



intive

# Supplier Code of Conduct

January 2024



# Content

- Introduction ..... 3
- Speaking up ..... 5
- You respect the people ..... 6
  - Fair Labor Practices ..... 7
  - Diversity and Inclusion ..... 9
  - Employee health and safety .....10
  - Conflict of interest ..... 11
  - Employee wellbeing and .....12
  - development.....12
- You respect the law .....13
  - Export laws .....14
  - International sanctions.....15
  - Anti-corruption and gifts .....16
  - Fair competition ..... 17
  - Confidential Information, .....18
  - Personal Data and .....18
  - Intellectual Property.....18
  - Integrated quality management .....19
  - system and information security .....19
- You respect the environment ..... 20
  - Legal provisions .....21
  - Sustainable resource management ..... 22
  - Travel and transport management..... 23
  - Animal Welfare ..... 24
  - Greenhouse gas emissions ..... 25
  - and responsible use of energy ..... 25
  - Waste management..... 26
  - Air Quality .....27
- A closing note ..... 28

# Introduction

At intive, we believe that business culture has real impact: We strive to use each opportunity to make a positive change. We're responsible for how we run our operations and how it affects peoples' lives and shapes the future. The way we act as intivers matters just as much as the services and solutions we provide. This is expressed in our Code of Conduct that came into force in June 2019 and is constantly reviewed and improved, to reflect our professional standards and address current regulations that impact our day-to-day activities.

You, as **our partner and supplier**, providing to intive any product or service, co-create the business culture with us. We'd like to make sure we share common values, maintain the highest ethical standards, and adhere to all applicable laws. Therefore, we've incorporated the principles of corporate responsibility into our purchasing processes, forming this **Supplier Code of Conduct**.

This document applies to suppliers of goods and services along with their employees and is valid throughout the supply process and the duration of the contract. It also addresses any subcontractors, agents or other third parties that you engage with in your work for us, if allowed in our agreement.

This document doesn't refer to any minor transactions, as well as transactions of small value or orders not regulated by a mutual contract.

We work together to contribute to numerous success stories driven by technology expertise and inspired, passionate people. **Our standards can be met only with your cooperation and commitment.**

*Diego Rubio Robert Price*

In our business operations, we look for suppliers that are as committed as we are to achieve their goals in an ethical way.

We pay great attention to the selection process of our suppliers and carefully consider supplier background and qualifications.

A man with a beard and short dark hair, wearing a white t-shirt, is shown from the chest up. He is holding a yellow and white megaphone to his mouth and shouting with an open mouth and wide eyes. The background is a solid light blue. A semi-transparent dark blue rectangular box is overlaid on the left side of the image, containing the text 'Speaking up' in white. The overall lighting is bright and even.

# Speaking up

# Speaking up

If you identified or suspect any breach of European Union or national law, intive's **Code of Conduct** or **Supplier Code of Conduct**, as well as any other intive policy or procedure, you can contact our *speak up* service and report it. The service is available at our website, in the governance section, under this [link](#), where you can find further information on the disclosure submission process.

We assure you that each submission will be treated as highly confidential and your identity will be protected. We also encourage you to implement such a reporting channel in your own company.





A man with a beard and glasses is wearing large headphones. He is looking directly at the camera. The image is lit with blue and red light. A blue rectangular box is overlaid on the left side of the image, containing white text.

**You respect  
the people**

# Fair Labor Practices

## Child Labor

You will not employ children under the legal age of employment. If the minimum age of employment is not defined in a country you operate in, you agree not to employ anyone under the age of 15. Employees under the age of 18 can only perform work in accordance with legal requirements.

## Forced Labor

You do not tolerate the use of any form of forced, bonded or involuntary labor. Workers must be allowed to maintain control over their identification documents and you shall ensure that they do not pay fees or make any payment connected to obtaining employment throughout the hiring process.

## Compensation and Working Hours

You comply with all applicable national laws regarding employment, in particular working hours, overtime, wages and benefits.

You pay employees in a timely manner and clearly define the basis on which workers are being paid. Deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted. The terms and conditions of employment must be disclosed to the worker in an accessible and understandable format and language.

At intive, we always protect diversity and provide equal opportunities. We believe that everyone has a voice and both intivers' and our clients' & suppliers' feedback is important to us.

We also pay great attention to the wellbeing and development of our people. Happy people make our customers happy.

### **Freedom of Association**

Your employees are free to join (or refrain from joining) workers organizations, unions, and other employee representation of their choice, without facing threat or intimidation. You respect their right to collectively bargain in accordance with applicable laws.

