



# Supplier Code of Conduct

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## Authorisation

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Verified and authorised by: Richard Pennington



Chief Executive Officer (CEO)

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## 1. Introduction

Operating with integrity governs our approach and therefore our aspiration to be recognised by our stakeholders as an organisation which is a responsible corporate citizen in all our relationships.

We expect our suppliers, vendors, consultants, and subcontractors, jointly referred to as "Business Partners", to share our commitments and approach too. We have therefore drawn up these guidelines, related to our business expectations associated with all our suppliers and Business Partners.

We expect them to adhere to the guidelines and to confirm in writing that they will adhere to this code and that they also expect these requirements of their supply chain, including subcontractors.

By working collaboratively, we believe we can jointly have a positive impact on society and the most effective and ethical manner to do business together.

## 2. Scope of the Supplier Code of Conduct

For the purposes of this Supplier Code of Conduct, Business Partners who we expect to comply with our standards set forth herein include suppliers, vendors, consultants and subcontractors.

## 3. Laws and Regulations

For us, compliance with all applicable laws and regulations is a matter of course. We also expect this from our Business Partners. This is the only way to ensure a trust-based and long-term business relationship.

All Business Partners are aware of the fundamental laws, regulations and guidelines that are relevant for their respective activities for, together with, or on behalf of FourNet.

In individual countries, business sectors or markets, stricter regulations may exist than those described in this Supplier Code of Conduct. In such cases, the stricter rules shall apply.

Our Business Partners follow up on all reports of violations of applicable laws. Violations will be stopped, and appropriate action taken.

Our Business Partners comply with foreign trade regulations. Appropriate measures must be taken to ensure that transactions with third parties do not violate applicable economic embargoes or regulations on trade, import and export controls or to combat the financing of terrorism.

## 4. Underage Labour

It is expected that our suppliers and Business Partners do not tolerate child labour as defined by ILO Convention 138 or ILO Convention 182, and applicable national laws.

Suppliers and Business Partners shall ensure that no underage labour has been used in the production or distribution of goods and services to FourNet. A child is any person under the minimum employment age according to the laws of the country where the product (or parts of), or services are sourced from, or in the absence of law, under the minimum age for completed mandatory education.

Accordingly, children under the employment age of 18 may not be employed in any of the worst forms of child labour. This includes any work which, by its nature or the circumstances under which it is performed, is likely to be harmful to the health, safety or morals of children.

## 5. Forced Labour

Suppliers and Business Partners will not use or tolerate in their supply chain any form of slavery, servitude, indentured, bonded, involuntary prison, military or compulsory labour or any form of human trafficking, or any other form of forced labour set forth by ILO Convention 29. All work must be conducted voluntarily and without threat of any penalty or sanctions.

No employee Government issued identification, passports or work permits will be retained by the supplier as a condition of employment.

Workers' rights to leave the workplace after their shift or to terminate their employment after reasonable notice and receive owed salary must be recognised by the supplier. This applies to local or migrant employees.

Our suppliers and Business Partners cannot tolerate any form of slavery or practices similar to slavery, serfdom or other forms of domination or oppression, e.g. through extreme economic or sexual exploitation and humiliation in the environment of the place of work.

Suppliers and Business Partners are asked to report to FourNet any incidents of slavery or human trafficking found in its business or supply chain.

## 6. Freedom of Association

Suppliers shall respect the rights of workers to associate or not to associate with any group, as permitted by, and in accordance with all applicable local and national laws, and freedom of association and collective bargaining. Suppliers shall not interfere with, or discriminate against, workers choosing to belong to them.

Where the right to freedom of association and collective bargaining is restricted under national law, suppliers will facilitate, not hinder, alternative means of independent and free association and bargaining.

We expect our suppliers and Business Partners to instruct and monitor their own and commissioned private and public security staff to ensure that the right to freedom of association is not violated.

## 7. Discrimination

Suppliers and Business Partners are expected to offer an inclusive and diverse work environment, that is encouraged, with equal opportunities for all workers.

All employees must be treated fairly and not discriminated against in any form of employment, or employment applications, based on the grounds of national or social origin, race, health status, gender, pregnancy or parenthood, marital status, age, disability, religion or belief, political opinion, sexual orientation or gender identity or any other grounds covered by a discrimination prohibition, during any recruitment or employment activities.

