Corporate Policy

Supplier Code of Conduct

Owner Procurement & Supplier Management Function

Last updated 17 October 2024

Overview

At Indue, we are committed to conducting our business with integrity, fairness, and in compliance with all applicable laws and regulations. We expect our Suppliers to uphold similar standards. This Supplier Code of Conduct outlines the principles and ethical standards we require from our Suppliers.

1. Compliance with Laws and Regulations

Suppliers must comply with all applicable laws, regulations, and standards in the countries in which they operate, as well as UN Global Compact, UN Universal Declaration of Human Rights, and International Labor Organization (ILO) standards. This includes, but is not limited to, laws and regulations related to labour, health and safety, environmental protection, and anticorruption.

2. Modern Slavery and Labor Practices

Indue recognises that we have an obligation to minimise incidents of slavery practices and human trafficking in our processes and supply chains. We are committed to acting ethically and taking steps to ensure that there is no modern slavery in our business practices, operations and supply chains. Modern Slavery is a crime and a violation of human rights and includes trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage and deceptive recruiting for labour or services. Suppliers are required to provide effective grievance procedures for raising workplace concerns, including harassment and discrimination. Refer to Indue's Modern Slavery Statement.

Suppliers must also comply with the following labour practices:

- Non-Discrimination: Suppliers shall not discriminate in hiring, compensation, access to training, promotion, termination, or retirement based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status.
- Fair Treatment: Suppliers must treat all employees with dignity and respect. There shall be
 no harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal
 punishment, mental or physical coercion, or verbal abuse.



- Wages and Benefits: Suppliers must pay workers at least the minimum wage required by law and provide all legally mandated benefits. Overtime work should be compensated at a premium rate.
- Freedom of Association: Suppliers must respect the rights of workers to associate freely, join or not join labour unions, seek representation, and join workers' councils in accordance with local laws.

3. Health and Safety

Suppliers must provide a safe and healthy work environment for all employees, as well as compliance with local health and safety laws and regulations. Suppliers must take proactive measures to prevent workplace hazards.

4. Diversity and Inclusion

Indue values diversity and inclusion within its supply chain. This includes differences that relate to gender, age, cultural background, disability, religion and sexual orientation, as well as differences in background and life experience and interpersonal and problem-solving skills. We encourage our Suppliers to promote and increase Supplier diversity within their organisation and supply chain by seeking equitable, mutually beneficial opportunities with a broad range of businesses.

5. Environmental Stewardship

Suppliers must comply with all applicable environmental laws and regulations. They should strive to minimise their environmental impact through environmentally conscious practices, responsible waste management, efficient use of resources, and reduction of emissions and pollutants. Indue encourage suppliers to track, document, and disclose their greenhouse gas emissions.

6. Anti-Corruption

Suppliers must not engage in any form of corruption, extortion, embezzlement, or bribery. They should maintain transparency in their business dealings and keep accurate records to demonstrate compliance with legal and ethical standards. Each Supplier should have a code which includes detailed guidelines on anti-corruption, extortion, embezzlement, and bribery. Suppliers should maintain transparency in business dealings and implement compliance monitoring, record-keeping, and enforcement procedures. Refer to Indue's <a href="https://www.whistle.ni.gov/whis

7. Information Security

The information that Indue collects, uses, accesses and stores is sensitive and valuable. Protection of this information and the privacy of our customers is of the utmost importance to Indue and its stakeholders. Suppliers must protect the confidentiality of all sensitive information related to Indue



and its clients. They must implement appropriate data protection measures to safeguard personal and proprietary information against unauthorized access, use, or disclosure. Suppliers are required to report any actual or suspected security incidents or data breaches immediately. Refer to Indue's Privacy-Policy.

8. Conflict of Interest

A conflict of interest arises when a Supplier's personal, financial, or other interests could compromise or be perceived to compromise the Supplier's judgment, decisions, or actions in their relationship with Indue. This includes situations where a Supplier's actions could unfairly benefit them, their employees, family members, or associates at the expense of Indue's interests or the integrity of the business relationship. Suppliers must avoid any circumstances that could create, or appear to create, a conflict of interest. All potential conflicts of interest must be disclosed to Indue immediately, and appropriate steps must be taken to manage or eliminate such conflicts.

9. Ethical Business Practices

Suppliers must engage in ethical conduct, fair competition, ensure advertising is truthful, and respect intellectual property rights at all times. We encourage Suppliers to adopt ethical trading initiatives and adhere to citizenship coalition standards to promote responsible business conduct.

10. Monitoring and Compliance

In the interests of ensuring a shared commitment to the principles of this Code, Indue will annually request the Supplier to attest that they comply with this Code and provide evidence. Indue reserves the right to monitor and audit Suppliers to ensure compliance with this Code. Suppliers are expected to provide reasonable assistance and access to relevant information during such audits.

Where the Supplier identifies, at any time, that it is unable to meet the expectations of this Code, the Supplier should notify Indue of any shortcomings and work with Indue to remedy identified shortcomings.