### **Fair Treatment**

You do not discriminate against, or tolerate discrimination regarding racial or ethnic origin, nationality, pregnancy status, sex, gender identity or expression, sex life or sexual orientation, age, mental or physical disability, medical condition, marital status, veteran status, political opinions, personal interests, religious or philosophical beliefs, trade union membership, employment conditions or any other characteristics. You do not engage in any harsh treatment, including violence, threats, bullying or sexual abuse. You should also react, if you witness any of these.

### **Grievance procedure**

You provide employees with effective grievance procedures for raising all kinds of workplace misconduct, including concerns involving harassment, bullying and discrimination. You should also prevent all forms of possible retaliation.





# Diversity and inclusion

You promote an inclusive work environment that values the diversity of employees and provides equal opportunity in the workplace. You encourage diversity at all levels of your workforce and leadership.

## Women's rights

You should eliminate gender-based discrimination and ensure equal opportunities and treatment for all women. This includes equal opportunity in employment and committing to equal pay for equal work.

## Rights of Minorities and Indigenous Peoples

Your policies should align with international human rights standards and ensure that these rights are respected and protected. You should respect the rights of local communities.



# Employee health and safety

You strive to implement high standards of occupational health and safety by applying health and safety management approach appropriate for the industry. You comply with all legal provisions in the range of occupational health and safety. You also provide a work environment that is safe and conducive to good health, in order to preserve the wellbeing of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses. Employees are adequately educated and trained to observe health and safety measures. Health and safety related information is available and accessible to all in your facility.



# Conflict of interest

A conflict of interest arises when an individual has a private/personal interest which could appear to influence their decisions. Such situations include a relationship by blood or marriage, partnership, business partnership or investment. If you feel that you have any actual or potential conflict of interest with intive's personnel and it may influence intive in any way, you shall disclose it as soon as possible using the following address: **ComplianceTeam@intive.com**.

Also, if you know about any other conflict of interest that may be connected to intive, and even if it does not relate to you personally, you can use intive speak up.- service.

