

# Admind Suppliers Code of Conduct



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# Introduction

A supplier code of conduct helps us to communicate our values to external stakeholders, like direct suppliers or consultants, and make sure that our expectations and requirements on our suppliers are printed in an official document. It helps us to express our core beliefs, while hedging ourself towards potential risks of misconduct in the supply chain.

Admind Agency Sp. z o.o. Sp.K. and each of its subsidiaries (hereinafter collectively referred to as “we”, “our”, “us”), are committed to achieving a standard of excellence in every aspect of our business.

We always strive to work to the highest professional standards and comply with all laws, rules and regulations relevant to our business.

Our corporate responsibility strategy aims to improve the impact of our business on society. We expect the same high standards from those businesses with which we work. A reliable and ethical supply chain is critical for our business.

Consequently, we expect members of our supply chain to conduct their business activities ethically and responsibly, with integrity, honesty and transparency and in compliance with all applicable laws, rules and regulations, and, where the provisions of law and this code address the same subject, to apply that provision which affords the greater protection.

This Supplier Code of Conduct is not exhaustive and this code should not be used to prevent companies from exceeding these standards.

## Applicability

This Code applies globally to all contractor who work for and conduct business on behalf of Admind Agency Sp. z o.o. Sp. K.

# Principles of Supplier Conduct

## ANTI-HARASSMENT AND ABUSE

You shall commit to a workplace free of harassment and abuse and shall not threaten workers with, or subject them to, harsh or inhumane treatment. You shall uphold the human rights of workers and treat your workers with dignity and respect.

## ANTI-DISCRIMINATION

You shall not discriminate against any worker based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation or any other legally protected characteristic, in hiring or other employment practices.

## UNDERAGE WORKERS

You shall employ only workers who meet the applicable legal minimum working age, except that in no event shall you employ any person who is under the age of 16 even if local law permits otherwise. You shall also comply with all other applicable laws in relation to your workers.

## WORKING HOURS, WAGES AND BENEFITS

You shall set working hours, wages (including but not limited to shift pay and other allowances) and over-time pay in compliance with applicable laws.

## HEALTH AND SAFETY

You shall provide and maintain a safe work environment and integrate sound health and safety management practices into your business. You shall have a system for workers to report health and safety incidents without fear of reprisal, as well as a system to investigate, track, and manage such reports, and implement required corrective action. You shall obtain, keep current, and comply with all required health and safety permits, licences and consents.

Suppliers must report to us any breach of the environmental, social or ethical rules set forth in this Supplier Code of Conduct.

## WHISTLEBLOWING

You shall have clear policies and procedures in place so that workers may report concerns about wrongdoing in their workplace without being victimised or dismissed. You shall also comply with all other applicable laws in relation to whistleblowing.

## ETHICS

You shall always be ethical in every aspect of your business, including relationships, practices, sourcing and operations.

## COMPLIANCE WITH LAW

Your business activities shall comply with all applicable laws and regulations in the countries and jurisdictions in which you operate.

## ANTI-BRIBERY

You shall not engage in corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage. You shall not provide or receive anything of value to obtain an improper business advantage or favourable treatment or exert undue influence, including offering, giving, asking for or taking any form of potential bribe or kick-back. This prohibition extends to payments and gifts of cash or in kind, made directly or through others. You must not offer any potentially illegal payments to, or receive any potentially illegal payments from, any customer, supplier, their agents, representatives or others. This includes a prohibition on facilitation payments intended to expedite or secure performance of a routine governmental action such as obtaining a visa or customs clearance, even in locations where such activity may not violate local law. You shall abide by all applicable anti-corruption laws and regulations of the countries in which you operate, including the UK Bribery Act 2010 and applicable international anti-corruption conventions.

## INTELLECTUAL PROPERTY RIGHTS

You shall respect intellectual property rights and shall not knowingly infringe the intellectual property rights of any third party. You shall manage technology and know-how in a manner that protects intellectual property rights.

## INFORMATION SECURITY

You must comply with applicable data privacy laws and must protect the confidential and proprietary information of others, including personal data, from unauthorised or unlawful processing, access, destruction, use, modification and disclosure, and against accidental loss or destruction, or damage through appropriate technical and organisational

measures including physical and electronic security procedures. You are expected to take the necessary information security measures, for both computer systems and portable electronic devices, to protect against malware and unauthorised disclosure of any proprietary information.

#### SUBCONTRACTING

You shall not use subcontractors for the provision of goods or services to us without our prior written consent, and in the event such prior written consent is given by us, you shall require the subcontractor to enter into a written commitment with you to comply with this Supplier Code of Conduct.

#### CONFIDENTIALITY

You shall safeguard our information by keeping it confidential, secure, limiting access, and avoiding discussing or revealing such information in public places. These requirements extend even after the conclusion of your business relationship with us.

## Conclusion

This Supplier Code of Conduct is intended to promote a culture within our supply chain that complies with not only the letter, but also the spirit, of all applicable laws, rules and regulations.