



eunetworks.

# Supplier Code of Conduct

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## 1. Purpose

euNetworks Group Holdings Limited (together with its holding companies and subsidiaries “euNetworks” or “Company” or “us” or “we”) is committed to making a positive impact on society and the world. We have formulated various policies, procedures and practices in our operations and strategy that include ethical business practices, regulatory compliance and a commitment to sustainability.

We in turn expect our Suppliers to commit to this Supplier Code of Conduct and the principles stated within our Sustainability Policy to play their part in building a fair and sustainable global economy.

## 2. Scope

euNetworks expects all Suppliers, consultants, contractors, manufacturers and other business partners in their supply chain, as well as their respective employees, agents, and representatives (collectively “Suppliers” or “you”) with whom we do business to embrace and share our commitments to integrity, sustainability and to operating business responsibly. While we recognise the different legal and cultural environments in which our Suppliers operate throughout the world, we expect our Suppliers to follow the principles set out in this Supplier Code of Conduct and to take steps to ensure compliance with all relevant laws, regulations and standards in all of the countries in which they operate.

This Supplier Code of Conduct applies to all Suppliers. Nothing in this Code supersedes any more specific provision in a particular contract, and to the extent there is any inconsistency between this Supplier Code of Conduct and any applicable contractual provision, the contractual provision will prevail unless inconsistent with applicable law.

## 3. The Policy

This document sets out fundamental standards concerning environmental practices, employment conditions and general ethical business practices to which Suppliers agree if they wish to do business with euNetworks.

All euNetworks Suppliers must conduct their business activities in full compliance with all applicable laws. We expect our Suppliers to have internal policies and procedures in place that address the following areas, although we recognise that some of these (e.g. greenhouse gas emissions data) will be less achievable for certain Suppliers whether due to the areas in which they operate or their size.

### 3.1 Environmental Protection and Compliance

euNetworks recognises its social responsibility to protect and regenerate the environment. We expect Suppliers to share our commitment by responding to challenges posed by climate change and working toward protecting and regenerating the environment. As a part of this commitment, all euNetworks Suppliers agree to:

- Comply with all applicable environmental laws and regulations, including but not limited to laws and regulations that regulate the
  - air, soil and water emissions and wastes,
  - management and disposal of hazardous materials,
  - the protection of natural resources, wildlife and wetlands, and
  - recycling and other laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in manufacturing or product design.
- Obtain and maintain all required environmental permits, regulatory approvals, and registrations.
- If requested by euNetworks, disclose complete, consistent, and accurate scope 1, 2 and 3 greenhouse gas (GHG) emissions data and/or components required to calculate GHG emissions data. Additionally, Suppliers may be asked to provide plans to reduce GHG emissions in alignment with euNetworks’ requirements.

- Take steps to reduce their GHG emissions, preferably to achieve Science Based Target in line with the Paris Agreement goals and with a view to achieving Net Zero by 2050 or earlier.
- Prevent or eliminate waste of all types, including water discharges and energy losses, by implementing appropriate conservation measures in Suppliers' facilities through (1) the use of conservation-minded maintenance and production processes, and (2) by implementing circular economy strategies to reduce, reuse, and recycle materials (in that order), whenever possible, prior to disposal.
- Commit and support creating eco-friendly products by integrating the concepts of Circular Economy (i.e. reduce, reuse and recycling in material consumption, design, quality, packaging and disposal).
- Identify any chemicals, waste, or other materials that may be released, and which may pose a threat to the environment, and manage such chemicals or materials appropriately to ensure their safe handling, movement, storage, use, reuse, recycling, and disposal.