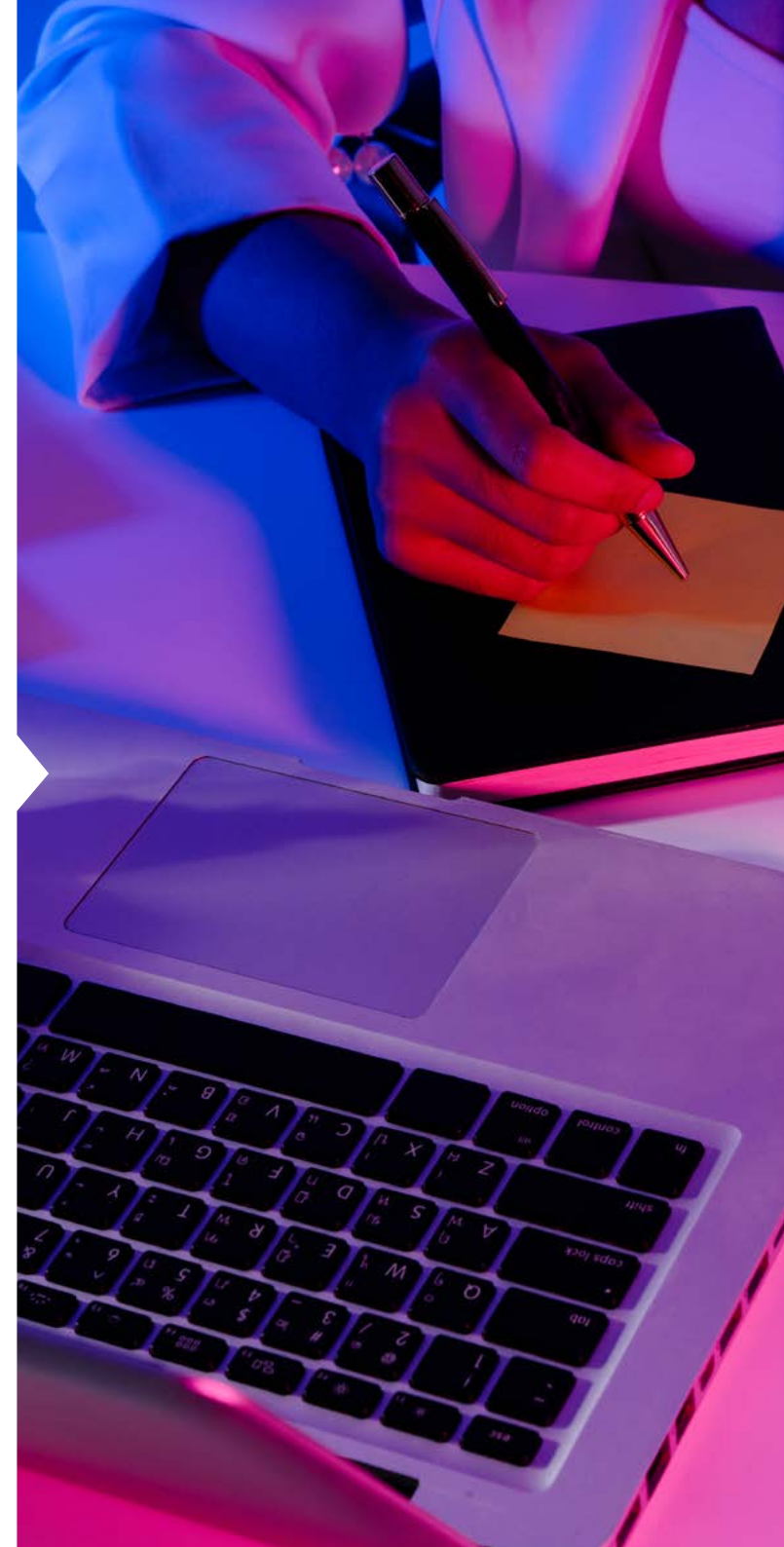




# Employee wellbeing and development

You treat employees with respect and dignity and show zero-tolerance towards any kind of violence or hostility, including verbal attacks, threats, intimidation, or weapon possession on your premises. You strive to create a workplace that is safe but also friendly to the employees. You ensure opportunities for the development of employee competences, promote healthy lifestyle and support activities that enhance employee health, well-being and work-life balance.

You will abide by the prohibition on hiring or using private or public security forces to protect a business project if, due to a lack of instructions or control by the company, the prohibition on torture and cruel, inhuman or degrading treatment is disregarded during the deployment of security forces or if life and health are injured in any other manner.





**You respect  
the law**



# Export laws

Unless agreed otherwise in the contract with intive, or in any Statement of Work, you will be responsible for obtaining and paying for all applicable licenses, authorizations, and permits required of you in connection with the performance of the services, or with the product provision. You agree to comply with all applicable export laws and regulations of all applicable jurisdictions.

At intive, we conduct business with the highest standards of honesty, propriety and integrity, and in compliance with all applicable laws and regulations.

# International sanctions

You comply with all laws applicable, with respect to sanctions, in particular by the U.S. government, the UNSC, the EU, HMT or other relevant sanctions authority imposing export controls, trade sanctions restrictive measures and other mandatory regulations of the same nature ("Sanction Laws"), including designating countries, entities and persons ("Sanctions Targets").

You do not, directly or indirectly, export, re-export or otherwise deliver any proceeds or services to a Sanctions Target, finance or otherwise facilitate any transaction in violation of any Sanction Laws.

You, your affiliates and, to your knowledge, your employees, officers and agents are not subject to any sanctions resulting from Sanctions Laws ("Sanctions").

You and any of your subsidiaries are not located, organized or resident in a country or territory that is the subject or target of Sanctions.

