



ARGO360 Code of Conduct

FOREWORD

At ARGO360, we believe in doing business in an honest and sustainable way. We believe that by collecting products that are no longer relevant for use should be recycled. To guarantee this, we pay the approved collector(s) less for a product than the second-hand market price in the area where the product is collected. ARGO360 does not compete with existing mandatory or regulated take-back systems in the region that are functional and have the capacity to handle the products to be collected by the approved collector(s). This Code of Conduct promotes the management system of ARGO360, regulates the distribution network and interactions with each stakeholder participating in this network, by evaluating, informing, improving and developing this distribution network. This Code of Conduct with concepts and guidelines is shared with all stakeholders, own employees and suppliers involved in all transactions in the distribution network.

FUNDAMENTALS

ARGO360 used the RBA Code of Conduct and ILO rules/regulations as a guide in preparing this document. (Source: <http://www.responsiblebusiness.org/code-of-conduct/>, [ilo.org](http://www.ilo.org))

ARGO360 generally operates according to the following principles:

ARGO360 and its suppliers and distributors fully comply with all applicable laws, rules and regulations in the countries where they operate;

- Partners in the supply chain with which ARGO360 are directly connected and must agree to comply with these standards. In addition to the information contained in this code, the code is based on the UN.
- Guiding Principles on Business and Human Rights.

ARGO360 remains committed to reducing supply chain risks while striving for Improvement.

APPLICABILITY AND SCOPE

This Code of Conduct applies to all employees of ARGO360 and to all first and second tier supply chain participants. These are classified as local service providers (1st level) and their direct agents (2nd level). Recyclers in the distribution network must also comply with this directive and are contractually obliged to do so. In addition further down the supply chain and other stakeholders to whom the code applies can be expected to comply with the code to the best of their ability.

STRUCTURE & GRIEF MANAGEMENT

It is the ultimate responsibility of the Supply Chain Manager (SCM), to implement the supply chain system and adhere to this Code of Conduct. As part of this role, the SCM implements changes to strengthen implementation based on the Code of Conduct. Anyone who feels aggrieved by a problem in the supply chain can file complaint(s) within the supply chain. If the problem cannot be dealt with through the supply chain, the complaint must be sent directly to the company's complaints officer. The Complaints Officer will contact the individual directly and, if necessary, take mitigating action. Management shall document to ensure compliance.

MANAGEMENT RISK ASSESSMENT

ARGO360 uses the Customer Due Diligence process (CDD) to identify any issue within its supply chain that relates to legal, environmental, health and safety, employment or ethical compliance. If an issue is discovered, the impact of the issue and alternatives to mitigate the risks are further investigated by ARGO360. This is usually done in consultation with the client. If problems are deemed unacceptable for cooperation with this counterparty according to this code, the relationship will be dissolved before the matter is settled.

INSPECTIONS AND EVALUATIONS

ARGO360 reviews and complies with this Code of Conduct every year through internal discussions, interviews, feedback forms and documentation checks by the parties involved in this Code of Conduct. ARGO360 can also regularly request a third-party evaluation. All stakeholders also have the right to request a third-party audit of the distribution network at their own expense.

PROBLEM IDENTIFICATION

The issues associated with the distribution network are recognized in a variety of ways and documented in our evaluation documents. Problems can also be identified via customers or partners (see our whistleblower policy).

SOFTENING PROCEDURE

The SCM and the CEO of the company should be continuously informed of problems within the supply chain. It is the responsibility of the SCM, in collaboration and consultation with the relevant stakeholders, to address problems and then develop a method to correct problems. Supply chain issues will always be addressed in coordination with the local country service provider. Additional risk mitigation strategies include monitoring of progress targets, policy training for partners and review of COC awareness.

CUSTOMER DUE DILIGENCE

SUPPLIERS

ARGO360 applies the CDD principle with respect to stakeholders and customers in the supply chain. ARGO360 has written contracts and demonstrates that its first-tier suppliers have been identified. Contracts between these suppliers and local service providers are also required for second tier suppliers. Since ARGO360 deals extensively with the informal sector, it is not always feasible to have proof of identity, even if efforts are made to do so. A verbal agreement and a printed version is signed by the local service provider for secondary suppliers who are not literate. All contractors are provided with this code of conduct and are contractually required to abide by it. This also applies for second tier suppliers. Collection must take place with local companies to ensure a systematic investment in capacity in the regions where collection takes place.

CUSTOMERS

In order to establish its identity and its ability to participate in the contractual obligations entered with the Company, ARGO360 obtains from its clients all legally required information. ARGO360 fully complies with the requirements of the Wwft European Directive and legislation to prevent money laundering and the financing of terrorism.

RECYCLERS

ARGO360 maintains contractual relationships with all operational recyclers. This Code of Conduct includes this contractual relationship and any agreements. As for the certification and compliance of the recyclers/refiners, ARGO360 performs this itself. Although useful, ARGO360 does not require certification as ARGO360 also works with smaller smelters. This does not alter the fact that compliance with local legislation is demanded by ARGO360. ARGO360 promotes and supports certification (such as WEEELABEX CERTIFIED) whenever possible in all relationships with refineries, by providing essential registration information, as well as expertise and certification. ARGO360 discloses the identity of all refineries participating in its operations to the extent permitted by the contracts.

