

RESPONSIBLE PURCHASING POLICY

E-10 Rev 1.1

Divergent is committed to doing the right thing, always. We believe we must act in a socially responsible manner in all countries in which we operate, and similarly expect our Sellers to act in a similar manner. This purchasing policy therefore describes the standards of actions, policies, and practices that we require as a condition of being able to supply for Divergent. The world requires more than just adherence to local laws, it requires our supply chain, together with us, to support and implement responsible business operations and practices.

As a condition of working with us, we expect our Sellers and sub-suppliers of Divergent's extended supply chain to promote, communicate, and adhere to the principles outlined in this purchasing policy. Our motivation is partly driven by the fact that the world is finite and that environmental issues affect us all. We also strongly believe in human dignity, and that issues such as modern slavery, human trafficking, and child labor should have no safe harbor in the current world.

Our policies broadly span three main areas: social principles, environmental protection and conservation, and ethical behavior. We hold ourselves to these principles and also expect all of our Sellers, and sub-suppliers to act according to a similar code of conduct and to uphold the principles as laid out below.

Social Principles

1. Human Rights

We respect all internationally proclaimed human rights in all the countries in which we operate. We actively prevent acts that might violate human rights and actively avoid activities which we may be complicit in violations of human rights.

2. Child Labor

We do not use child labor. We do not employ any person below the age of 15.

3. Forced Labor

We do not use forced labor, which includes: physically abusive disciplinary practices, wages below the legal mandatory minimum in the local jurisdiction, or any other form of forced labor.

4. Freedom of Association and Collective Bargaining

We believe in the rights of workers to form and join labor unions, and join collective bargaining agreements.

We respect and will work with union representatives to best promote the wellbeing of our employees.

5. Discrimination

We are an equal opportunity employer. We do not make any employment decisions based on race, ethnic origin, gender, maternity, marriage and civil partnership, pregnancy, age, religion, political opinion, trade union activity, disability, age, and sexual orientation.

6. Health and Safety

We will maintain and enforce a safe and healthy environment for our employees while they work.

Environmental Responsibility

1. Environmental Quality Management

We implement a policy of management and continual improvement for the protection of the environment and reduction of energy consumption, material use, material waste, water use, hazardous waste, and other emissions and outputs that impact the environment. We expect every Seller to either be ISO 14001 certified, or meet an equivalent standard, or to demonstrate that it is taking steps to do so.

2. Environmental Operational Performance

We will meet or exceed the environmental regulations on environmental impacts of our own facilities.

3. Environmental Product Performance

All of our products will comply with all applicable environmental and governmental legislation, especially with regards to recyclability, recoverability, reusability, end-of-life-vehicle-directive. Moreover, we expect our Sellers to work with us to identify areas in which we can continually improve the recyclability or up cyclability, and where possible to utilize materials which can enter into a closed-loop process.

Ethical Responsibility

1. Prohibited Substances and Materials

We respect all legislations concerning all restricted and banned substances or materials, especially if those substances have harmful impacts on human health or the environment.

2. Conflict Materials

We will always source materials or supplies in a legal manner and will be avoid sourcing responsibly from conflict zones. We expect our Sellers to actively monitor whether or not they are sourcing responsibly.

3. Corruption and Bribery

We have a zero-tolerance approach to all forms of bribery and corruption. We will act fairly, professionally, and with integrity in all of our operations wherever we operate.

4. Personal Data

We abide by all applicable laws concerning the collection and use of personal data.

Additional Seller Responsibilities

Promotion of Policies in the Supply Chain

We expect each of our Sellers to promote the policies noted above to all their Sellers, such that the entire supply chain will abide by the principles, codes of conduct, and actions outlined. Our Sellers acknowledge that they understand these requirements and agree to make reasonable efforts to support these initiatives. We therefore also require our Sellers to communicate these principles to their suppliers and comply with all relevant laws in these areas.