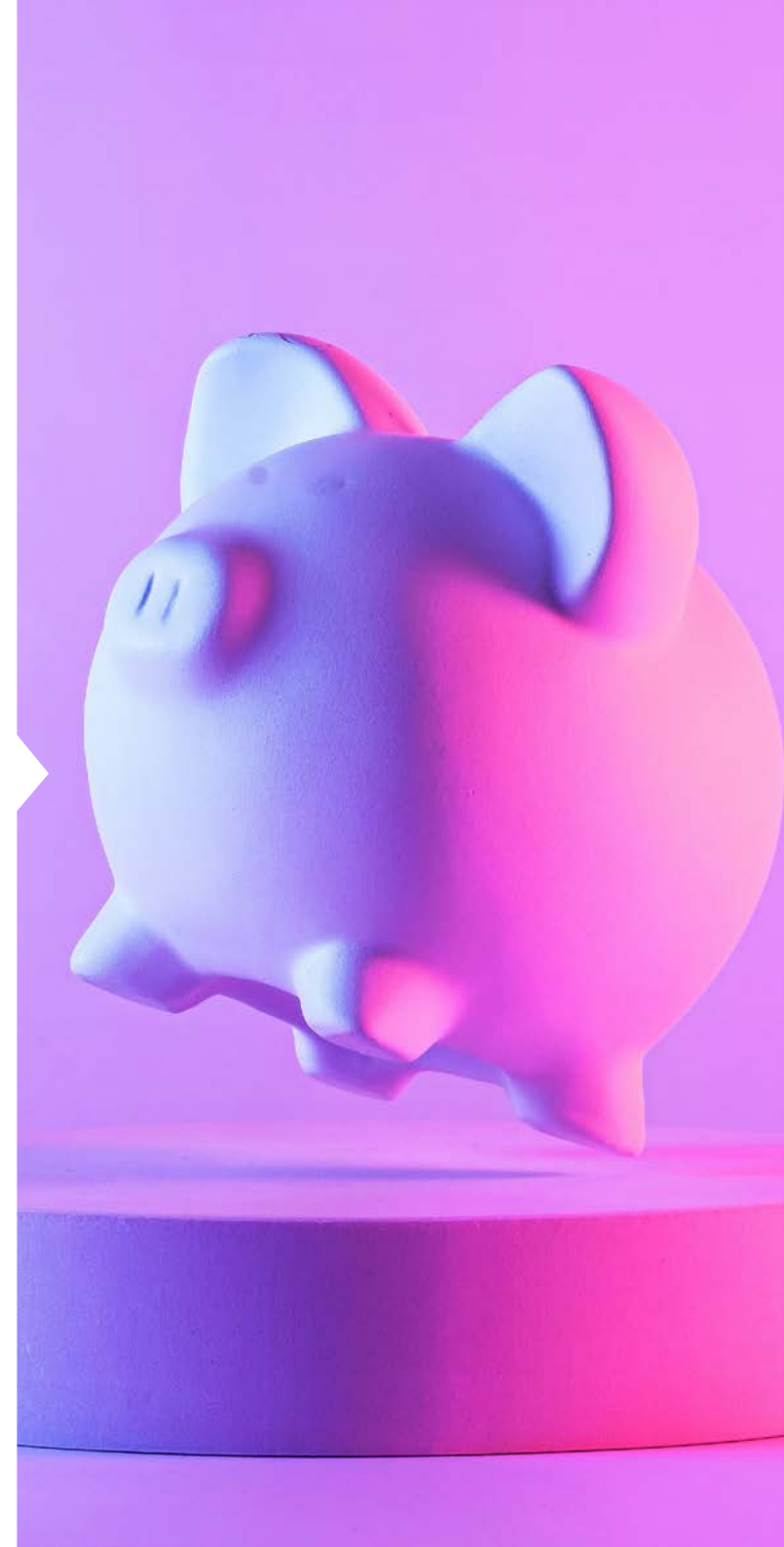
For the past five years, you and any of your subsidiaries have not and are not now knowingly engaged in, any dealings or transactions with any person that at the time of the dealing or transaction is or was the subject or the target of Sanctions or with any Sanctioned Country.



# Anti-corruption and gifts

You comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations and standards. You do not give, promise or authorize an offer for anything of value to anyone, including public officials, for the purpose of gaining an improper business advantage or placing undue influence on the recipient. The offering itself can take many forms, from money (facilitation payments) to benefits such as gifts and entertainment of unreasonably high value. An “improper business advantage” can take forms such as preferential treatment, contract conclusion or the disclosure of confidential information.

You do not offer, promise or provide to any intiver or their family member a kickback, favor, gratuity, entertainment or anything of value, to obtain favorable treatment. Our employees are similarly prohibited from soliciting such favors from you. intivers are only allowed to grant or receive gifts or entertainment of a small value and courtesy nature, given openly, in a regular business context. They may not, however, have any impact on the receivers’ actions or violate any laws or other internal procedures. To avoid doubt, we implemented an “Anti-bribery and corruption policy” which provides clear guidance and encompasses numerous reporting and monitoring controls.



# Fair competition

Fair competition laws are introduced to promote dynamic market growth by regulating anti-competitive conduct by companies. They address areas such as illegal agreements between competitors that restrict free trading and competition, abusive behavior by a company dominating a market, exclusivity arrangements or pricing. You comply with all applicable competition laws and in particular you do not fix prices, rig bids, allocate customers or markets or exchange current, recent, or future pricing information with your competitors.