COMPLIANT TO (LOCAL) LAW

ARGO360 requires all participants in its supply chain to comply with local laws and regulations. Contractual partnerships with ARGO360 are responsible for compliance with all local laws and regulations and for providing ARGO360 with a statement of its legal and regulatory status. The validity of all licenses and the statement of legal status must be annually checked. This is a standard obligation that ARGO360 has to fulfil to maintain the WEEELABEX certification. All applicable local and national health and safety and labor laws effective in the country of manufacture and a 60 hour working week, including overtime. Will be maintained and uphold.

DEVELOPMENT OF DISTRIBUTION

ARGO360 strives to continuously improve all processes and actors in its distribution network. As a social enterprise with an impact mission, this is directly linked to the mission of the company and therefore integrated in the work that ARGO360 performs. We obtained our PSO 3|30+ certification, this because we help people with a distance to the labor market. We provide them with jobs and/or training, so that they can (re)start their careers.

DEVELOPMENT GOALS

ARGO360 develops annual objectives, particularly with respect to the impact of its activities. All employees are aware of these objectives and first-tier suppliers are informed of these objectives.

CONTACT & DOCUMENTATION

All contracts and procedures are correctly and securely documented. All parties involved in the transaction are informed and these processes are shared with stakeholders throughout the distribution network. ARGO360 CLOUD is a CRM/ERP system used by ARGO360 and its suppliers in which all contracts and transactions are recorded. This includes data about consignments received as well as deliveries for further treatment to support the sustainability aspects and traceability of the items received by, being processes at and leaving ARGO360.

THE STANDARDS

As a basis for its own code of conduct, ARGO360 has used the RBA code of conduct as a guideline and supplemented it with all the obligations, necessities and requirements of our certifications including ISO9001, ISO14001, ISO27001, WEEELABEX, PSO 3 | 30+. This code of conduct is shared with all parties involved with ARGO360. The ISO 59014 (clause 7.3) was also used as reference.

HYGIENE

ARGO360 requests that the participants in the supply chain (contracted to the second tier suppliers) be provided with safety tools for the collection of electronic waste, its processing and storage. This includes gloves for most of the operations and face masks for workers whom sort the collected electronic waste. There are no formal specifications available for the equipment as this is an optional action by ARGO360. ARGO360 provide the safety equipment (Personal protective equipment) to ensure the proper use of gloves and face masks.

EMPLOYMENT

ARGO360 regards its supply chain employees as anyone who is compensated for a service in its supply chain.

CHILD LABOUR¹

Children under the age of 15 throughout the supply chain are not eligible to work for ARGO360. The RBA defines a minor as "The term child refers to "Any person who is under 15 years of age, or under the age at which compulsory education ends, or under the minimum age for employment in the country the child is concerned "Young workers (15-18 years old) are allowed by ILO Convention No. 182 to perform light work only under the supervision of

¹ ISO 59014 (<https://www.iso.org/obp/ui/en/#iso:std:iso:59014:ed-1:v1:en>)

3.1

child labour

work that deprives children of their childhood, their opportunity to attend school, their potential and their dignity, and that is mentally, physically, socially or morally dangerous and harmful to children

Note 1 to entry: Child labour interferes with their schooling by:

- — depriving them of the opportunity to attend school;
- — obliging them to leave school prematurely; or
- — requiring them to attempt to combine school attendance with excessively long hours and heavy duties.

Note 2 to entry: In its most extreme forms, child labour involves children being enslaved, separated from their families, exposed to serious [hazards \(3.8\)](#) and illnesses and/or left to fend for themselves on the streets of large cities, often at a very early age.

Note 3 to entry: Children's participation in work that contributes to their development and the welfare of their families can be considered as positive if this provides them with skills and experience, helps to prepare them to be productive members of society during their adult life and does not affect their health and personal development or interfere with their schooling. These activities include helping their parents around the home, assisting in a family business or earning pocket money outside school hours and during school holidays.

Note 4 to entry: Derived from the International Labour Organization "What is child labour?"^[16].

an adult, who will restrict overtime or hazardous work. ARGO360 also adheres to the ILO's eight core conventions: 29, 87, 98, 100, 105, 111, 138 and 182. This also includes UN Convention on the Rights of the Child, Article 32. Although RBA specifies production steps, every part of the supply chain for ARGO360 is considered under this code. In ARGO360's Child labor policy regarding child labor, we strive for child labour free processes in the supply chain. ARGO360 promotes respect for human rights throughout the organization and in its business values, therefore the policy is integrated throughout the company. In our Child labor policy we describe in depth how we dealt with young/child workers.

Epilogue

We have therefore used the [ILO](#) and RBA code as a guideline, because RBA focuses on the electronics sector and is most related to our business. ARGO360 has chosen to follow the same principles, supplemented with ISO59014, ISO9001, ISO14001, ISO27001, WEEELABEX, PSO 3|30+ and the relevant industry-related laws and regulations.