

# Supplier Code of Conduct

TecEx, a division of VAT IT and all its further subdivisions ("TecEx") chooses suppliers based on how well they meet their standards for quality, price, delivery, service, diversity, reputation, ethics, environmental practices, business practices, and long-term benefits to TecEx and its customers.

This Supplier Code of Conduct (the "Code") confirms that suppliers are committed to upholding the highest standards and promoting a culture of openness, trust, and integrity. The goal of this Code is to ensure that suppliers have measures in place to protect their employees, consultants, customers, partners, and TecEx from any illegal or harmful actions by anyone working for or with TecEx.

All supplier staff are required to adhere to the terms and conditions of this Code. Any questions about this Code should be directed to TecEx.

Suppliers must ensure that all their staff are responsible for following and upholding all aspects of this Code, and complying with their company's governing documents (e.g., policies, standard operating procedures). All supplier staff are also responsible for raising questions if they are unsure whether this Code and any of their related company governing documents are being upheld.

If a supplier identifies a violation of this Code, they must notify TecEx as soon as possible. Suppliers agree not to retaliate against any supplier colleague who makes a complaint in good faith. Any act of retaliation is considered a violation of this Code.

If it is determined that a supplier has not complied with the Code, TecEx may suspend its engagement with the supplier. Further actions, including termination of the engagement, may be taken. Conduct that violates the Code may also violate applicable laws as well as other supplier, TecEx, or customer policies, and may subject TecEx, the supplier, and supplier staff to prosecution and/or legal action.

## Ethics

Suppliers must comply with all applicable laws, rules, and regulations when working with TecEx's customers, regulatory agencies, and in the legal jurisdictions where TecEx conducts business. This includes laws and regulations related to:

- Labor and employment
- Health and safety
- Environmental protection
- Anti-corruption and anti-bribery
- Anti-money laundering
- Competition
- Intellectual property
- Data protection
- Consumer protection

Suppliers must also comply with TecEx's own policies and procedures, which are designed to ensure that TecEx's supply chain is ethical and sustainable:

- Suppliers must conduct their business in an ethical manner and act with integrity.
- TecEx will not use any supplier who does not maintain the high level of ethical standards as outlined in this Code.
- Corruption, extortion, and embezzlement are prohibited. Suppliers must not pay or accept bribes or participate in other illegal inducements in business or government relationships.
- Suppliers must conduct their business in a fair and competitive manner, in compliance with all applicable anti-trust laws. They must also employ fair business practices, including accurate and truthful advertising.
- Suppliers must not use child labour and must not use any subcontractor who uses child labour.
- TecEx will not use any supplier who uses child labour, or where one of TecEx's employees has been subject to a violation of harassment or discrimination.
- Suppliers must maintain the confidentiality and proprietary information of TecEx and its customers.

## Human and Labour Rights

Suppliers must be committed to upholding the human rights of workers and treating them with respect and dignity, including freedom from discrimination and harassment.

Suppliers must recognize the dignity and worth of every person and provide equal rights and opportunities based on merit and ability, without discrimination and harassment that is contrary to law.

Suppliers must have an environment that values diversity and inclusion.

Suppliers must have a climate of understanding and mutual respect for the dignity and worth of each person so that each person feels they are a valuable resource and are able to contribute fully to the development and well-being of that company.

All supplier staff has a right to equal treatment with respect to employment, free from harassment and without discrimination based on race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, religion, sex, sexual orientation, age, record of offences, marital status, same sex partnership status, family status, disability, military status, and any other ground listed in applicable laws of the province, state or country where the supplier conducts business.

All supplier staff has a right to freedom from any action that creates a hostile or offensive work environment.

Supplier staff are responsible for ensuring a work environment that is free from discrimination and harassment by:

- Conducting themselves in a professional manner and treating others with mutual respect and dignity.
- Refusing to participate in or tolerate any discrimination or harassment.
- Reporting any suspected incidents of discrimination or harassment to supplier management.

Suppliers should have processes in place so if any member of the supplier's staff feels they have been discriminated against or harassed, they have a reporting protocol that allows for immediate notification to the alleged offender that the action is unwelcome, and that if the staff is uncomfortable with directly confronting the alleged offender, or if it fails to resolve or correct the problem, then they can bring it to the attention of supplier management.

Suppliers must have processes for, and supplier staff are to be familiar with, governing documents addressing the following subject matter:

- Discrimination and Harassment – Prevention and Reporting
- Workplace Violence and Harassment – Prevention and Reporting

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.

Suppliers shall communicate with the worker regarding the basis on which they are being compensated in a timely manner.

Suppliers are also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime.

## Health and Safety

Suppliers must provide a safe and healthy work environment in compliance with applicable provincial, state, and/or federal laws and regulations.

Supplier staff must follow safe and healthy work practices.

