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# **PIB Supplier Code of Conduct**

PIB Group considers sustainability and corporate social responsibility to be an essential component of our business. We promote high standards of business behaviour and expect fairness and dignity for the people and communities where we operate.

Our suppliers are an integral part of our sustainability strategy, and we expect suppliers to PIB group to maintain suitable processes within their organisation to support compliance with applicable laws and regulations and continuous improvement with regards to the requirements in our own supplier code of conduct. When working on our behalf our suppliers represent us and we expect to be represented in a manner that enhances our reputation and enriches our activities with customers, clients, colleagues, and stakeholders.

We expect suppliers to adhere to the core behaviours of the PIB Group:

- 1. We put our clients first.
- 2. We work together.
- 3. We operate with skill and care.
- 4. We speak out when things aren't right.
- 5. We support our communities.
- 6. We reduce our impact on the environment.
- 7. We are open and cooperative with regulators.
- 8. We treat everyone fairly and with respect

Our intention is to work collaboratively with our suppliers to support adherence to these principles as laid out in this supplier code of conduct. We reserve the right to monitor compliance with these principles and expect that our suppliers will support us with data collection requests and, if deemed necessary by PIB group, audits. Suppliers are expected to follow programmes of improvement including remediation if required and must accept the contract may be terminated if terms of service standards are not fulfilled. PIB expects all suppliers to ensure adherence to this Code of Conduct during delivery of any and all services to PIB Group or any subsidiary of the Group. All suppliers are expected to additionally ensure that their own suppliers meet all requirements laid out in this Code of Conduct.

## 1 Human Rights

**Human Rights.** PIB requires suppliers to respect human rights and ensure compliance with all relevant laws, conventions and international organisations.

**Harassment, Harsh or Inhumane Treatment.** PIB expects suppliers to create and maintain an environment that treats all employees with dignity and respect, and not to engage in any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse in the conduct of its business. No harsh or inhumane treatment, coercion or corporal punishment of any kind is to be tolerated by a supplier in the conduct of its business, including concerning its business with any of its suppliers.

**Health and Safety.** PIB requires its suppliers to follow all applicable laws and regulations to ensure a safe and healthy workplace for all personnel, including the personnel of any of their suppliers. This includes mitigating potential as well as actual health and safety risks at work and in any provided housing. Clear programmes should be in place to identify and handle

emergency situations. Health and Safety training must be provided in line with local regulations and in a manner fully understandable to them.

**Working Hours, Wages and Benefits.** PIB requires its suppliers to comply with all applicable wage and working hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide all applicable legally mandated benefits.

#### 2 Labour

PIB requires suppliers to respect the rights of their employees and workers as granted by applicable national laws and regulations. Additionally, PIB expects all suppliers to remain aligned to the standards issued by the International Labour Organisation (ILO) considering their own local laws and regulations and to align to all applicable mandatory training requirements.

**Freedom of Association and Collective Bargaining.** PIB requires its suppliers to recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with the laws of the countries in which they are employed.

**Human Trafficking and Forced or Involuntary Labour.** PIB will not tolerate any form of human trafficking, slavery, forced or involuntary labour in our supply chain. We expect that suppliers will not be involved in any activity which could constitute slavery, servitude and forced or compulsory labour or human trafficking in any form. All suppliers are expected to adhere to relevant laws, conventions and the relevant UN and international protocols.

**Child Labour.** PIB suppliers will not use child labour in any form within their organisation in line with the ILO Conventions and will ensure the same of their suppliers. We support the use of legitimate workplace apprenticeship programmes which comply with all appropriate legislation and regulations relating to such apprenticeship programmes.

**Discrimination.** PIB does not tolerate any form of discrimination in hiring and employment practices on the grounds of race, color, religion, gender, sexual orientation, age, physical ability, health condition, political opinion, nationality, social or ethnic origin, union membership or marital status or any other legally protected characteristic in the areas PIB group operates. We expect our suppliers to adhere to our principles and requirements.

# 3 Ethics and Compliance

PIB requires suppliers to conduct business in an ethical manner both with PIB group and their own suppliers. We expect our suppliers to ensure they remain compliant with applicable local and international laws, conventions, and best practices.

**Corruption.** PIB expects its suppliers and their suppliers to adhere to the highest standards of moral and ethical conduct in line with all UN and OECD conventions against corruption and not to engage in any form of corrupt practices including extortion, fraud or bribery. Suppliers are expected to comply with all local laws and regulations as they relate to fair business practices and ensure the same of their employees, subcontractors and agents.

**Disclosure of Information.** Information regarding the supplier's activities, including financial situation and performance, should be in accordance with applicable regulations and prevailing industry practices. Falsification of records, either deliberately or through negligence, or misrepresentation of conditions or practices in the supply chain are unacceptable and may result in suspension or termination of the relationship. This includes disclosures on surveys, audits, verifications and programmes.