Suppliers must commit to treating their employees with dignity and respect, free of any harassment or threat of harassment. Any forms or threats of harassment, either physical, mental, sexual or verbal, must be prohibited and not tolerated. Abuse of power, intimidation, antisemitism and religious intolerance must also be prohibited.

We expect that our suppliers and Business Partners instruct and monitor their own and commissioned private and public security staff to ensure that no cruel, inhuman or degrading treatment occurs.

## 8. Fair Working Conditions

Suppliers and Business Partners are expected to respect and comply with regulations to ensure that fair working conditions are in place, and that they allow their employees to raise issues openly and without fear of reprisals.

It is also expected that their employees and associated contractors are paid wages and benefits in line with the legal requirements of their local country or region, and that are deemed reasonable and fair. It is expected that in determining the wage, at least the minimum wage provisions of the applicable law shall be followed and criteria such as local cost of living shall be considered and without unauthorised deductions.

We expect that our suppliers and Business Partners do not tolerate intimidation and/or retaliation attempts against employees who report actual or suspected misconduct in good faith. They should also give their employees the opportunity to report potential compliance violations confidentially. In line with their right to the freedom of expression.

## 9. Working hours

Suppliers must ensure working hours comply with national laws and standards and should not expect workers to work (including overtime) in excess of hours set out in relevant working time legislation or other national legal limits, unless an opt out has been chosen by the employee with appropriate supporting written evidence in place that can be evidenced and audited, on request.

It is also expected that suppliers and Business Partners prevent excessive physical and mental fatigue of employees by observing appropriate measures regarding working hours and rest breaks.

## 10. Health, Occupational Safety and Wellbeing

Suppliers must provide safe and clean conditions for workers at sites of working and residential facilities. Clear procedures must be in place to ensure regulated occupational health, safety and wellbeing standards are adhered to and that employees are adequately trained and instructed regarding protective measures. We also expect that adequate risk assessments are conducted regularly to ensure that a consistently safe environment is in place.

We expect that our suppliers and Business Partners instruct and monitor their own and commissioned private and public security staff to ensure that their staff are kept safe, and their right to having a safe working environment is not violated.

## 11. Environment

Suppliers must have clear procedures in place to ensure direct and indirect environmental impacts associated with the goods and services are understood, measured and managed. Suppliers must comply with FourNet's Environment Policy (ref. 002 20).

## 12. Business Integrity

Suppliers and Business Partners shall not engage in any form of bribery or corruption – whether by public officials or in business dealings – shall not make contributions, as invitations or in connection with advertising measures, donations and sponsoring, only to the extent permitted by law, or undertake any action that contravenes FourNet's Anti-Bribery and Corruption Policy.

We expect that our suppliers and Business Partners have in place systems to prevent, detect, investigate and respond to allegations or incidents of corruption and bribery.

Suppliers and Business Partners shall conduct their business, recordkeeping and financial reporting in an orderly and transparent manner. Business transactions, assets and liabilities are recorded and documented according to legal requirements. No false or misleading entries may be made in all of the supplier's or Business Partner's business operations. No false or misleading entries may be made on documents that are relevant for financial accounting. Any form of balance sheet manipulation is prohibited.

We also expect our suppliers and Business Partners to comply with all applicable tax regulations, and fulfil their tax obligations accordingly, which are legally required.

Suppliers and Business Partners must comply with insider trading laws. It is prohibited by law to use insider information when trading in securities or other tradable financial instruments and disclosing insider information to third parties for such purposes.

Insider information is information about circumstances that are not known publicly and which, if they became known publicly, could significantly influence the price of securities or similar financial instruments or their market. Examples of such circumstances may include, but are not limited to, profit increases and decreases, sizeable orders, acquisitions and mergers, significant new products or solutions or changes in management structures.



## 13. Conflicts of Interest

Suppliers and Business Partners should disclose potential or actual conflicts of interest and resolve them as quickly as possible. Any suppliers or Business Partners who are affected by a potential or actual conflict of interest in their activities relating to FourNet are required to disclose and resolve it immediately.

Suppliers and Business Partners are expected to protect confidential information from unauthorised disclosure and misuse and protect FourNet's reputation in public statements.

