

Datamars Supplier Code of Conduct

1 Purpose

Datamars' purpose as a company is to make a measurable difference. Our vision is to be world leaders in harnessing the power of data to measurably and sustainably improve productivity and quality of life.

Our success on this journey is not only dependent on pursuing the right strategy in the right way but also on the trust, dedication and integrity of all our suppliers.

We act with integrity and independence by holding ourselves and each other accountable to be ethical and reliable in all we do, by following rules and regulations where we live, work and do business – as well as following our own Datamars policies, guidelines and procedures.

In Datamars, we also expect our suppliers to conduct their business lawfully and with integrity, and to extend these behaviors and standards to their own suppliers.

This Supplier Code of Conduct (hereinafter the “**SCoC**”) defines the behaviors and minimum standards that we expect from our suppliers, in accordance with Datamars' own principles. Compliance with this SCoC is a mandatory condition for suppliers to establish and maintain a business relationship with Datamars.

Under this SCoC, we may develop certain policies, procedures and instructions to implement and enforce the obligations undertaken, and to align with different local laws and regulations applicable to Datamars.

2 Scope

The current SCoC applies to all Datamars existing and potential manufacturers and suppliers that take part in the purchasing, manufacturing and finishing processes and supplying goods and/or services to Datamars.

Datamars suppliers must operate in full compliance with the applicable laws, rules, regulations of the countries, states and localities in which they operate or where they provide products and/or services to Datamars and/or for Datamars, including but not limited to environmental, health and safety laws and regulations, and corporate standards. Although there may be different legal, regulatory and cultural environments applicable to such suppliers, Datamars suppliers must comply with this SCoC for the entirety of their agreements with Datamars or any of the Datamars group entities. This SCoC does not replace the legislation in these jurisdictions and must be observed in addition to those laws.

3 Expected Behaviours and Minimum Standards

3.1 Governance

- **Management systems:** suppliers shall implement, apply and maintain efficient management systems utilizing the internationally recognized standards in accordance with their size and industry, to ensure compliance with this SCoC and with relevant requirements and legislation, and risk management.
- **Privacy, data protection and confidentiality:** suppliers shall adhere and comply with all cybersecurity, privacy and data protection laws and regulations concerning the processing of personal and sensitive data of their business partners, clients and employees and shall ensure

that such data is appropriately protected. Suppliers should evaluate organisational and technical measures for this, with monitor and improvement of their cybersecurity, privacy and data protection as far as practicable. Datamars should be informed at the earliest possible time of any breaches which affect the data you hold about our business, our employees, our clients or any other information of relevance to Datamars. Suppliers shall maintain the integrity and confidentiality of Datamars' information and shall use it only for the purposes in which it was provided.

- **Conflict of interest:** suppliers must avoid actual, potential or perceived conflicts of interest with Datamars and its employees. Conflict of interest typically occurs when personal interests interfere with or appear to interfere with a supplier's ability to perform the services without prejudice. In the event that they do occur, the supplier must disclose such a conflict, so that appropriate steps can be taken to manage the situation.
- **Conflict minerals and materials:** suppliers shall comply with all applicable laws and associated due diligence obligations in connection with the procurement of minerals and materials from conflict regions and risk areas that contribute to human rights violations, corruption, the financing of armed groups or similar negative impacts. Suppliers must exercise due diligence on the source and chain of custody of conflict minerals and materials in their supply chain, applying a nationally and internationally recognised supply chain due diligence standards.
- **Traceability of materials and production:** suppliers shall be able to disclose the country of origin of primary materials used from external or third-party suppliers. Therefore, suppliers might be required to regularly investigate the country of origin of primary materials in order to establish their origin. In the case the supplier discovers that a material comes from a conflict area, this should be promptly notified to Datamars, and Datamars may request the supplier's complete supply chain map in order to facilitate risk assessment and compliance of its supply chain.
- **Bribery and corruption:** suppliers shall not tolerate any form of bribery, corruption or any other form of unlawful business practice in any of their operations. Datamars encourages its suppliers to incorporate robust mechanisms to ensure their employees, business partners or clients do not take part in such activities and comply with applicable anti-bribery and anti-corruption laws and regulations.
- **Money laundering:** suppliers must not attempt or participate in any form of money laundering and should incorporate measures to prevent exposure of their financial transaction to it. Suppliers shall adhere to all applicable laws and regulations concerning anti-money laundering.
- **Competition law:** suppliers undertake to operate in accordance with the principle of free and fair competition and shall comply with the applicable competition law. In particular, suppliers shall not conclude price fixing, production quantity, or market or client-sharing agreements with competitors, nor fix retail prices or enter into agreements regarding complete market exclusivity.
- **Compliance with international trade regulations:** suppliers shall comply with relevant international trade sanctions regimes, export control regulations, and other international trade laws and regulations. They shall ensure that their goods and services meet the applicable statutory and regulatory requirements with regard to export and import processes (import, export and transit of goods), including sanctions and embargoes.
- **Intellectual Property:** suppliers shall respect and safeguard all Datamars intellectual property rights and shall maintain Datamars property information solely for the purposes specified by Datamars.

- **Gifts and donations:** suppliers shall not offer, grant, request or accept any gifts or donations that could be considered unreasonable or inappropriate or intended to influence in any way Datamars' business decisions.

