



# Supplier CODE OF CONDUCT

***Version 2.9***



## Document version control page

### Prepared By

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Version	Date	Reviewed by	Approved By	Owner
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### AELData Supplier Code of Conduct

#### Purpose and Scope

We at AELData have set high standards for the way we conduct business - in areas from corporate and social responsibility to sound business ethics, including compliance with all applicable laws and regulations. AELData presumes its suppliers to share this commitment and, therefore, has established this Supplier Code of Conduct. Although there may be different legal and cultural environments applicable to its suppliers, AELData suppliers must meet the following minimum requirements in order to do business with AELData:



In alignment with our values, we are committed to striking the right balance across shareholder groups, clients, employees and communities. Our organization, and all of our employees, have a duty to comply with applicable laws and regulations, and are expected to behave responsibly and ethically.

## **Business Integrity**

### **Compliance with Laws**

In all their activities, Suppliers must ensure they conduct business in compliance with the applicable laws, rules, and regulations of the jurisdictions in which they operate.

### **Conflicts of Interest**

In their relationship with our employees, Suppliers must not try to gain improper advantage or preferential treatment for other relationships they may have with us (for example, as a client).

### **Gifts and Entertainment**

Suppliers are expected to compete based on the merit of their products and services, not through gifts, entertainment or other business courtesies. Suppliers must not provide entertainment that could embarrass AELData or harm its reputation. Suppliers must never provide gifts or entertainment intended to improperly influence any person's business judgment or that might create the appearance of undue influence. It is never permissible to give currency as a gift.

### **Anti-bribery and Anti-Corruption**

Suppliers must not engage in any conduct that would put our organization at risk of violating anti-bribery laws.

### **Privacy and Information Security**

Suppliers must comply with AELData's published Privacy Policy, and must use information obtained through their relationship with us only for the purpose defined to them.

Suppliers must store information as agreed with AELData and have appropriate information security policies and procedures in place to secure access to our information. Suppliers must notify us promptly of actual or suspected privacy



breaches, security breaches, or losses of our information.

### **Business Resumption and Contingency Planning**

For some services performed by Suppliers, due to the significance for our businesses or the types of activities that may be involved, we expect that the Supplier's business continuity and disaster recovery plans are developed, maintained and tested in accordance with applicable regulatory, contractual and service level requirements.

### **Outsourcing and Subcontracting**

We recognize that outsourcing is a practice that Suppliers may use to promote innovation, fill resource gaps, and/or create operational efficiencies. We also recognize that Suppliers may need to use subcontractors in the performance of services. However, we expect Suppliers not to subcontract services they perform for us or outsource activities that directly impact the delivery of goods and services to us, without our prior written approval. In situations where approval is given, it is important for us to know the locations of where the work will be performed and the parties involved in the provision of the services.

In addition, Suppliers must monitor the outsourcing or subcontracting arrangement to ensure it complies with the Suppliers' contractual obligations and with this Code, and provide evidence of such monitoring upon request.

### **Respect and Diversity**

Suppliers must maintain workplaces characterized by professionalism, and respect for the dignity of every individual with whom their employees interact. Suppliers must respect the diversity of their employees, clients and others with whom they interact, including respect for differences such as gender, race, colour, age, disability, sexual orientation, ethnic origin and religion. Suppliers must not tolerate harassment, discrimination, violence, retaliation and other disrespectful and inappropriate behaviour. Suppliers must respect the dignity of their own employees and others, adhere to principles of diversity and maintain a respectful workplace. In no event shall Supplier's workers be subject to threats of violence, physical punishment, confinement, or other form of physical, sexual, psychological, or verbal harassment or abuse.

### **Discrimination, Harassment and Child Labour**

Suppliers must abide by applicable employment standards, labour, non-discrimination and human rights legislation. Where laws do not prohibit discrimination, or where they allow for differential treatment, we expect Suppliers to be committed to non-discrimination principles and not to operate in a way that differentiates unfairly.

Suppliers must be able to demonstrate that, in their workplaces:



- Child labour is not used.
- Suppliers will not use forced labor of any type, including bonded, indentured or involuntary prison labor.
- Discrimination and harassment are prohibited, including discrimination or harassment based on any characteristic protected by law.
- Employees are free to raise concerns and speak up without fear of reprisal.
- Appropriate and reasonable background screenings, including investigations for prior criminal activity, have been done to ensure the integrity and good character of the Supplier's Employees.
- Clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements.

### **Working Hours and Wages**

Suppliers shall not require workers to work more than the maximum hours of daily labor set by local laws. Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Employees should have the ability to earn fair wages, as determined by applicable local law.

Suppliers are fully responsible for the quality, performance, behavior, supervision and protection of their personnel.

### **Health and Safety**

AELData suppliers shall provide their employees with a safe and healthy working environment in order to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of the supplier. Suppliers shall, among other things, provide

- Occupational health and safety training;
- A system for injury and illness reporting;
- Medical treatment and/or compensation to injured/ill workers arising as a result of working for supplier;
- Machine safeguarding and other protective measures to prevent injuries/illnesses to workers;
- Clean and safe facilities.

### **Environment**

We expect Suppliers to work with us to promote environmental sustainability. Suppliers are to assist in reducing our environmental footprint, conduct business in an environmentally responsible way, and offer environmentally responsible products and services.

### **Documented Information's**

Suppliers must not destroy our documented information's that may be relevant to any pending or threatened legal or regulatory proceeding of which the Supplier



becomes aware. Suppliers must maintain adequate internal documented information's to ensure proper compliance with their obligations to us.

### **Code Compliance and Monitoring**

We expect Suppliers to comply with this Code. For some services, because of their significance for our business and the type of activities they involve, we may require a Supplier to periodically confirm in writing to our Vendor Manager, that they meet the requirements of this Code. In addition, we must be able to monitor and audit a Supplier's control environment.

Failure to comply with this Code may result in termination of a Supplier's relationship with us.