Confidential information is non-public information intended only for restricted groups or persons and not for internal processing or external publication.

Suppliers and Business Partners should ensure that confidential information and data are carefully stored, not forwarded or made accessible to unauthorised persons, and used exclusively for the agreed purposes.

Suppliers and Business Partners should not discuss confidential information in public, via social media or disclose information about the company or its customers to third parties without authorisation. Any breach of these requirements constitutes a breach of confidentiality obligations and may constitute antitrust violations or breach any confidentiality agreements in place.

## 14. Protection of Business Assets

Suppliers and Business Partners shall not engage in any form of fraud, or other offences that are damaging to the assets (e.g. embezzlement, theft, misappropriation, tax evasion or money laundering) regardless of whether FourNet's corporate assets or the assets of third parties are damaged as a result.

Suppliers and Business Partners shall respect and protect intellectual property of all kinds. Intellectual property is defined as all products of intellectual work, regardless of their commercial value.

These include, but are not limited to, literary and journalistic works, music, films, television programs, graphic works as well as software and their components.

Intellectual property is protected by law (e.g. by copyright, trademark or design or patent laws) as trade secrets or expertise.

Protected intellectual property infringements include, for example, the performance, distribution or exhibition of copyrighted works without appropriate permission and the unauthorized reproduction or distribution of copies of intellectual property, whether in physical or digital form.

Suppliers and Business Partners are expected to comply with applicable laws and regulations when personal data and information are collected, stored, processed or transferred.

When collecting, storing, processing or transmitting personal data (e.g. name, address, telephone number, date of birth, health information) of employees, customers or other third parties, our suppliers and Business Partners take the utmost care and observe strict confidentiality as well as compliance with applicable laws and regulations.

Our suppliers and Business Partners may need to use information provided to them by FourNet solely to fulfil their obligations and duties expected of them as part of our supplier and business duties. It is therefore expected that they protect this information from internal and external misuse and take all necessary measures to protect the safety and integrity of access to any information and IT systems, at all times.

Data is processed and IT systems used as part of daily operational processes and procedures. If our supplier and Business Partners have access to passwords, processes, approved technologies and licensed software, it is expected that appropriate safeguards and training take place, to protect and preserve the confidentiality, integrity and availability of these systems, at all times.



## 15. Fair Competition

Suppliers and Business Partners must comply with applicable antitrust and competition laws and commit to fair and unimpaired competition. We expect our suppliers and Business Partners to refrain from restrictive agreements with competitors, suppliers, distributors or trading companies and customers, as well as from practices that restrict competition. These include, for example price-fixing agreements with competitors, sharing customers or sales territories between competitors, anti-competitive boycotts and the unlawful exchange of competition-sensitive information with competitors as well as other unfair competition methods.

We expect that our suppliers and Business Partners have in place systems to prevent, detect, investigate and respond to allegations or incidents of or relating to restrictive practices.

## 16. Discipline and Grievances

Suppliers must provide a grievance mechanism for workers and their organisations to enable workers to anonymously raise workplace concerns. The mechanism must be transparent, and set out clearly how grievances will be assessed and feedback provided. Workers and their representatives must be informed clearly how the scheme operates and its scope, and that it is equally accessible to all workers.

Disciplinary procedures shall be clearly documented, communicated and easily accessible to all workers. All disciplinary matters shall be recorded including evidence that the worker knew and understood what he/she was accused of and given the right to trade union or other appropriate representation at disciplinary meetings which may lead to significant disciplinary penalties or dismissal.

## 17. Compliance with Code

Suppliers must be able to demonstrate compliance with FourNet's Supplier Code of Conduct. This includes documented evidence and the right of FourNet or a designated firm to conduct audits. These audits can be, but are not limited to include, facility inspections, review of supplier records business practices and conducting employee interviews.

## 18. Reporting concerns

In relation to 2. to 13. Above, suppliers are invited to report any area of concern to FourNet. Please request a copy of our Whistleblowing policy for further information and advice on how to report concerns anonymously.

## 18. Supplier Acknowledgement

I have read FourNet's Supplier Code of Conduct and on behalf of <Supplier Company Name> we agree to comply with this code of practice, during the length of our business relationship.

Signed on behalf of <Supplier Name>

Name  
Job Title  
Date