

Global policy

Global Supplier Code of Conduct and Ethics

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Preamble: Policy Overview

Foundever believes that conducting business with a high standard of professional conduct, ethics and proficiency is critical to our success and the success of our clients. We continually strive to improve our processes and procedures to achieve the highest quality standards and the best results for our clients. We further believe we can only achieve these goals, among other things, by conducting business with integrity in accordance with the highest ethical standards, in compliance with all applicable laws and regulations, and by respecting accepted international standards for human rights.

Foundever is a participant of the United Nations Global Compact (the “UNGC”) and has committed to comply with the UNGC’s Ten Principles on human rights, labor practices, environment and anti-corruption. Suppliers are an integral part of our success and we expect the same commitment from suppliers as we do for ourselves. This is why we have established the following Foundever Supplier Code of Conduct.

1. Conflicts of Interest

Foundever suppliers will avoid matters and situations that appear to present conflicts of interest that may cast doubt on the fairness and integrity of our business processes. Supplier employees must exercise good judgment in giving or receiving gifts or entertainment. Bribes or kick-backs will not be accepted or paid. Hospitality, gifts or entertainment offered or provided by supplier should be reasonable in nature, enhance professional relationships and overall goodwill, and should not appear to compromise integrity.

2. Confidential Information

Foundever suppliers will protect confidential information of Foundever including that entrusted to the Supplier by Foundever’s clients, Foundever client customers, and other third parties, and comply with the data privacy laws of countries in which Suppliers conduct business, and secure access and transfer data in accordance with such laws.

3. Supplier Records

Foundever requires honest, complete, and accurate recording of information by suppliers and the retention of documents and information related to Foundever as required by applicable law. Supplier’s financial books and records related to Foundever must conform to applicable law and accounting principles.

4. Fair Trade & Competition

Foundever believes in fair trade and competition. Foundever suppliers should not make defamatory comments about the services of competitors or unlawfully use the confidential or proprietary information of others. Further, Foundever suppliers must recognize the importance of and comply with antitrust laws.

5. Dealings with Foreign Officials & Foreign Transactions

As a United States-based company, many U.S. domestic laws apply to our business inside and outside the United States. Third parties acting on Foundever's behalf must comply with the U.S. Foreign Corrupt Practices Act and the UK Bribery Act and other applicable anti-corruption laws in jurisdictions in which Foundever does business.

6. Compliance with Applicable Laws and Regulations

We respect prevailing law and expect the same of our business partners. Foundever suppliers are responsible for knowing and complying with any applicable law in connection with the services they are providing to or for Foundever or our clients, their customers and other third parties. Among others, Suppliers are expected to comply with the European Restrictions on Hazardous Substances (RoHS) Directive and REACH Regulation where applicable.

To the extent any permits, licenses, concessions or other government approval is required; Foundever suppliers are responsible for obtaining and maintaining such items while providing services to Foundever.

7. Corporate Social Responsibility

Foundever recognizes its obligations to act responsibly, ethically and with integrity in our interactions with all stakeholders be they our associates, clients, suppliers, or the communities and environment in which we all live and work.

Foundever's approach to social and environmental responsibility includes establishing standards of excellence for our suppliers. Foundever expects its suppliers to adhere to the following provisions and implement appropriate management systems to meet these requirements:

7.1 Respect and dignity

Foundever suppliers will support, respect and recognize the human rights of their employees and commit to provide a work environment that is free of harsh and inhumane treatment, harassment and unlawful discrimination. Foundever recognizes and celebrates the cultural differences among its global workforce and expects suppliers to provide a workplace that

respects those differences. Foundever suppliers should provide an environment where associates have an opportunity to communicate issues without fear of reprisal, intimidation or harassment.

7.2 Freely chosen employment

Foundever suppliers will treat their employees with dignity and respect and support an environment where work is voluntary and employment is freely chosen. Forced, bonded, indentured or involuntary labor will not be used. Employees and contractors must be free to leave their employment after reasonable notice and not be required to lodge “deposits” or surrender any government issued identification, passport or work permit or other personal document as a condition of employment.

We expect all suppliers to undertake the necessary due diligence to ensure that there is no modern slavery or human trafficking in their operations or supply chains.

7.3 Prohibition of Child labor

Foundever suppliers will adhere to United Nations and International Labour Organisation guidelines by not using child labor or exposing children or young workers to any conditions that are hazardous or unsafe to their physical and mental health and development.

7.4 Working conditions

Foundever suppliers will, at a minimum, comply with local laws regarding wage and hour issues (including those relating to minimum wages, overtime, compensation, work hours and legally mandated benefits). Suppliers will not use misleading or fraudulent recruitment practices and shall disclose to employees all information regarding key terms and conditions of their employment.

7.5 Freedom of Association

Foundever suppliers will respect the legal rights of associates to join or refrain from joining worker associations or from seeking representation. Supplier employees shall be permitted to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

7.6 Health & Safety conditions

Foundever suppliers will endeavor to minimize the incidence of work-related injury and illness, and provide employees a safe and healthy work environment in compliance with all applicable laws and regulations. Supplier suppliers shall identify and assess emergency situations in the workplace and minimize their impact through prevention and by implementing emergency

plans and response procedures.

7.7 Environment

Foundever suppliers will be good stewards of natural resources and strive to reduce the impacts associated with their business which may have adverse effects on the environment or communities in which they operate. As a minimum, Foundever expects suppliers to comply with all local and national environmental legislation, regulations and directives to protect and improve the environment, and have processes in place to ensure compliance.

Suppliers should have action plans in place to:

- Manage their environmental impact, e.g., energy reduction and waste management programs
- Incorporate pollution prevention practices, including air pollution in their premises
- Measure and reduce GHG emissions wherever possible
- Conserve resources within Foundever premises, which includes reduction of paper, water and electricity consumption
- Minimize waste; Recycle, handle and eventually dispose of all waste through safe and responsible methods
- Assess the environmental condition of property interests which they have acquired, and appropriately address the environmental impacts caused by these properties
- Take into account their suppliers and subcontractors efforts in terms of environmental responsibility and secure their supplies respect applicable environmental laws and regulations (e.g. Restrictions on Hazardous Substances (RoHS) Directive where applicable)
- Improve communications and educate their associates to proactively promote awareness of environmental concerns, actions and responsibilities through our programs

8. Reporting Responsibilities & Procedures

Foundever suppliers have a responsibility to prevent actions that may damage Foundever's reputation and business, and to avoid complicity in any human rights abuses. Foundever suppliers should disclose any activity that may have the appearance of being unethical.

Ethical, compliance, and legal concerns may be reported via the Foundever Ethics Hotline. Local toll-free numbers may be found at www.ethicspoint.com, which is answered by an independent company and is available 24 hours every day. Reports may be submitted anonymously where permitted by law. Foundever strictly prohibits and expects its suppliers to strictly prohibit retaliation against any person for making a report in good faith or cooperating in an investigation.

9. Supplier engagement process

Our goal is to work with our suppliers to ensure full compliance with these principles, as they in turn apply those to their own suppliers they work with in the delivery of goods and services for Foundever.

10. Communication

Foundever suppliers must make the Foundever Supplier Code of Conduct and other relevant information available to supplier employees in the native language(s) of the employees and supervisors.

Foundever reserves the right to amend this Code at its discretion.

