



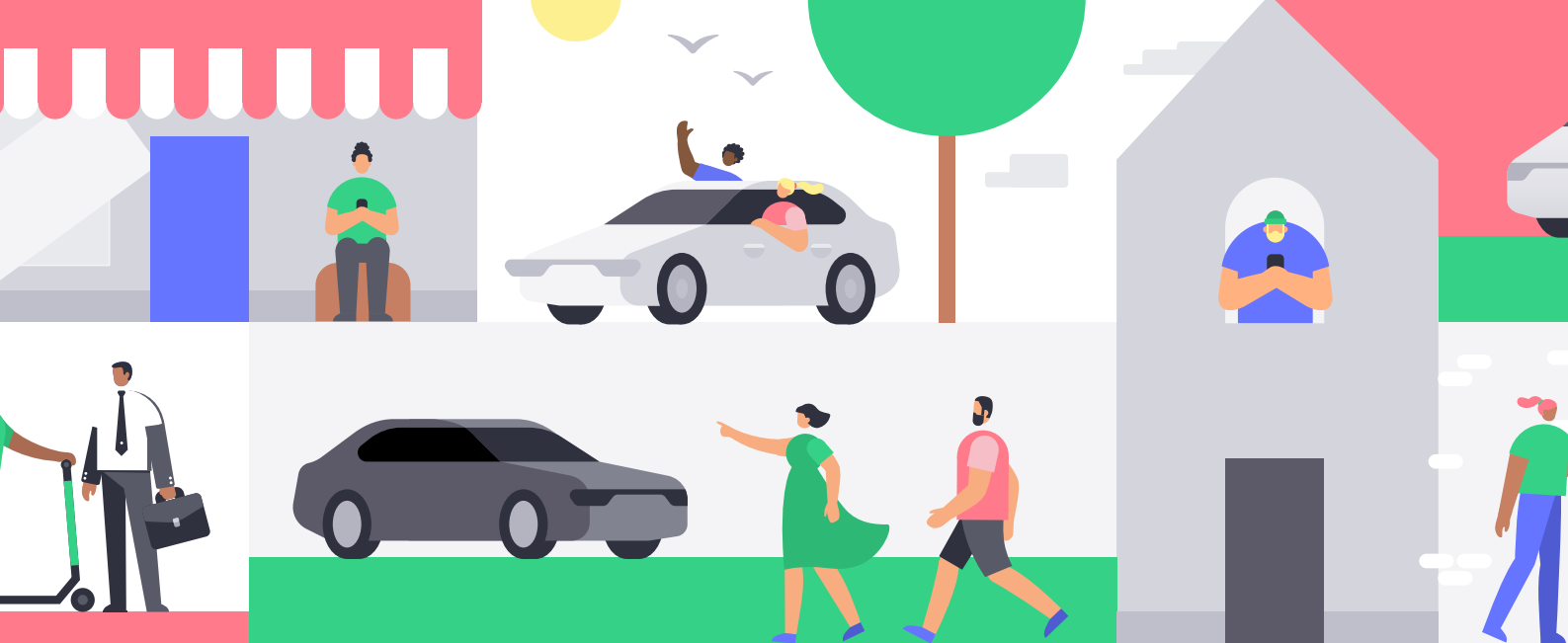
# Supplier Code of Conduct



# Introduction



**Bolt**



# Bolt is the first European mobility super-app.

Our core purpose as a business is to accelerate the shift from private cars towards light vehicles such as scooters and e-bikes and shared mobility options like ride-hailing and car sharing.

