

POLICIES & PROCEDURES

Global supplier code of conduct

1. Introduction	3
2. Safety.....	4
3. Service Excellence.....	6
4. People	7
5. Financial Responsibility	8
6. Integrity	9
7. Global supplier code of conduct receipt & acknowledgement.....	10
8. Appendix 1: Business ethics helpline contact details	11

1. Introduction

At EthosEnergy, our business model is based upon a foundation of integrity, ethical conduct and mutual respect, and the trust that results from telling the truth, following the law, treating each other properly, and delivering on our promises. This Global Supplier Code of Conduct defines our standards and explains our expectations and provides guidance to our suppliers for meeting these shared standards.

This Global Supplier Code of Conduct applies to all EthosEnergy suppliers of products or services, including contractors, consultants, suppliers, subcontractors, representatives, or any other third parties. Suppliers are also expected to ensure all employees and third parties they work with in connection with goods or services supplied to EthosEnergy comply with our standards. EthosEnergy's Global Supplier Code of Conduct is aligned with the EthosEnergy Business Ethics Policy. Together these documents provide the standards we expect our suppliers to adhere to.

EthosEnergy also reserves the right to end a business relationship with suppliers if they do not adhere to the Global Supplier Code of Conduct. Where appropriate, a matter may also be reported to the relevant authorities.

As an EthosEnergy Supplier, you hereby declare adherence to the following:



2. Safety

Workplace Health and Safety

- To take responsibility for the health and safety of employees
- To provide employees with a safe and healthy workplace that complies with all applicable health and safety laws and regulations
- To control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases
- To provide training and ensure that employees are educated in health and safety issues
- To refuse to tolerate threats or acts of violence, including intimidation, bullying, and attempts to instill fear in others
- To employ an effective occupational health & safety management system

Environmental Protection

- To act in accordance with applicable laws, regulations, and standards regarding environmental protection, including requirements for chemical and waste management disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting
- To minimize environmental pollution and make continuous improvements in environmental protection
- To employ an effective environmental management system that includes steps to minimize environmental impact, measures and controls, reporting, and training

Product Quality and Safety

- To ensure all products and services meet regulatory quality and safety standards

C-TPAT Minimum Security Requirements (for Business Partners of C-TPAT Certified EthosEnergy Business Units)

- To implement procedural security, including protection protocols for the handling of incoming and outgoing goods against the introduction, exchange, or loss of any legal or illegal material
- To implement physical security, including constructing all buildings of materials which resist unlawful entry and protect against outside intrusion
- To implement access control, including prohibiting unauthorized access to the shipping, loading dock and cargo areas. Visitors refer to: All business clients, including EthosEnergy employees, vendors, delivery drivers, etc.
- To implement personnel security, including being consistent with local laws, factories should conduct employment screening and interviewing of prospective employees to include periodic background checks and application verifications

- To implement container and trucking security, including implementing procedures to verify the physical integrity of the container and / or truck structure prior to stuffing, to include the reliability of the locking mechanisms used on the doors
- To implement technology security, including requiring computers and other applicable technologies use individually assigned accounts that require a periodic change of password. Procedures and policies must be documented and shared with employees in the form of training
- To implement training and threat awareness, including conducting security training and threat awareness program to educate employees on the threats posed by terrorists and contraband smugglers. These programs must encourage active employee participation in recognizing and reporting internal conspiracies, including maintaining cargo integrity and procedures for challenging individuals that are prohibited from accessing specific areas of the facility



3. Service Excellence

Supply Chain

- To use reasonable efforts to promote other suppliers' compliance with this Global Supplier Code of Conduct
- To conduct appropriate due diligence before engaging third parties
- To refrain from subcontracting work performed for EthosEnergy except to suppliers pre-approved by EthosEnergy in writing
- To comply with the principles against unlawful discrimination with regard to supplier selection and treatment
- To ensure compliance with the requirements of any contracts and obligations



4. People

Anti-Slavery and Human Rights

- To promote equal opportunities for and treatment of employees irrespective of gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, color, nationality, ethnicity or national origin, disability, age, pregnancy, genetic information or any other status or basis protected by law
- To respect the personal dignity, privacy and rights of each individual
- To refuse to make anyone work against their will including through forced labor / debt bondage
- To follow all applicable laws and regulations regarding child labor, including not employing any workers under the age of 15 or, in those countries subject to the developing country exception Article 2.4 of International Labor Organization Convention 138, to not employ any workers under the age of 14
- To refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination
- To prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitive
- To provide fair remuneration and to guarantee the applicable statutory minimum wage
- To ensure that working hours, including overtime, do not exceed applicable legal limits
- To recognize the right of free association of employees and to neither favor, nor discriminate against, members of employee organizations or trade unions
- To notify EthosEnergy immediately on becoming aware of a personal data breach under the General Data Protection Regulation or other applicable legislation
- To abide by the UK Modern Slavery Act and take responsible steps to eliminate modern slavery from your supply chain, including child labor, human trafficking, forced labor / debt bondage, sexual exploitation, forced and early marriage, criminal exploitation, and domestic servitude
- To comply with local human right laws