**Protection of Identity and Non-Retaliation.** Suppliers will maintain programmes to ensure confidentiality, anonymity, and protection of supplier and employee whistleblowers and facilities to raise concerns without fear of retaliation taking into account local laws.

**Privacy Protection.** Suppliers will comply with all laws regarding protection of the privacy of stakeholders including suppliers and their personnel, PIBs, its employees and its customers. This includes information gathered in the normal course of activities as well as any transmission, storage, processing or sharing.

**Data Protection.** PIB expects suppliers to comply with all relevant laws and regulations applying to data protection and to strive to implement best practices to ensure the protection of PIB data. Suppliers are required to immediately inform PIB group of any breach of personal data. Suppliers are expected to engage with our data protection review teams if requested and answer any review questions the team may have.

**Information Security.** PIB expects suppliers to keep both personal data and commercial data secure. Suppliers will have in place a documented information security framework including policies. Suppliers are expected to engage with our information security review teams if requested and answer any review questions the team may have.

**Intellectual Property.** PIB requires that suppliers comply with all applicable laws and highest industry standards regarding intellectual property rights.

**Conflict of Interest.** Suppliers are expected to disclose to PIB (and indirect suppliers are expected to disclose to supplier, for further disclosure to PIB): (i) any situation that may appear as a conflict of interest; and (ii) any PIB employee or other professional under contract with PIB who may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

**Gifts and Hospitality.** PIB will accept only that which it deems to be "reasonable and proportionate" hospitality and will not allow hospitality to influence a business decision or to lead to unfair business advantage. PIB expects suppliers to adhere to this requirement in any business with, or on behalf of, PIB Group.

**Unrestricted Competition.** PIB requires suppliers to always compete in a fair manner and to comply with applicable antitrust laws and regulations.

**Financial Crime**. PIB Group complies with all applicable anti-bribery, anti-money laundering, economic sanctions, and anti-fraud laws ("Financial Crime Laws") and has policies and procedures in place that reflect international best practice and relevant guidance. Our Suppliers are expected similarly to comply with all applicable Financial Crime Laws and to have policies and procedures in place which are designed to ensure such compliance both within their own organisations and their suppliers.

**Sanctions.** PIB expects its suppliers to comply with all applicable sanction regimes, to regularly review their compliance and perform swift remediation should a breach be found.

### 4 Environment

PIB requires its suppliers and their suppliers to implement responsible environmental policies in accordance with all applicable local, national and global environmental laws. Suppliers are expected to develop procedures to minimize their impact on the environment in accordance with principles of the UN Global Compact.

**GHG Emissions.** PIB expects suppliers to be compliant with all applicable local laws and regulations pertaining to GHG emissions calculation and disclosure. Additionally, all suppliers are expected to provide this information to PIB Group upon request to support our own emissions reporting activities. Suppliers should strive to reduce their own emissions in

line with the ambitions of the Paris climate agreement.

**Water Use and Management.** PIB expects suppliers to monitor and manage water usage in line with applicable laws and regulations and strive to improve efficiency over time.

**Pollution.** PIB expects its suppliers and their suppliers to comply with relevant local laws and regulations as pertaining to pollution, strive to minimize their environmental impact, and make fair recourse to affected stakeholders where required.

**Waste.** PIB requires its suppliers and their suppliers to establish and maintain controls designed to minimize waste and its impact throughout the supply chain, including the production and packaging of waste and end-of-life treatment of products, encouraging recycling and reuse at all stages. PIB expects its suppliers and their suppliers to establish and maintain controls to eliminate hazardous substances and materials from products and services, and to promote the use of suitable alternatives, whenever practicable. Where substitution is not possible, suppliers will distribute information on product hazardous substances as well as appropriate handling instructions for safe end-of-life treatment and disposal.

# 5 Corporate and Management Systems

PIB requires suppliers to have appropriate management systems that ensure compliance with applicable laws and regulations, with PIB requirements, and with this Code of Conduct. These are expected to include but are not limited to the requirements defined below.

**Risk Management.** PIB requires suppliers to identify and manage legal, health and safety, labour, environmental, reputational, ethical, and financial risks in their activities and ensure their suppliers have suitable processes in place for the same. Suppliers are expected to inform PIB of relevant risks, arising either within their own organization or a supplier, upon discovery and take actions to remedy them.

**Policy and Programme for Business Continuity.** PIB requires that suppliers should be prepared for any disruptions to their business with disaster plans in place to protect their employees and the environment and to ensure a continuity plan is in place to minimize disruption to ongoing trading and delivery of goods and services to PIB Group.

**Implementation and Monitoring Progress.** PIB requires suppliers to implement programmes in line with these Principles and monitor compliance. It is expected that suppliers quickly remediate any gaps.

**Training.** PIB requires suppliers to ensure managers and workers are aware of these principles and, where appropriate, provide adequate training to relevant individuals to ensure compliance.

**Communication with Suppliers.** PIB expects suppliers to have processes for communicating these requirements to their own suppliers and have processes for monitoring compliance with these Principles and the supplier's own policies.