk Wetboek) where applicable.

2. Personal Data Handling Practices

We follow strict protocols to ensure that personal data is collected, processed, stored, and shared responsibly:

- Data is collected for specific, lawful purposes and is processed transparently.
- Access to personal data is restricted to authorized personnel who require it to fulfil their job responsibilities.
- Personal data is securely stored and protected from unauthorized access, loss, or misuse.

3. Rights of Individuals

We respect the rights of individuals under applicable data protection laws, including:

- The right to access their personal data.
- The right to request correction or deletion of their data.
- The right to restrict or object to certain processing activities.
- The right to data portability, where applicable.

4. Security Measures

To ensure the integrity and security of personal data, we employ:

- Encryption and secure communication protocols.
- Regular data protection audits and risk assessments.
- Robust incident response procedures to address potential data breaches swiftly.

5. Supplier and Partner Compliance

We require all suppliers and partners who process personal data on our behalf to comply with the same data protection standards.

- Suppliers must adhere to binding data protection agreements.
- Independent audits may be conducted to verify compliance.

6. Transparency and Accountability

We are committed to full transparency in our data handling practices and ensure that all stakeholders are aware of how their data is used and protected. Regular training is provided to employees to uphold our data protection policies.

7. Reporting and Inquiries

Individuals who have questions or concerns about our data protection practices can contact us at Info@bits4tours.com. Any data breach incidents will be reported to the appropriate authorities as required by applicable laws.

Whistleblower Protection and Reporting

We are committed to fostering a culture of transparency, accountability, and ethical behavior. To support this, we provide a secure and confidential mechanism for reporting any suspected violations of our **Code of Conduct and Compliance Statement**, including issues related to bribery, corruption, labor rights, environmental practices, data protection, or other unethical behavior.

1. Whistleblower Protection

We encourage all employees, suppliers, and partners to report any misconduct or concerns without fear of retaliation.

- Reports can be made confidentially and, where necessary, anonymously.
- Whistleblowers will be protected under applicable laws, including the **EU Whistleblower Protection Directive (2019/1937)** and relevant national laws.
- Retaliation or discriminatory action against whistleblowers who report in good faith is strictly prohibited.

2. Reporting Channel

Reports can be submitted confidentially to the following email address, which is accessible only by the owner of the company:

- **Email Address:** Jade@bits4tours.com

3. Investigation Process

- Upon receiving a report, a thorough and impartial investigation will be conducted.
- Where necessary, sensitive reports may be escalated to an independent third party to ensure impartiality.
- Findings will be documented, and corrective actions will be implemented where required.

4. Confidentiality Assurance

All reports will be handled with strict confidentiality. Whistleblowers' identities will not be disclosed without their consent unless legally required.

Consequences of Non-Compliance

Failure to comply with the principles outlined in this **Code of Conduct and Compliance Statement** will result in appropriate corrective actions. Consequences may include, but are not limited to:

- **For Employees:**
 - Disciplinary actions, up to and including termination of employment.
- **For Suppliers and Partners:**
 - Termination of contracts or partnerships.
 - Legal action for breaches of contract or applicable laws.
- **For the Company:**
 - Immediate remediation to address violations within our own operations.
 - Full cooperation with legal authorities, including reporting violations where required.

Contact Information

If you have any questions about this **Code of Conduct and Compliance Statement**, or if you need further clarification, please feel free to contact us:

- **Email Address:** info@bits4tours.com
- **Phone Number:** +31 481 454664
- **Mailing Address:** P.O Box 123, 6680 AC Bommel, The Netherlands

For confidential reports or whistleblower submissions, please use our dedicated email: [**jade@bits4tours.com**](mailto:jade@bits4tours.com)

We are committed to addressing all inquiries and concerns promptly and professionally.

Our commitment to ethical conduct and compliance is non-negotiable. By adhering to these principles, we aim to build trust and ensure the long-term success of our business relationships.

As the Director and Owner of MSupport International BV, I, Jade Deuschle, hereby certify that this document is accurate and reflects the principles upheld by our organization.