3.2 Social

- **Fair wages and working conditions:** we expect suppliers to provide their workforce with at least the minimum wages set by national standards, reasonable working hours, sufficient rest periods, and safe working conditions. This should also include the adherence to national laws and international best practice regarding paid sick leave, annual leave and parental leave.
- **Health and Safety (H&S):** suppliers shall ensure the physical and mental health of their employees by providing a safe, secure and healthy working environment. Suppliers shall comply with all necessary H&S guidance and training, for which we encourage the incorporation of a H&S management system.
- **Human rights:** the human rights of all employees shall be protected, and this should be formalised through suitably implemented policies. Suppliers must prevent, address and remedy human rights abuses of any kind within and/or related to their operations, as defined by the United Nations Guiding Principles on Business and Human Rights¹.
- **Harassment and discrimination:** suppliers should not tolerate any form of discrimination nor harassment within their operations and should have robust grievance mechanism to denounce and address such conducts.
- **Child labour, forced labour and modern slavery:** Datamars has zero tolerance to the use of child labour or underage labour and therefore suppliers undertake not to, under any circumstance, have children within their workforce, forced labour or victims of human trafficking. The term "child" means any person employed under the age of 15, or the applicable minimum legal age for employment in the relevant jurisdiction, whichever is higher. Suppliers shall comply with the International Labour Organization (ILO) standards as well as applicable local legal requirements.
- **Human rights:** the human rights of all employees shall be protected and this should be formalised through suitably implemented policies (see Ethics section below).
- **Labour unions:** suppliers should respect the right of their employees to participate in unions and associations, in accordance with relevant legislation, with no negative retaliation.
- **Diversity, equity and inclusion:** suppliers should provide a diverse, equitable and inclusive work environment, where employees and prospective employees are treated with respect, fairly and equally, regardless of their gender, race, colour, age, disability, sexual orientation, ethnic origin and religion. These principles should also be incorporated in the suppliers' hiring process.

3.3 Environment

In Datamars we expect our suppliers to minimize their negative impact on the environment. This should be applied to operations, sourcing, manufacturing and distribution of products and/or services.

¹ [UN Guiding Principles on Business and Human Rights](#)

- **Environment protection:** suppliers should undertake efforts to protect the environment, in particular, water and land resources, and biodiversity.
- **Use of resources:** suppliers should use resources in an energy-efficient and environmentally friendly way.
- **Compliance:** suppliers should ensure that they obtain and maintain all necessary environmental permits, as well as ensure that they comply with all relevant national and international environmental legislation and industry standards. For this, we encourage the incorporation of an Environmental Management System.
- **GHG emissions:** we encourage suppliers to consider starting their journey on Greenhouse Gas (GHG) emissions accounting and reduction if they have not started yet. Within Datamars, we have set out a pathway to Net Zero in alignment with Science Based Targets guidance and we will progressively need the collaboration of our partners in this respect.
- **Land contamination and resource management:** suppliers should proactively manage their own waste streams, minimizing waste to landfill and maximizing the reuse and recycling of materials within and outside their own operations. We encourage the incorporation of an Environmental Management System with employee training programmes to support this.
- **Hazardous substances:** suppliers must comply with legal regulations and requirements regarding the identification, transport, handling, storage and disposal of hazardous substances. The inventory of hazardous substances with updated material safety data sheets (MSDS) must be maintained and provided for review upon request. Suppliers must prohibit the use of substances subject to national or international bans due to their adverse effects on humans or the environment. Hazardous chemicals and other materials must be identified and labelled in such a way that they can be used and disposed of safely.

4 Monitoring and inspections

Datamars is committed to this SCoC, for which we conduct periodic supplier monitoring where compliance with the present may be reviewed. To this end, Datamars reserves the right, whether through its own employees or third parties, to conduct audits, engagement and other monitoring activities to verify the compliance of suppliers to this SCoC.

For these purposes, suppliers shall provide the required means and the appropriate access to facilities/buildings and documentation required to ensure this verification. Suppliers shall maintain all documentation available on site, ready for consultation, including accurate books and records, which may be needed to verify compliance with this SCoC and the applicable laws. Where the documentation is not available on-site, suppliers shall facilitate and expedite its collection during the audit.

5 Violation to this SCoC

5.1 Breaches Notification

We expect our suppliers to immediately communicate any potential or effective failure to comply with the SCoC, laws, regulations or any contractual agreements with Datamars. This includes violations by any employee, adviser, partner, agent or any other representative acting on behalf of either the Supplier or Datamars.

Reports can be made through the www.datamars.com web page directly to the Datamars Group Compliance Officer, emailed directly to GroupComplianceOfficer@datamars.com or through an independent web-based channel, the 'Datamars Integrity Platform' (<https://datamars.integrityplatform.org/>).

5.2 Contract Termination

Datamars may conduct an investigation on violation to the SCoC at any time.

We will not accept any justification or excuse for breaking this SCoC , whatever the reason – whether for profit, convenience, competitive advantage or because a business partner or someone else asked for it.

Should non-compliance with the SCoC be ascertained, Datamars reserves the right to immediately terminate its business relationship with the supplier or ask the supplier to engage in corrective actions within a reasonable agreed timeframe. Datamars reserves the right to terminate its business relationship with the Supplier for any unjustified delay and/or failure in the implementation of corrective actions within the agreed timeframe. Notwithstanding the above-mentioned measures, Datamars reserves the right to act and apply further measures as specifically provided for in the contract with the supplier.

5.3 Datamars Reporting

Suppliers shall comply with all local, national and international legislation applicable to their jurisdictions.

When Datamars determines that any international, national and/or local laws have been broken, we will not hesitate to report suppliers to the relevant authority.

6 Subcontractors

We expect our suppliers to support our commitment to fully comply with this SCoC through the development and implementation of their own code of conduct, relevant policies and risk-based due diligence process for their supply chains. Suppliers, in case of use of subcontractors, shall remain jointly and severally liable with the latter towards Datamars for the correct execution of the activities entrusted to them and for the observance of the provisions of this SCoC whose provisions shall be recalled in the relevant agreement to be entered into by the supplier and the subcontractor. We encourage our suppliers to embed the consideration of environmental, social and governance factors when engaging with their subcontractors.