### 3.2 Fair Labour Practices and Human Rights

**Compliance of Human Rights:** Suppliers agree to share euNetworks' commitment to:

- **Respect all human rights:** Suppliers shall without limitation (1) comply fully with all employment laws in the respective countries, (2) share euNetworks' commitment to respect all human rights and to provide equal opportunity in the workplace, and (3) take effective measures to remedy human rights abuse of any kind and fair labour violations, including the disclosure of any and all potential violations, and (4) cooperate fully in investigations into such happened or alleged violations.
- **Prohibit child labour:** Child labour must not be used under any circumstance. Suppliers must not employ anyone under the age for completing compulsory education, or under the legal minimum working age for employment set by local law, whichever requirement is most restrictive.
- **Prohibit forced/bonded labour and human trafficking:** All Suppliers, including recruiters, employment agencies, sub-agencies, and recruitment firms, are prohibited from using forced labour and trafficking in persons, and the procurement of commercial sex acts. All forms of forced labour are prohibited.
- **Ensure workers have access to identity and personal documents:** Suppliers, agents, and sub-agents are prohibited from requiring workers to lodge "deposits", withholding employee identity or immigration papers, or destroying, concealing, confiscating, or otherwise restricting or denying workers' access to such documents. Workers must be free to resign their employment in accordance with local and national laws or regulations without unlawful penalty.
- **Access to Clean water:** Suppliers must provide access to clean drinking water for all employees' health and personal needs and ensure that only potable water is used for these purposes.
- **Modern Day Slavery:** Suppliers must identify and eliminate any slavery in their business and supply chains, and act ethically and with integrity in all their business relationships.

**Compliance of Employment Laws and Regulations:** Suppliers will:

- **Make conditions of employment clear when hiring:** Suppliers must prohibit the use of misleading or fraudulent practices during the recruitment or employment process. Suppliers must before employment disclose basic information regarding the key terms and conditions of employment, including wages and other benefits, location of work, living conditions and any hazards involved in the work. All contracts must (1) clearly convey the conditions of employment in a language understood by the worker, and (2) reflect applicable laws and regulations.
- **Provide fair and competitive compensation.** Suppliers must provide fair compensation for all employees and workers, including employees who are permanent, temporary, or

dispatched, migrant workers, apprentices, and contract workers. Such compensation must meet the legal minimum standards as required by local law.

- **Treat employees with dignity and respect:** Suppliers must not engage in any harsh or inhumane treatment, including any form of violence, gender-based violence, sexual or other harassment including psychological harassments or threats, sexual abuse, corporal punishment, mental or physical coercion, bullying, or public shaming. Verbal abuse or other forms of intimidation are prohibited.
- **Working hours requirements:** Suppliers are prohibited from requiring workers to work more than the maximum hours as set by local law. Suppliers must ensure overtime is voluntary and paid in accordance with local and national laws or regulations.
- **Freedom of association and right to collective bargaining:** Suppliers must respect workers' rights to freedom of association, collective bargaining, and peaceful assembly in accordance with local legal requirements.
- **Training and Development:** Suppliers must invest in performance appraisal of employees by conducting regular training and development sessions and encouraging them to grow within the organisation.
- **Use appropriately trained recruiters:** Where appropriate, Suppliers must use recruiters, employment agencies, and recruiting companies that are trained and which comply with international standards, local labour laws of the countries in which the recruitment takes place.

**Non-discrimination (Diversity, Equality & Inclusion):** Our business culture and company policies promote mutual respect, acceptance, and cooperation. We are committed to fostering a diverse and inclusive work environment, and we recognise that our employees' varying backgrounds and cultures are among our greatest assets. Suppliers must commit to a workforce and workplace free of harassment and unlawful discrimination in employment on the basis of age, ancestry, citizenship, colour, family or medical care leave, gender identity or expression, genetic information, immigration status, marital or family status, medical condition, national origin, physical or mental disability, political affiliation, union membership, race, religion, sex (including pregnancy), sexual orientation and any other characteristic protected by applicable local laws, regulations, and ordinances.

Our Suppliers agree to support all forms of legal youth employment, including the development of legitimate workplace apprenticeship programs for the educational benefit of young people.

**Health & Safety:** euNetworks Suppliers are required to develop and implement health and safety management practices in all aspects of their business, in accordance with international standards and national laws. Suppliers must agree to:

- Provide a safe and healthy work environment for all employees, act to minimise the causes of hazards inherent in the working environment, and implement controls.
- Establish an occupational health and safety management system and encourage employee participation to set policy, roles, responsibilities, and accountabilities, provides for risk and hazard identification and assessment, and provides appropriate communication channels for employee access to health and safety information.
- Comply and implement a process to ensure that their employees comply with all applicable occupational health and safety laws and regulations, including but not limited to requirements that address occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing.
- Prohibit the use, possession, distribution, or sale of illegal drugs.
- Commit to build a healthy workplace culture to enhance all employees' mental health and wellbeing.

