

# **CODE OF CONDUCT FOR SUPPLIERS**

## **Preface**

iC Consult is committed to respecting the highest standards of labor and human rights, environmental protection, and ethical conduct. iC Consult's suppliers are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and be environmentally responsible. iC Consult requires its suppliers to operate in accordance with the principles and requirements, as laid out in this Supplier Code of Conduct and in full compliance with all applicable laws and regulation.

iC Consult reserves the right to modify the requirements of this Supplier Code of Conduct due to changes in the compliance program. In this case, iC Consult expects the Supplier to accept such reasonable changes.

This Supplier Code of Conduct applies to all Suppliers and Business Partners of iC Consult.

## **1 Laws and Regulation**

- Supplier must comply with the laws and regulation of the applicable jurisdictions.

## **2 Financial Responsibility**

- Supplier must maintain accurate, complete, and transparent financial records in compliance with applicable accounting and financial reporting standards.
- Supplier shall implement checks and measures to prevent fraud, corruption, and financial mismanagement.
- Supplier shall conduct regular audits to ensure financial integrity and compliance with internal and external regulations.

## **3 Fair Competition, Antitrust and Intellectual Property Rights**

- Supplier shall act in accordance with national and international competition law and not engage in price fixing, market or customer allocation, market sharing or bid rigging with competitors.
- Supplier shall respect the intellectual property rights of others.

## **4 Conflicts of Interest**

- Supplier shall avoid all conflicts of interest that may adversely affect business relationships.

## **5 Disclosure of Information**

- Supplier shall provide clear, truthful, and timely disclosures of information relevant to business practices, financial performance, and compliance with sustainability commitments.
- Supplier shall make information accessible to all relevant stakeholders, including regulatory authorities and the public as appropriate.
- Supplier shall protect sensitive information while complying with disclosure requirements.

## **6 Financial responsibility (Accurate Records)**

- Supplier shall ensure that all financial records are accurate, complete and maintained in accordance with legal requirements and accepted accounting standards.

## **7 Fundamental Human Rights of Employees**

- Supplier shall promote equal opportunities and treatment for its employees regardless of, including but not limited to, color, race, nationality, social background, disability, sexual orientation, political or religious beliefs, gender, or age.
- Supplier shall respect the personal dignity, privacy, and rights of every individual.
- Supplier shall refuse to employ or allow anyone to work against their will.
- Supplier shall not tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment, or discrimination.

- Supplier shall prohibit behavior, including gestures, language and physical contact that is sexual, coercive, threatening, abusive or exploitative.
- Supplier shall recognize the right of workers to free association and neither favor nor discriminate against members of workers' organizations or trade unions.

## **8 Health and Safety of Employees**

- Supplier shall take responsibility for the health and safety of its employees.
- Supplier shall control hazards and take the best possible precautions against accidents and occupational diseases.
- Supplier shall provide training and ensure that employees are trained in health and safety matters.
- Supplier shall provide a means for employees to raise concerns without the fear of retaliation through e.g., a whistleblowing system.
- Supplier shall establish or apply an appropriate occupational health and safety management system.

## **9 Prohibition of Child Labor**

- Supplier shall not employ workers under the age of 15 or, in countries subject to the developing country exception of ILO Convention 138, workers under the age of 14.

## **10 Prohibition of Trafficking in Human Beings**

- Supplier shall reject practices of human trafficking and strictly avoid any business activities that could be even remotely linked to the consequences of such practices.

## **11 Prohibition of Forced Labor**

- The principle of freely chosen employment is a foundation of moral and sustainable business. For this reason, Supplier shall reject forced labor and ensure that its own respective suppliers, who are part of iC Consult's supply chain, adhere to the same principles.

## **12 Freedom of Association and Collective Bargaining**

- Supplier shall comply with applicable law regarding the freedom of association of their employees and refrain from any restriction or suppression of employee representation activities.
- Supplier shall provide its workers with the right to freedom of association and, in addition, appropriate engagement in collective bargaining. This includes, that workers who engage in worker representation activities shall not be discriminated against.

## **13 Adequate Wages and Benefits**

- Supplier shall ensure adequate remuneration and the applicable national statutory minimum wage.
- Supplier shall comply with applicable laws relating to working conditions, working hours, days of leave and the maximum number of working hours set out in applicable laws.

## **14 Prohibition of Corruption and Bribery**

- Supplier shall not tolerate any form of corruption or bribery nor engage in it, directly or indirectly.
- Supplier shall not grant, offer, or promise anything of value to a government official or a counterparty in the private sector to influence official action or obtain an improper advantage.