# Confidential Information, Personal Data and Intellectual Property

You and your contractors and employees maintain confidentiality with regard to all intive confidential and business sensitive information you have access to, in accordance with applicable laws or applicable contracts. You protect and must not misuse any intellectual property belonging to intive, our customers, other suppliers and individuals such as code, processes, procedures, copyrighted work, ideas, trade secrets, patents and know-how. You protect personal data and comply with all data protection laws applicable to your business activity. If you are entrusted by intive with personal data or you entrust personal data with intive, the data-processing entrustment relationship should be covered by a Data Processing Agreement.

Be honest and truthful in your communication not only with us, but also with regulators or other stakeholders. Do not make any statements on behalf of intive if not authorized in writing, in particular do not speak to the press.

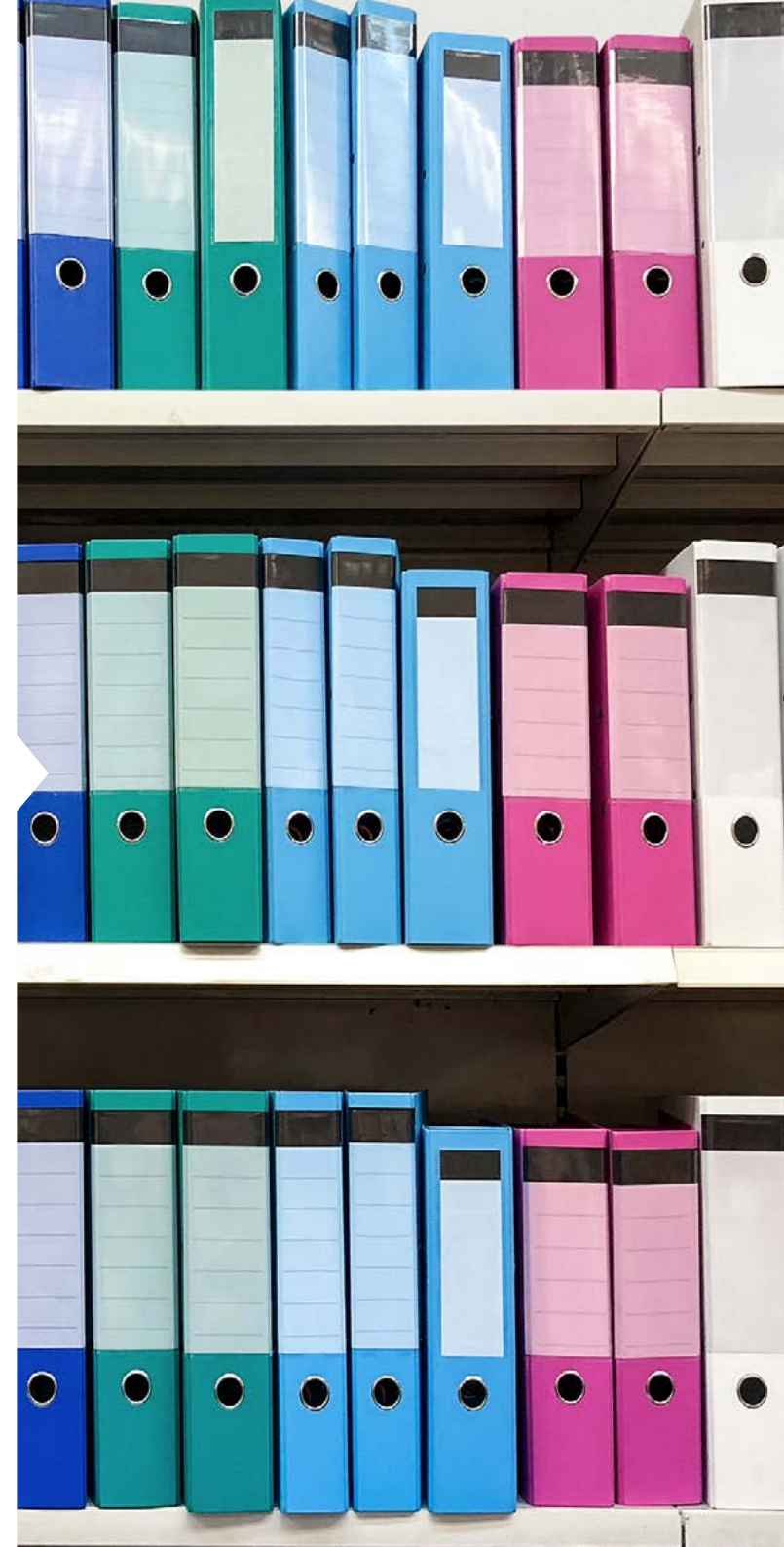


# Integrated quality management system and information security (ISO 9001 and ISO/IEC 27001)

At intive, we pay great attention to information security and the quality of our services. It is very important for us to cooperate mainly with companies that have implemented ISO 9001 and ISO/IEC 27001, appointed persons responsible for quality and information security, and whose employees have received quality and information security training.