### 3.3 Business Practices and Ethics

Our Suppliers must:

**Antitrust:** Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.

**Anti-Corruption:** Conduct business in full compliance with the Foreign Corrupt Practices Act (“FCPA”) and the U.K. Bribery Act, anti-corruption and anti-money laundering laws that govern the jurisdictions in which Suppliers conduct business. This means that our Suppliers must not accept bribes or any improper payments from any contractors, subcontractors, or other Suppliers you recommend to us or manage on our behalf or offer bribes, give gifts of any significance or any improper payments with a view to securing business for us or with us.

**Political Contributions:** Limit financial donations and grants of any monetary benefits to any political party to the limits permitted by law.

**Gifts and Entertainment:** Use good judgement when exchanging business courtesies. Gifts, meals, entertainment, hospitality, and trips that are lavish or lack transparency or legitimate purpose may be viewed as bribes, may create the appearance of a conflict of interest, or may be perceived as an attempt to improperly influence decision making. Never give anything to gain an improper business advantage.

**Conflicts of Interest:** Be honest, direct, and truthful when answering questions from euNetworks about relationships with euNetworks employees, directors or investors. Avoid improprieties and conflicts of interest or the appearance of either. Suppliers shall comply with all applicable competition laws (including but not limited to the Competition Act 1998).

**Community Relations:** Commit to establishing and maintaining the highest standards of corporate social responsibility in your business activities, being a good corporate citizen and contributing to the well-being of local communities. You must encourage and support your employees to volunteer and participate in periodic community activities and initiatives with strategic partners.

**Effective Grievance Procedures:** Provide employees with effective grievance procedures for raising workplace concerns, including concerns involving harassment and discrimination, to the attention of management for appropriate resolution. Workers must be given a safe environment to provide their grievances and feedback.

**Ethical Sourcing:** Have ethical and responsible sourcing practices in place and source only from companies that satisfy the requirements of this Supplier Code of Conduct. Also, Suppliers shall be aware of all sites and companies involved in their production and supply chain, and upon request should be able to provide euNetworks with adequate details of the supply chain for the goods supplied to euNetworks.

**Integrity:** Promote an open and honest workplace in which you mutually respect each other and treat each other equally. Suppliers must encourage employees to come forward if misconduct occurs either through our Whistle Blowing policy or via any other grievance mechanism.

**Promote Digital Payments:** Promote and use digital payment solutions for receiving and making payments. i.e. bank accounts and /or mobile money.

**Press & Publicity:** Only speak to the press on behalf of euNetworks or issue press releases or other publicity related to relationship or contracts with euNetworks, with the prior written consent of euNetworks.

**Systematic Risk Management:** Have a robust Risk Management System. We expect our Suppliers to assess Environmental, Social and Governance (ESG) risks/non-financial risks and set effective processes and internal controls to monitor and minimise the same.

### 3.4 Legal and Regulatory Practices

Our Suppliers must:

**Accuracy of Business records:** Record and maintain information and documentation honestly and accurately. All financial records and accounts related to euNetworks’ business reflecting transactions, payments and events must conform to generally accepted accounting principles, internal controls,

policies and applicable laws. When asked, provide euNetworks' with accurate and complete billing information concerning all our transactions.

**Business Information Reporting:** Conduct all business reporting activities honestly and accurately and comply with all applicable laws regarding their completion and accuracy.

**Communication:** Be honest, direct, and truthful in discussions, including those with regulatory agency representatives and government officials.

**Trade:** Comply with all international laws, national laws, regulations, and other controls, which govern the transfer, access, export, re-export, and import of products, services, and technology. Suppliers must maintain, where applicable, robust compliance programs and policies to manage technologies, products, and technical data that is controlled or restricted by law.

**Embargoes and Sanctions:** Comply fully with international economic sanctions and embargoes restricting persons, corporations and foreign subsidiaries from doing business with certain countries, groups and individuals. Economic sanctions prohibit or restrict doing business with targeted governments and organisations, as well as individuals and entities that act on their behalf. Sanction prohibitions also may restrict investment in a targeted country, as well as trading in certain goods technology and services with a targeted country. euNetworks Suppliers are required to comply with all economic sanctions and embargoes applicable in their jurisdiction as well as the jurisdictions which govern us: the United Kingdom, European Union, United States and United Nations.

