



Supplier Code of Conduct

Version Control

Date	Version	Updated By	Approved By	Description of Change
05-08-2021	1.0	Compliance Custodian	VP Operations, Legal Counsel	First policy's consolidated version
12-01-2022	2.0	Compliance Custodian	VP Operations, Legal Counsel	Updates, additions & corrections

Policy statement, objectives and scope

Surecomp strives to establish and maintain long term, mutually beneficial and fair relationships with its suppliers. As responsible business partner (s) and representatives of Surecomp, Surecomp expects its suppliers to exercise competence, dedication, an agile approach in all professional areas, to comply with the Surecomp Code of Conduct and align with Surecomp customer Codes of Conduct as needed.

Surecomp strives to select suppliers that share our commitment to professional excellence, social responsibility, and sustainable business practices.

By agreeing to work with Surecomp, each supplier confirms that it and its affiliates comply with this Supplier Code of Conduct and that its own suppliers, subcontractors, consultants, and partners will also comply with the principles of this Code of Conduct, also referred to herein as the Code.

This Code:

1. Provides guidelines and general principals on how we expect our suppliers to behave with regards to social, ethical, and environmental business practices and does not necessarily include precise detailed rules for all possible scenarios encountered. Surecomp's suppliers are expected to act in good faith and consult with Surecomp management as needed.
2. Includes a set of minimal standards of conduct to be followed by all supplier(s) and is not to be considered a substitute for, nor to override relevant applicable laws and regulations. If the supplier is unable to comply with the Code and/or applicable laws and regulations, the supplier shall, to the extent reasonably possible, adhere to the spirit of the Code.
3. Suppliers are expected to establish environmental, social and governance management systems that reflect the nature and scope of their risks and opportunities.



Guidelines & supplier obligations

1. Legal Compliance & Personal Data Privacy

Surecomp suppliers must comply with all applicable laws and regulations.

Surecomp and its suppliers are committed to (a) handling all information concerning Surecomp, its clients, personnel, and others effectively and (b) to protect security and confidentiality.

Surecomp suppliers must:

- a. Respect individual rights to privacy.
- b. Adhere to applicable laws on the use of personal data.
- c. Ensure confidential, sensitive and/or personal information/data is accessible only to authorized users, obtained on a need-to-know basis, is securely protected and disposed of when no longer needed.
- d. Act responsibly when accessing Surecomp IT assets and communication systems.
- e. Ensure personal data is only obtained by lawful means and, where required, with the knowledge and consent of the stakeholder.

2. Business Conduct

Surecomp suppliers must:

- a. Be committed to high ethical standards in all its operations and business practices.
- b. Prohibit any corrupt, fraudulent practices and money laundering activities.
- c. Have no tolerance towards bribery and corruption and not engage in any form of bribery, kickback schemes or otherwise offer any inappropriate incentive(s).
- d. Ensure its personnel and/or any of its sub-contractors acting on its behalf do not offer, promise, give or accept bribes, make, or accept improper payment to obtain new or retain existing business, or secure any other improper advantage.
- e. Offer only modest business courtesies as compliant with applicable laws and limited in scope, value, and frequency.
- f. Avoid any interaction with personnel, clients and other suppliers that may conflict or appear to conflict with the duty to act in the best interests of Surecomp, and in accordance with Surecomp corporate policies.
- g. Compete in a fair manner and in compliance with all applicable competition laws and regulations, e.g. not enter into any agreements with Surecomp competitors to increase prices or restrict product or service availability.
- h. Comply with all applicable import and export control laws and regulations, including but not limited to international trade sanctions issued by the UN EU and/or US authorities.
- i. Notify Surecomp immediately if the supplier itself or anyone linked to the provision of its products and/or services becomes subject to any type of sanctions, restrictions,



compliance investigation, or if the supplier becomes aware that any of the products, software or technology it supplies to Surecomp is subject to any import or export controls or license requirements.

3. Labor & Human Rights

Surecomp suppliers must:

- a. Respect internationally recognized human rights, including those set out in the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- b. Treat its personnel in a fair and equal manner; not discriminate in hiring, compensation, promotion, discipline, termination or retirement of personnel based on gender, gender identity, age, religion, marital status, sexual orientation, disability, social class, political opinion, or national or ethnic origin, or any other characteristic that does not relate to the individual's professional and personal qualifications as required for and inherent in the job.
- c. Not use workers under the applicable legal working age. No young worker shall do work that is mentally, physically, socially or morally dangerous or harmful or interferes with formal education or in any way deprive of the opportunity to attend school.
- d. Under no circumstances apply:
 - i. Forced labor or contract others using child or forced labor.
 - ii. Mental, physical coercion, slavery, human trafficking of any form.
- e. Treat its personnel with dignity and respect, and make sure no member of its workforce experiences any physical, sexual, psychological or verbal harassment, abuse or other form of intimidation.
- f. Ensure due, fair and lawful compensation is made to its personnel (including contractors, temporary or part-time personnel).
- g. Complies with all applicable wage laws, including those relating to minimum wages, overtime hours, paid leave and mandatory benefits.
- h. Make sure all personnel is provided with freely agreed employment documents that respect legal and contractual rights.
- i. Respect rights to freely associate and bargain collectively in compliance with applicable laws and regulations
- j. Refrain from intimidation or harassment in the exercise of legal rights to join or refrain from joining any organization.
- k. Provide personnel with the means to raise concerns related to requirements outlined in this Code, and anyone raising such a concern in good faith shall be protected from retaliation or any form.
- l. Promote, support and respect community rights, such as access to land, land usage rights and the right to a safe environment, in all its operations.
- m. Assess, anticipate and avoid negative impacts on local communities within which it operates to the extent possible.



4. Health, Safety & Environment

Surecomp suppliers must:

- a. Ensure its personnel have a safe and healthy working environment in compliance with all applicable laws and regulations.
- b. Provide appropriate health and safety information, training and equipment.
- c. Have effective safety programs in place covering at least human safety, emergency preparedness and exposure to dangerous chemicals, addictive or detrimental biological substances, epidemics and pandemics.
- d. Make all reasonable efforts to protect the environment and minimize any negative impact of its activities on the environment.
- e. Comply with all applicable environmental laws and regulations.
- f. Obtain, maintain and comply with all environmental permits, licenses and registrations necessary and applicable for its operations, including but not limited to appropriate treatment of relevant pollutants, reduction of the carbon footprint of its operations e.g. improving energy efficiency, sourcing renewable energy and eliminating, reducing and recycling waste.

5. IPR, Publicity, Monitoring, & Reporting

Surecomp suppliers must:

- a. Comply with all applicable laws and international treaties on intellectual property rights. The supplier shall not infringe Surecomp or any third party's intellectual property rights.
- b. Refrain from publicizing its cooperation with Surecomp or utilizing Surecomp trademarks without the explicit and prior written consent from Surecomp.
- c. Regularly monitor its compliance with this Code.
- d. Provide Surecomp all relevant information and documents needed to verify the supplier's compliance with this Code upon request and support Surecomp or relevant third-party auditors to survey relevant premises in the event there is reason to believe the supplier may be in breach of the Code.

In the event of breach, Surecomp can issue a notification of immediate termination to the business relationship with the supplier.

The supplier can send any notifications in connection with this Code (such as queries) to legal@surecomp.com.