## **Following security principles shall be acknowledged:**

1. Company assets (such as information, IT systems and IT applications) have appointed owners which are responsible for the security of the respective company assets.
2. Risks to assets must be identified as early as possible and be minimized to an acceptable residual risk.
3. Security measures and regulations are based on recognized standards, and best practices for information security.
4. Legal, contractual, and other requirements on information systems are to be identified. Appropriate security measures shall be implemented to meet these requirements.
5. Physical and logical access to information assets shall be limited on a need-to-know and least-privilege basis.
6. All information security activities must be transparent and comprehensible. Procedures for operating and restoring essential information systems shall be created.
7. Information security events, incidents and weaknesses shall be identified, analyzed and where applicable reported to intive.
8. Efficiency of information security regulations and measures is continually reviewed and improved.



The image features a vibrant green leaf with prominent veins, positioned on the right side. The background is a dark blue surface with a complex, glowing white circuit board pattern. A solid blue rectangular area is overlaid on the left side, containing white text.

**You respect  
the environment**

# Legal provisions

You comply with all applicable environmental laws, regulations and standards and obtain and maintain all applicable environmental permits, regulatory approvals, and registrations.

You strive to minimize the negative environmental impact of your activities, products and services through a proactive approach such as identifying and eliminating potential risk of a detrimental influence on the environment.

At intive, we hold dear a “think twice” approach. We carefully consider each travel cost and track our carbon footprint. We also build and run our offices with sustainability in mind.

# Sustainable resource management

You are fully compliant with applicable regulatory requirements and standards for sustainable resource management in your area of business. Beyond regulations, you strive to manage resources in a way that will benefit current and future generations.

Based on materiality/relevance in regards to your business model, you are considering natural resources like raw materials, water, air, and land, as well as processed goods, which you procure as inputs. You respect the applicable land tenure rights and water rights, in particular, committing to avoid forced evictions and deprivation of land, forests and waters when acquiring, developing or otherwise using land, forests and waters.

You will also look into outputs, e.g. by adopting sustainable management of waste or air emissions. If required, you will determine the condition of the soil in your area of responsibility and establish appropriate measures to maintain and improve soil quality. You are handling hazardous substances with special care and in line with regulatory standards.





# Travel and transport management

You try to minimize all transportation and logistics activities in order to optimize your processes and reduce the number of unnecessary journeys. You try to avoid any unnecessary travel (for instance by switching to videoconference tools) and choose adequate means of transportation that help both your business goals and the environment.