5. Financial Responsibility

Bribery and Corruption

- To comply with the US Foreign Corrupt Practices Act 1977 (FCPA) and the United Kingdom Bribery Act 2010 (UK Bribery Act), and other applicable-anti-bribery legislation
- To take no actions that might cause EthosEnergy to be in violation of the FCPA, the UK Bribery Act or other applicable anti-bribery legislation
- To refuse to tolerate, permit, or engage in any form of corruption, extortion, or bribery
- To refrain from making, offering, authorizing, or accepting any improper payments or anything of value (including kickbacks, bribes, or payoffs) conferred on any public or government official or individuals in the private sector for the purpose of influencing decision making
- To refrain from making, offering, authorizing, or accepting any 'facilitation,' 'greasing', or 'enabling' payments for the purpose of expediting or otherwise procuring a transaction

Conflicts of Interest

- To avoid conflicts of interest relating to your private activities or personal interests and your responsibilities and duties as an EthosEnergy Supplier
- To disclose potential or actual conflicts of interests in order to allow EthosEnergy to manage the situation and resolve it appropriately

Gifts and Hospitality

- To refrain from offering gifts or hospitality to EthosEnergy employees which could be perceived as an attempt to improperly influence a business transaction
- To refrain from offering gifts or hospitality to any third party which could be perceived as an attempt to improperly influence a business transaction

Confidentiality

- To protect the confidential information and intellectual property rights of EthosEnergy and other third parties
- To refrain from disclosing such information without express authorization
- To take steps to actively manage the protection and, maintenance of such confidential information including restricting access and disclosure
- To follow all applicable data privacy and information security laws and regulations
- To ensure personal data is handled confidentially and responsibly, effectively protected and used for legitimate purposes only
- To respect the privacy of others

6. Integrity

Legal Compliance

- To comply with the applicable laws, including international trade controls, sanctions, competition, and anti-money laundering laws and regulations
- To recognize that trade control laws affect the transmission of goods, services and technology across national borders — not just shipped products but also exchanges of information across national boundaries, including e-mail and web access
- To avoid transactions involving parties or activities suspected of any violation of United Nations Security Resolution 1540 regarding weapons proliferation
- To certify that materials supplied to EthosEnergy are free of “Conflict Minerals” and exercise due diligence consistent with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- To issue accurate invoices fully descriptive of the underlying transactions

Ethics and Reporting

- To take no steps that are in conflict with maintaining, strengthening, and protecting the reputation and business ethics of all parties you deal with
- To ensure that you conduct all your business activities in an ethical manner
- To ensure that employees comply with all laws and regulations applicable to business activities in all countries in which you operate
- To promote a culture of equal opportunities and transparency, and promulgate a procedure for raising concerns
- To report any concerns of non-compliance to this Global Supplier Code of Conduct to EthosEnergy’s Business Ethics Helpline or web based reporting system (Refer to Appendix 1)

7. Global supplier code of conduct receipt & acknowledgement

EthosEnergy reserves the right, at its discretion, to amend this Global Supplier Code of Conduct.

EthosEnergy reserves the right, at its discretion, to audit or inspect our suppliers' records and facilities as applicable and permitted by law to ensure compliance with this Global Supplier Code of Conduct. In the event of an audit or inspection, EthosEnergy expects its suppliers to cooperate fully.

Note: This Global Supplier Code of Conduct and the EthosEnergy Business Ethics Policy contain general requirements applicable to all suppliers. EthosEnergy expects suppliers to act not only in accordance with the specific provisions of this Global Supplier Code of Conduct and the EthosEnergy Business Ethics Policy, but also in accordance with the spirit of this Global Supplier Code of Conduct and EthosEnergy Business Ethics Policy. In the event there are any inconsistencies between this Global Supplier Code of Conduct and any other provision of a current and valid agreement, contract, or policy, suppliers must act in accordance with whichever provision is stricter.

By signing below, I hereby acknowledge that I have fully read, understand, and that our Company will abide by the above.

Company:

Name:

Position:

Date:



SAFETY



**SERVICE
EXCELLENCE**



PEOPLE



**FINANCIAL
RESPONSIBILITY**



INTEGRITY

8. Appendix 1: Business ethics helpline contact details

To confidentially report any concerns or non-compliance to this Global Supplier Code of Conduct, anonymously call the Helpline Contact Number below, available 24 hours a day, 7 days a week, in over 100 different languages. The call will not be recorded.

Location	Helpline contact
Argentina	0800 345 8186
Australia	1800 465 304
Brunei	801 4263
Canada	833 316 0542
China	400 120 4163
Colombia	01 800 5189486
France	0 805 08 04 84
Germany	0800 7824453
Ghana	0-2424-26-004, then 844-919-1921
Indonesia	007 803 321 2309
Italy (includes San Marino, Vatican City)	800 974 725
Kazakhstan	8 800 555 70 81
Mexico	800 099 1719
Oman	800 70710
Poland	0 0 800 4911983
Qatar	Web based reporting system at ethosenergy.ethicspoint.com
Ireland	1800 903 322
Israel	1 809 349 282
Saudi Arabia	800 850 0363
South Africa	080 099 0053
Spain	900 997 933
Sweden	020 88 85 73
Switzerland	0800 564 886
Thailand	1 800 013 238
Turkey	0811 288 0001 at the English prompt 844 919 1921
Netherlands	0800 0226791
United Arab Emirates	800 0321050
United Kingdom & Northern Ireland	0800 069 8042
United States	844 919 1921

General helpline for all other countries:

For all other countries, please use the web based reporting system at ethosenergy.ethicspoint.com.