### 3.5 Protecting Information

Our Suppliers must:

**Information Security:** Maintain strong IT and Information Security and comply with Information Security Policies shared by us and agreed with us; a public version of the main Information Security Policy is available on demand. Disclose and ensure any identified vulnerabilities are addressed immediately. Not provide access to euNetworks' information, or customer information, without a legitimate business need, and permission from the responsible owner. Not bypass security controls, restrictions, or any other security measures. Ensure compliance with euNetworks Information Security Management System (ISMS) when access to systems or information is required to fulfil a contract. Report incidents when Information Security of euNetworks is affected, this can be done by sending an email to [informationsecurity@eunetworks.com](mailto:informationsecurity@eunetworks.com).

**Business Continuity:** Where appropriate to the services provided to euNetworks, maintain a documented emergency response and disaster recovery plan to guarantee the protection of data and intellectual property and the business continuity of the services and/or goods being provided to euNetworks. Suppliers will review and test their business continuity plan to ensure it is fully compliant with industry best standards.

**Physical and Intellectual Property:** Respect intellectual property rights, protect confidential information, comply with privacy rules and regulations and adhere, where applicable to their confidentiality agreement with us. Protect and responsibly use the physical and intellectual assets of euNetworks, including intellectual property (copyrights, patents, trademarks, and trade secrets), tangible property, supplies, consumables, and equipment, when authorised by euNetworks to use such assets. Not use euNetworks-provided technology and systems to (1) create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate, or (2) send any false, derogatory, or malicious communications.

**Privacy:** Follow all local privacy and data protection laws. Honour privacy choices by using data only as agreed to by euNetworks' representatives or euNetworks' customers. Provide clear and accurate privacy notices when collecting or processing personal data.

## 4. Monitoring & Evaluation

While euNetworks Suppliers are expected to self-monitor and demonstrate their compliance with the Supplier Code of Conduct, euNetworks may, upon giving reasonable notice, inspect Suppliers

facilities or conduct a remote audit to confirm compliance and may also request that Suppliers shares evidence of certain policies.

Mutual trust and transparent dialogue are central to euNetworks' intentions to continue to grow with Suppliers that show continuous improvements in their sustainability performance. To enable effective performance evaluation and dialogue, euNetworks reserves the right to request sustainability performance data from Suppliers. Suppliers may also be subject to Supplier Self-Assessment questionnaire conducted by euNetworks. To ensure stable compliance with minimum requirements and enable continuous improvement to reach aspirational performance levels, we expect our Suppliers to implement well-functioning management systems. These shall include clear policies, an accountable organisation, routines, communication and feedback mechanisms to identify, correct and improve Environmental, Social and Governance impacts. When submitting information in the Supplier Self-Assessment form on sustainability performance, Suppliers are expected to be transparent and not intentionally mislead euNetworks.

Non-transparency is regarded as a violation of this Code. Transparency is also the essential starting point to recognise and address industry-wide and systemic sustainability challenges. euNetworks will continuously engage with Suppliers, industry, society and governments to promote collective actions and systemic changes needed to improve social and environmental sustainability. euNetworks encourages our Suppliers to do the same. euNetworks may review and update this Code from time to time to reflect current best practice.

## **5. Consequences of Non-Compliance**

Suppliers that behave in a manner that is unlawful or inconsistent with the Supplier Code of Conduct, or any euNetworks policy, risk termination of their business relationship with euNetworks.

It is the duty of our Suppliers, contractors and employees to report dishonesty, corruption, fraud, labour and human rights concerns, environmental damage or any other unethical behaviour either directly to their primary euNetworks contact or via [legal@eunetworks.com](mailto:legal@eunetworks.com). All reports are dealt with in confidence.

## 6. Signatory

As a Supplier to euNetworks Group Limited and/or its group companies (“euNetworks”), we commit to complying with the fundamental requirements set out in this Supplier Code of Conduct, and to implement them in our operations as well as aim to realise them throughout our supply chain.

We also understand that euNetworks has the ambition to engage and continue to grow with Suppliers that share its sustainability ambition beyond mere compliance with the laws to advance social and environmental sustainability. Accordingly, we agree to be monitored and evaluated on our sustainability performance within the areas described in this Supplier Code of Conduct.

We confirm our agreement to the terms of this Supplier Code of Conduct.

### **AGREED AND ACCEPTED**

**SIGNED** by a signatory, duly authorised on behalf of

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Company Name and registered address (Supplier)

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Full Name (Please Print)

Full Name (Please Print), (optional)

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Position

Position, (optional)

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Location, Date, Signature

Location, Date, Signature, (optional)