# **Supplier Code of Conduct**

aosphere is committed to maintaining high standards of corporate integrity, responsible sourcing, environmental sustainability and the safety of workers. This Supplier Code of Conduct sets out the minimum standards that we expect to be met by anyone that supplies products or services to aosphere (a Supplier).

We expect Suppliers to comply with this Code and to require their Representatives to comply with applicable provisions of this Code or meet substantially similar standards. Suppliers should make their Workers aware of the requirements of this Code and put in place appropriate systems and controls to ensure compliance.

#### In this Code:

**Worker** means any individual whom the Supplier employs, hires or engages, or otherwise uses to conduct its business.

**Representative** means the Supplier's suppliers, vendors, agents and subcontractors who are involved in aosphere's supply chain.

# Workforce and human rights

#### **Human rights**

The Supplier shall comply with all internationally recognised human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work from time to time in force in any part of its supply chain. Suppliers shall treat Workers with respect and dignity.

## Slavery, human trafficking and child labour

The Supplier shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force in any part of its supply chain. This includes, but is not limited to, not supporting or engaging or requiring any forced labour, child labour, bonded labour, indentured labour or prison labour.

## Freedom of association and collective bargaining

The Supplier shall respect, and shall not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

## Working environment

The Supplier shall provide a safe and hygienic working environment and comply with all applicable health and safety laws and regulations. This includes, but is not limited to, implementing procedures and safeguards to prevent workplace hazards and work-related accidents and injuries.



## **Employment law**

The Supplier must comply with all applicable wage and employment laws and regulations. Suppliers must comply with all applicable laws on eligibility to work, including in the case of the United States any requirements in federal, state or local law to verify the identity of new employees and their eligibility for employment in the United States.

# **Diversity and inclusion**

aosphere supports diversity, equity and inclusion and is an equal opportunities employer.

Suppliers shall not discriminate in hiring, compensation or any other employment practice based on race, ethnicity, gender, gender identity, sex, sexual orientation, religion, age, marital status, disability, union membership, political affiliation or any other protected characteristic.

## **Ethics**

## **Bribery and corruption**

The Supplier shall comply with all applicable laws, statutes, codes and regulations relating to the prevention of bribery, corruption and tax evasion (including but not limited to the Bribery Act 2010 and the Criminal Finances Act 2017).

The Supplier shall not accept, offer, promise, pay, permit or authorise bribes, facilitation payments, kickbacks, illegal political contributions, or any other unlawful or improper payments or benefits.

The Supplier shall not accept, offer, promise, pay, permit or authorise money or any other thing of value in order to obtain or retain improper advantage for the Supplier, aosphere or any other person or entity.

The Supplier shall not evade tax or facilitate the evasion of tax by another person anywhere in the world.

### **Unfair business practices**

The Supplier shall comply with all applicable competition laws (including but not limited to the Competition Act 1998), including but not limited to those relating to teaming and information sharing with competitors, price fixing and rigging bids.

## Whistleblowing

The Supplier shall have in place procedures for Workers to raise concerns about wrongdoing at work (whistleblowing) without retaliation or detriment. The Supplier shall not retaliate or take disciplinary action against any Worker that has, in good faith, raised concerns about wrongdoing at work, including concerns about breaches of this Code.

# Environmental responsibility

The Supplier shall comply with all applicable environmental laws and regulations, including laws and international treaties relating to (but not limited to) climate change, waste disposal, packaging materials, emissions, discharges and the handling of hazardous and toxic materials.

The Supplier shall consider the environmental impact of its operations and take steps to improve environmental performance and reduce pollution, emissions and waste in its operations.

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# **Data protection and information security**

#### SUPPLIER CODE OF CONDUCT

# aosphere

The Supplier shall comply with all applicable data protection laws and requirements, including the UK GDPR, when processing any personal data on aosphere's behalf.

The Supplier shall have in place appropriate measures to protect the integrity and confidentiality of information (including information belonging to or supplied by aosphere) held on its systems, both physical and electronic. The Supplier shall ensure that there is no unauthorised access of information by third parties.

# Reporting

The Supplier should report any material breaches (actual or suspected) of this Code as soon as possible to us at info@aosphere.com.

# **Updating this Code**

aosphere may modify this Code from time to time. Changes to the Code will be made available on aosphere.com.

Version date: November 2024

aosphere means aosphere Limited, a limited company incorporated in England and Wales with registered number 15371365 and registered office at The Steward Building, 12 Steward Street, London E1 6FQ, United Kingdom.