**This shift is a core part of our mission: to build cities for people, not cars.**

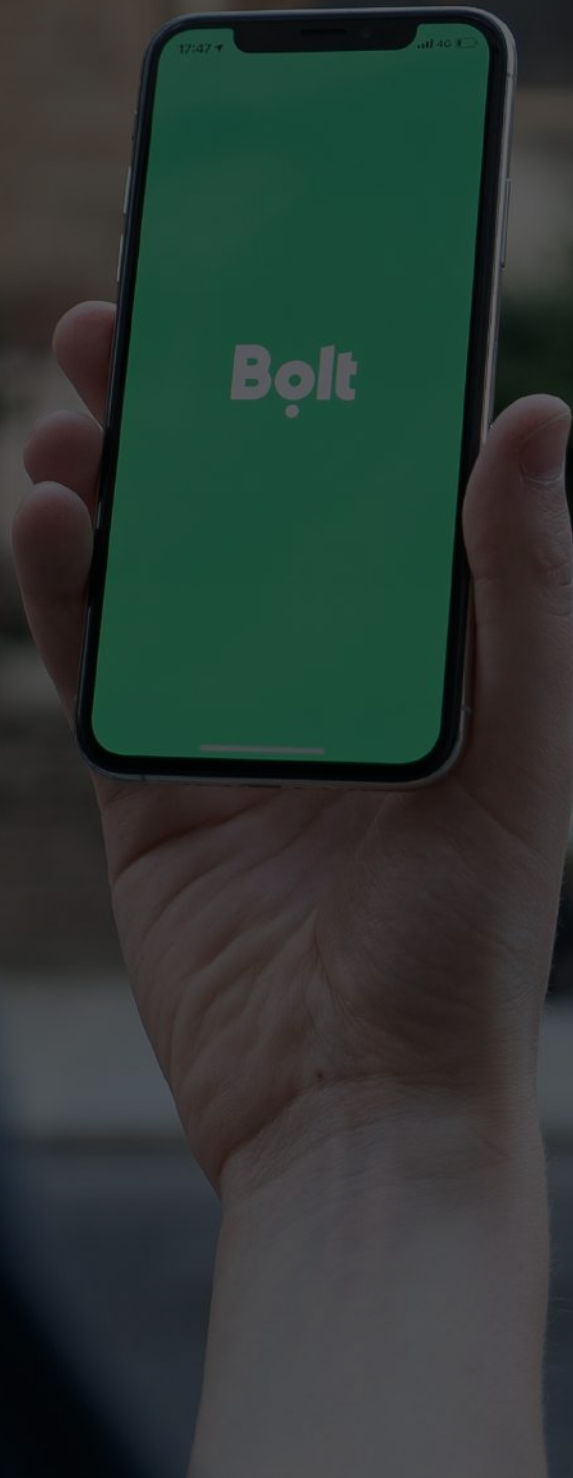
We acknowledge the complexity of global supply chains and their impacts and risks. This Supplier Code of Conduct aims to clarify the requirements our suppliers must comply with when doing business with or on behalf of us.

**At Bolt, we recognise that there may be cases where it's challenging to meet all requirements at once. However, we're committed to strengthening responsible business practices and maintaining high ethical standards with our suppliers.**

**Finally, the Bolt Supplier Code of Conduct is a collection of general principles that outlines ethical behaviour standards for Bolt suppliers.**

This Supplier Code of Conduct doesn't describe every possible situation we or our suppliers might encounter. Any unregulated situations should be solved via mutual cooperation and good faith while following international and industry standards and best practices.

# Scope and applicability



# This Supplier Code of Conduct (SCoC)

This Supplier Code of Conduct (SCoC) establishes the principles of responsible business operations, in particular, but not limited to, human rights, labour rights and conditions, environmental responsibility, and the fight against corruption. **We aim to work with suppliers who seek excellence in these areas.** Bolt's mission of making cities for people, not cars, is closely related to these principles.

A supplier, including their subsidiaries, agents, affiliates, and sub-contractors, is a person, company, or organisation that sells or supplies something to Bolt or any of its subsidiaries, either directly or indirectly.

Suppliers conducting business with or on behalf of Bolt must – in all their activities – abide by this SCoC (even if it stipulates higher standards than those required by national laws or other applicable laws and regulations) and all relevant applicable laws and regulations that govern their business.

**Suppliers are strongly encouraged to observe international and industry standards and best practices.**

If necessary, Bolt may apply more detailed rules and guidance on some principles.

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**We expect suppliers to support the principles of a number of international declarations, conventions, and guidelines, such as:**



The United Nations' Universal Declaration of Human Rights



The Fundamental Conventions of the International Labour Organization



The OECD Guidelines for Multinational Enterprises



The UN Guiding Principles on Business and Human Rights



The United Nations Global Compact Principles



Children's Rights and Business Principles



# Law and Compliance



**Bolt**

## 01

**Suppliers shall comply with all relevant and applicable laws and regulations and the requirements in this SCoC, and observe international and industry standards and best practices.**

Compliance with the requirements outlined in this SCoC is mandatory, even when these requirements stipulate higher standards than those required by national laws or other applicable laws and regulations. In case of a conflict between legal requirements and the SCoC, suppliers shall consult with Bolt without undue delay.

## 03

Suppliers must not, at any time, **engage in the facilitation of tax evasion** as part of their work for or on behalf of Bolt or otherwise engage in any conduct which might result in liability for Bolt under the tax authority.

## 05

**The Supplier conducts its business in an open, fair, and competitive manner.**  
The supplier will not engage in price-fixing or other unfair trade practices.