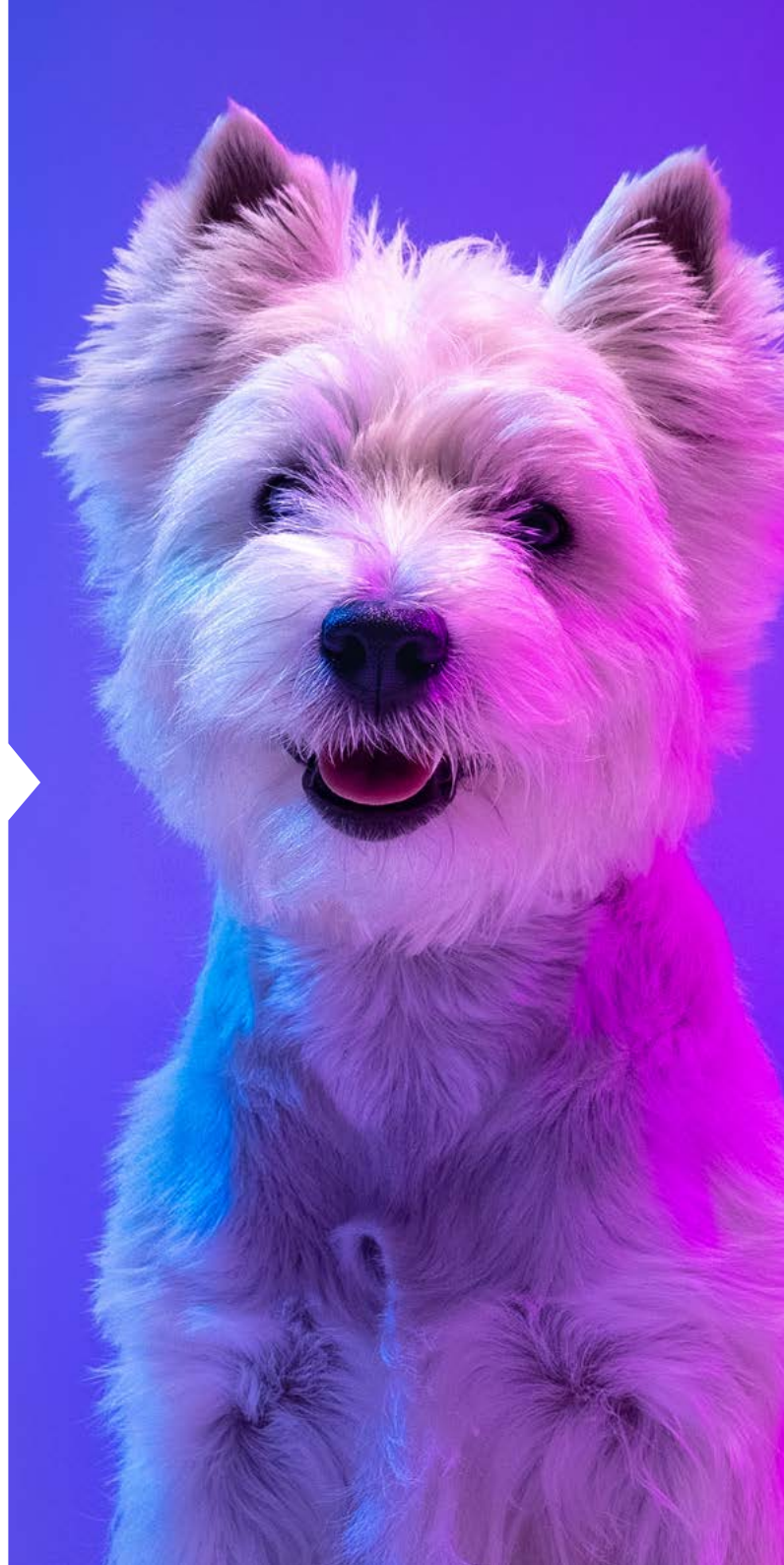




# Animal Welfare

You adhere to the highest standards of ethical conduct. With respect to animal welfare, you remain in compliance with all legal requirements and, where applicable, implement industry-leading policies and practices related to the ethical treatment of animals.

intive is committed to believing in the humane treatment of animals, including freedom from thirst and starvation, freedom from discomfort, pain, injury and disease, freedom to express normal behavior, and freedom from fear and distress.



# Greenhouse gas emissions and responsible use of energy

You seek to minimize emissions of greenhouse gases, including carbon dioxide, resulting directly or indirectly from your activities within the scope adequate to the scale and type of your operations.

You make an effort to procure energy from renewable and clean sources. You try to offset your carbon footprint to compensate for your emissions by funding an equivalent carbon dioxide saving elsewhere.



# Waste management and noise

You strive to minimize the generation of all types of waste, including water, raw materials and chemicals (responsible chemical management) associated with your operations.

You ensure proper management of the generated waste, including cooperation with authorized waste recipients. Where applicable, you recycle, re-use, or substitute materials to reduce the impact of waste on the environment.

You determine the levels of noise released by your operations into the environment from various sources and you establish measures to improve noise emissions for both your employees and contractors, as well as for the environment.



# Air Quality

You seek to minimize air emissions, especially air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be effectively managed in accordance with local laws, regulations and generally accepted international standards.





# A closing note

A woman with blonde hair tied back is shown in profile, smiling as she looks at her smartphone. She is wearing a light-colored jacket. The background consists of horizontal slats, possibly a window blind, illuminated with warm yellow light. A solid blue rectangular overlay is positioned on the left side of the image, containing the text 'A closing note' in white.



We expect that you'll constantly advance in respecting the labor, law and environmental standards determined in this Supplier Code of Conduct.

We also **anticipate** that you will implement your own binding guidelines for ethical behavior, and impose similar standards (i.e. having the same effect as described in this Supplier Code of Conduct) on your suppliers, where appropriate and practicably possible. By cooperating with intive you accept your obligation to pass those standards along your supply chain.