## 15 Counterfeit Parts

- Supplier shall prohibit the use, supply, or sale of counterfeit parts in all business operations..
- Supplier shall implement robust verification and quality control processes to ensure the authenticity of parts and materials.
- Supplier shall maintain traceability of parts and materials to their original manufacturers.

## 16 Information Security and Privacy

- Supplier shall commit to protecting iC Consult information by utilizing an appropriate information security framework (such as ISO 27001, NIST) or equivalent measures that have been designed internally.
- Supplier shall ensure the protection of reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees.
- Supplier shall comply with privacy and information security laws and regulatory requirements when collecting, storing, processing, transmitting, and sharing personal information.

## 17 Environmental Protection

- Supplier shall act in accordance with applicable national and international legislation and standards on environmental protection.
- Supplier shall minimize environmental impact and continuously improve environmental protection and take appropriate measures to prevent waste.
- Supplier shall reduce greenhouse gas emissions through e.g., a move to renewable energy, improved energy efficiency, and minimized energy consumption.
- Supplier shall commit to biodiversity conservation and sustainable land use practices.
- Supplier shall prohibit deforestation and implement policies to reduce impacts on forests and natural habitats.
- Supplier shall establish or apply an appropriate environmental management system.
- Emissions of organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, or combustion by-products from operations shall be typed by Supplier, routinely monitored, verified and, if necessary, treated prior to their release.
- Supplier shall routinely monitor the exhaust gas cleaning system.
- Supplier shall promote good air quality and avoid negative impacts on air quality.
- Supplier shall implement processes to reuse and recycle where possible.
- Wastewater from operations, manufacturing processes and sanitation shall be typed, monitored, reviewed, and treated as necessary prior to discharge or disposal by Supplier.
- Supplier shall reduce water quality impacts to a minimum.
- Supplier shall prevent soil contamination through proper waste management and use of non-harmful materials.
- Supplier shall adopt a sustainable natural resource management, wastewater, and waste prevention approach.

- Supplier shall conduct comprehensive environmental impact assessments prior to initiating projects that affect land, water, or forest resources
- Supplier shall practice responsible chemical management.

## **18 Sourcing Raw Materials Responsibly and Dealing with Conflict Minerals**

- Supplier shall ensure that goods and materials supplied to iC Consult have not been obtained in an illegal or unethical manner.
- Supplier shall confirm the implementation of appropriate due diligence measures for the responsible sourcing of minerals to ensure compliance with relevant regulations.
- Supplier shall, in the case of production, purchase or trade of regulated conflict minerals (tantalum, tin, tungsten, gold or other minerals or their derivatives deemed to finance conflict) from the Democratic Republic of Congo (DRC) or its neighbors (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, Sudan, Tanzania, Uganda and Zambia), provide, upon request by iC Consult, its due diligence measures and related findings to exclude the possibility of being supplied with such minerals.

## **19 Land, Forest and Water Rights and Forced Eviction**

- Supplier shall respect legal and customary land, forest, and water rights of local communities and indigenous peoples.
- Supplier shall not engage in or support forced evictions without legal basis and proper compensation.

## **20 Noise Emissions**

- Supplier shall Implement measures to reduce noise emissions from operations..
- Supplier shall engage with local communities to address concerns about noise and implement mitigation strategies where necessary.

## **21 Use of Private or Public Security Forces**

- Supplier shall ensure that all security personnel, whether in-house or contracted, comply with the highest ethical standards and respect human rights.
- Supplier shall implement oversight mechanisms to monitor the actions of security forces and ensure accountability for misconduct.
- Supplier shall provide training for security personnel on human rights, the appropriate use of force, and ways to engage with communities.

## **22 Export Controls and Economic Sanctions**

- Suppliers must comply with all applicable export controls and economic sanctions
- Supplier must have policies and processes in place to ensure none of its businesses or employees engage in a prohibited transaction.

## **23 Supply Chain**

- Supplier shall make reasonable efforts to promote compliance with this Code of Conduct among its suppliers.
- Supplier shall comply with the principles of non-discrimination in the selection and treatment of suppliers.

## **24 Compliance with this Supplier Code of Conduct**

To ensure compliance with the Supplier Code of Conduct, iC Consult reviews its efforts in relation to the principles of this Code of Conduct as part of its discussions with suppliers. Any failure to comply with the principles contained in the Supplier Code of Conduct shall constitute a material breach of the Supplier's contractual obligations to iC Consult. In such a case, iC Consult reserves the right to take appropriate measures, including extraordinary termination of all contractual relationships between the supplier and iC Consult.