## 02

**It is the Supplier's responsibility to enforce and verify legal compliance and compliance with this SCoC within its own operations and through its supply chain.**

The supplier shall maintain relevant and complete documentation and records to show such compliance. Bolt is entitled to verify compliance with the SCoC through established assessment mechanisms.

## 04

**At Bolt, we don't allow any form of corruption or bribery, anywhere, at any time.** The Supplier never accepts, asks for, engages in, makes, offers, promises, or authorises any bribes. With corruption, we mean dishonest or illegal behaviour, such as embezzlement, abuse of power, fraud, deception, nepotism, and collusion.

With bribery, we mean an act of offering or receiving something of value in exchange for some kind of influence or action in return, which involves dishonestly persuading someone to act in your favour by giving them a gift of money or another inducement.

## 06

**Suppliers should avoid any situation where a person or supplier's interest conflicts or appears to conflict with the interests of Bolt.**

This includes avoiding situations in which the supplier participates in an activity or influences Bolt's decision that may result in a personal gain for the supplier, its affiliate directors, employees, agents, consultants, contractors, personnel, and other representatives such as individuals serving as government officials, or family members or friends in relation to any of the above-mentioned categories.

The Supplier should immediately disclose to Bolt any situation in which the supplier perceives a potential conflict of interest so that appropriate action can be taken.

## 07

**Suppliers must not participate in money laundering** and must not acquire, use, convert, conceal or possess the proceeds of crime, help another person to do so, or assist terrorist financing in any way.

**Suppliers shall not have dealings with persons, companies, or organisations that are subject to international economic sanctions.**



# Human Rights



**Bolt**



# 01

**Suppliers must ensure that the human rights of their workers are respected, and policies upholding them are in place.**

Workers shall be treated with dignity and respect, regardless of their function. This should apply to all employees, including temporary, students (interns), and contractors.

# 03

**The supplier guarantees that all of its employment relationships are freely chosen,** free from threats, and the supplier's employees are always free to leave their employment after the due notice period. The supplier does not operate with any form of compulsory, bonded, or forced labour, including human trafficking.

# 05

**Harassment or discrimination due to gender, race, ethnicity, age, sexual orientation, disability, politics, religion, transgender identity, or expression shall be forbidden.**

Every employee hired by the supplier engaged with Bolt shall be treated with respect and dignity.

# 02

**Suppliers shall uphold international and local child labour standards in all their dealings across all our businesses.**

No one below the country's legal minimum working age or below the age stated in the Fundamental Conventions of the International Labour Organization – for the cases which are not regulated explicitly – shall be employed by any supplier.

Suppliers shall not exploit workers with work that keeps them away from the schooling they're entitled to, nor perform night shifts and overtime or any other work that is heavy, hazardous, or unsafe to their physical and mental health and moral or social development.

# 04

**The supplier shall be committed to hiring and treating its employees on equal terms** and does not allow any discrimination with regard to sex, gender, gender identity, nationality, religion, belief system, race, age, disability, sexual orientation, political opinion, marital status, veteran status, union membership or social or ethnic origin.

Suppliers must seek to eliminate any type of discrimination in their workforce and promote a culture of equal opportunities and diversity in which appointments to jobs, wages, benefits, leadership, personal development, and access to training depend on each individual's ability and performance.

# Labour

A photograph of two men sitting at a table, looking at a laptop. The man on the left is wearing glasses and a white t-shirt with a black graphic. The man on the right has long hair and a beard, also wearing a white t-shirt. They are both wearing green lanyards. The background is blurred, showing other people at a similar event.

**Bolt**

## 01

**The supplier shall adopt and adhere to rules and conditions of employment that respect workers and safeguard their rights under national and international labour and social security laws and regulations.**

The supplier commits to upholding decent labour standards and providing a work environment for its employees to perform decent and productive work in conditions of freedom, equity, security, and dignity.

INTERNATIONAL LABOUR AND SOCIAL SECURITY LAWS AND REGULATIONS ↗

## 03

**The supplier will always provide all employees with timely payment and clear information related to their wages and benefits for each pay period;** reimburse overtime pay rates at a premium rate as defined by national laws, collective bargaining agreements, or industry standards; not allow deductions from wages for disciplinary purposes or any financial punishment.

## 06

**Bolt does not permit subcontracting without our prior written approval.** Approved suppliers must be regularly monitored and assessed to ensure their performance is in line with Bolt's SCoC.

## 02

**The supplier will always provide its employees with a living wage sufficient** to meet the basic needs of employees and to provide some discretionary income, and when applicable, a salary shall be based on criteria set by collective bargaining agreements.