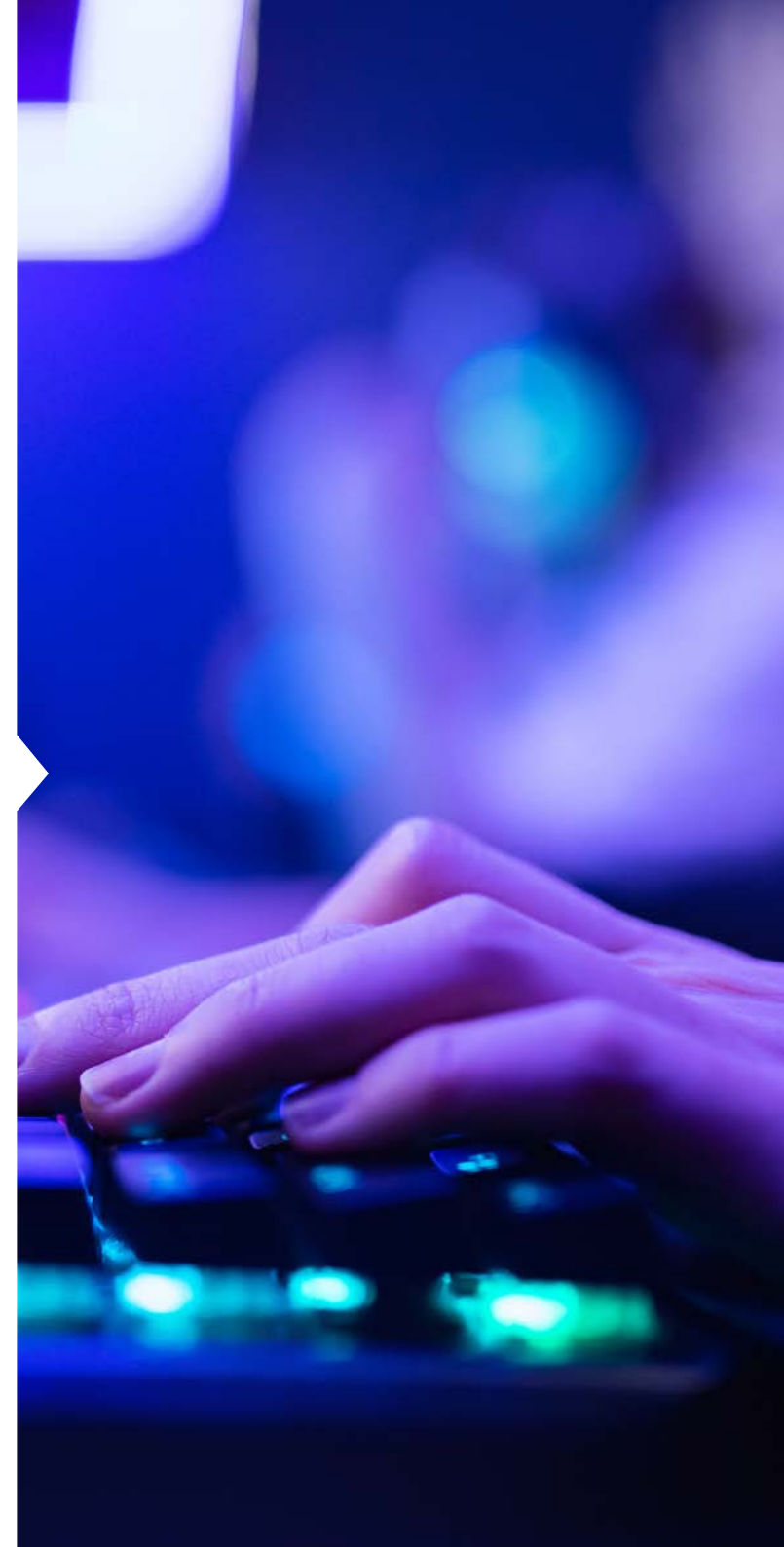
However, if your activities are inconsistent with the standards of responsible business, we expect that you'll take actions to improve.

You are expected to self-monitor and demonstrate your compliance with this code, however, upon reasonable notice we may verify your compliance with our guidelines stipulated in this document. Please note that we may terminate a contract with you if you violate this Supplier Code of Conduct or refuse, if asked, to take part in a remediation plan.

At the same time, we reserve the right to exclude you from any procurement processes, if you do not show high ethical standards and compliance with guidelines stipulated in intive's Supplier Code of Conduct or with relevant laws. Also, if you've noticed that we ourselves don't follow our own standards in any of the presented areas, please let us know.

Any improper behavior you know of or suspect will be investigated. Please contact us at: **ComplianceTeam@intive.com** or use intive speak up service.

**Thank you for your support and engagement.**



**intive**