## 04

**The supplier will always comply with applicable laws, regulations, and best practices with regard to working hours and overtime.** The supplier recognises the right to sufficient rest and leisure and aims to prevent their employees from working excessive hours.

## 05

**Suppliers shall not require workers to work more than the regular overtime hours** allowed by the law of the country where the workers are employed, but at a minimum level, what the relevant international labour standards foresee.

Suppliers shall follow at least the minimum requirements for the duration of a regular work week. Suppliers will ensure that employees shall not work overtime on a regular basis and that overtime is voluntary. The supplier shall provide employees with rest, leave periods, and time off for legally recognised holidays.



# Health and Safety

Business Continuity

**Bolt**

MA VILLE EN TOUTE SÉCURITÉ

**Bolt**



### 01

**Suppliers shall make proper provisions for the health, safety, and welfare of their workers, visitors, contractors and anyone affected by their activities.**

Suppliers shall maintain safe and healthy working conditions according to local laws and regulations and integrate sound health and safety management practices into their business. Suppliers shall provide workers with the right and means to refuse unsafe work and to report unhealthy working conditions.

### 02

Suppliers shall conduct hazard assessments that identify and evaluate occupational health and safety hazards and shall manage these hazards through a prioritised process of hazard elimination, engineering controls, and/or administrative controls.

### 03

Suppliers holding ISO 45001 (Occupational Health and Safety Management Systems) certification shall be prioritised.

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## BUSINESS CONTINUITY

### 01

**Suppliers should have a Business Continuity Plan (BCP),** which clearly details what will happen in the event of an unforeseen event. Suppliers should have a disaster recovery plan which is regularly tested and reviewed.

# Quality

**Bolt**



**Bolt**

# 01

**Suppliers must ensure that they have processes in place to consistently provide products and services that meet legal requirements and customer expectations.**

Continuous improvement must play a key role in the supplier's activities, with a process-oriented approach to documenting and reviewing the structure, responsibilities, and procedures required to achieve effective quality management.

# 02

Suppliers holding ISO 9001 (Quality Management Systems) certification shall be prioritised.

# Environment



**Bolt**

# Bolt is committed to finding and implementing solutions to be inherently sustainable in our business activities.

We prefer business partners who prioritise the environment and have their own sustainability goals and objectives. **We expect our suppliers to:**

01

**Be compliant with all applicable local and national environmental regulations** and all required environmental permits.

02

**Develop and maintain environmental policies** and a management system to continuously improve the environmental performance of their business – minimising the negative environmental impacts of their operations.

03

**Monitor and disclose information regarding environmental impacts** such as: emissions, energy usage and materials, waste generation, and significant waste-related impacts.

04

Be proactive in identifying, reducing, or avoiding environmental risks and ensuring emergency and contingency plans are in place in case of accidents and incidents.

05

**Suppliers must commit to humane practices towards animals**, applying the best standards and technologies available to promote their well-being and minimise suffering.

06

Suppliers holding ISO 14001 (Environmental Management Systems) certification shall be prioritised.



# Right to Audit



## 01

**Bolt maintains the right to audit any supplier on-site or remotely, directly or through a third party, to verify if all criteria in this Code are met.** Suppliers must cooperate with Bolt during the investigations related to violations or potential violations of this SCoC, giving access to documents and employees where reasonably requested by Bolt.

## 02

**Bolt may require suppliers to maintain records to demonstrate that their conduct is legal, ethical, appropriate, and compliant with SCoC at all times and make those records available for audit by Bolt.**

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## Where the Supplier processes personal data, the Supplier shall:

### 01

adhere and comply with its respective obligations under the applicable data protection laws

### 02

apply proper technical and organisational data protection measures

### 03

inform Bolt immediately about any data processing incidents or breaches related to the Supplier's cooperation with Bolt

### 04

reasonably assist Bolt in responding to the requests of data subjects and authorised public authorities if related to Bolt's cooperation with the Supplier

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## 04

**Suppliers must maintain an overarching data protection policy that demonstrates compliance with their requirements, including processing, privacy by design, and record keeping.**

All employees must be trained on data protection requirements and principles – including processing activities, controls, privacy impact assessments, audits, data subject rights, etc.

# Detailed rules and guidance

Below, you'll find detailed rules and guidance on some of Bolt's principles. These rules and guidances are subject to change from time to time:

[INFORMATION SECURITY CODE OF PRACTICE](#) ↗

## Contact us

In case of a conflict between legal requirements and the SCoC, or situations that ought to be solved with mutual cooperation, please contact us at **supplier.compliance@bolt.eu**. We welcome you to write in your local language. All information we receive will be kept in strict confidence, and your identity will be protected.