Any safety hazard, unsafe practices, or accidents must be reported immediately to their manager, Health and Safety Committee members, or to Supplier Human Resources.

It is the responsibility of all supplier staff to take the necessary precautions to protect themselves and those around them, and to take action to correct unsafe practices or conditions.

It is a violation of this Code for any supplier staff to be under the influence of alcohol, drugs, illegal substance or to be impaired from any other substance while working. It is also a violation to use, possess, distribute, buy or sell any illegal substances while at the workplace or while working on supplier's behalf outside of the workplace.

Supplier staff must not participate or engage in any violent or threatening acts whether physical or verbal while at the workplace or while acting on behalf of supplier outside of the workplace.

Suppliers must have a process for, and supplier staff are to be aware of, a governing document for Health and

Safety and, if applicable, a Health and Safety Policy Statement. Suppliers must have processes in place so that each supplier staff will promptly report to their manager or their Health and Safety Committee representative, any situation or business practice that poses a safety and health concern.

## Environmental Protection

Suppliers must operate in a manner that is environmentally responsible and efficient and must minimize engagement in practices that may adversely impact the environment.

Suppliers are encouraged to work diligently to support and actively participate in environmental initiatives across their entire company, from the sourcing of services, office operational management, to business travel, and to delivering services to TecEx and TecEx's customers.

Suppliers must have processes in place so that each supplier staff will promptly report to their manager any situation or business practice that poses an environmental concern.

Suppliers are encouraged to support projects that generate energy from renewable resources. Each supplier staff strives to reduce energy use, water use, waste generation, and the use of other natural resources.

Suppliers must support waste reduction and recycling efforts and must do their best to reduce the environmental impact of operations and mitigate environmental risks.

Suppliers and supplier staff must comply with all Environment, Health and Safety (EHS) regulations and supplier internal EHS standards.

## Privacy and Security

Suppliers must enter and be bound by non-disclosure agreements (NDAs) and data processing agreements (DPAs) with TecEx. These agreements include protections for confidentiality, intellectual property, data security, and data subject privacy.

Suppliers must safeguard and make only proper use of confidential information to ensure that worker, and data subject privacy rights are protected.

Suppliers must enter into non-disclosure and data processing agreements with their own suppliers and/or sub-processors to ensure that TecEx's entire supply chain is adequately protected.

TecEx requires suppliers to explicitly acknowledge and adhere to the principles embodied in the TecEx Supplier Code of Conduct, and to ensure that their own suppliers will also comply with these principles.

## Training

Suppliers must have a training program that achieves an appropriate level of knowledge, skills, and abilities in management and workers to address the expectations outlined in this Supplier Code of Conduct.

## Continual Improvement

Suppliers are expected to continually improve their performance by setting performance objectives, executing implementation plans, and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

This means that suppliers should regularly assess their own performance against this Supplier Code of Conduct and identify areas where they can improve. They should then develop and implement plans to address these areas and monitor their progress over time.

If suppliers identify any deficiencies in their performance, they should take immediate corrective action to address them. This may involve changing their policies and procedures, training their employees, or investing in new equipment.

By continually improving their performance, suppliers can help to ensure that they are meeting the expectations of TecEx and its customers.

Here are some specific examples of how suppliers can continually improve their performance:

- Set specific and measurable performance objectives.
- Develop and implement implementation plans.
- Monitor progress and adjust as needed.
- Identify and address deficiencies.
- Take corrective action.
- Communicate progress to stakeholders.

## Audit

Suppliers agree that TecEx has the right to perform annual due diligence checks. The purpose of the checks is to validate compliance with the requirements of the Supplier Code of Conduct, Quality, and Security requirements, including standard operating procedures (SOPs) and applicable laws.

Suppliers agree to respond to all audit findings in writing within thirty (30) calendar days of receipt of the audit report. They also agree to respond to any subsequent follow-up discussions as deemed necessary by TecEx.

Except with respect to audit findings that are the subject of a bona fide dispute, the supplier will promptly comply with the requirements of the Supplier Code of Conduct at its own expense.

Suppliers may be expected to comply with an external review based on the requirements of TecEx and its customers. This review may be conducted by a third party either in person or through an online platform. This means that suppliers may be required to participate in an external review of their compliance with this Supplier Code of Conduct. The review may be conducted by a third-party organization, such as a certification body or an independent auditor.

The purpose of the external review is to verify that suppliers are meeting the expectations of TecEx and its customers. The review will typically assess the supplier's policies and procedures, as well as their implementation and monitoring activities. By participating in an external review, suppliers can help to demonstrate their commitment to ethical and sustainable business practices.

## Additional Resources

UN Sustainable Development Goals: <https://www.un.org/sustainabledevelopment/>

General Data Protection Regulation (GDPR): <https://gdpr-info.eu/>

The Foreign Corrupt Practices Act (FCPA): <https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>

Ecovadis: <https://ecovadis.com/>

## Acceptance

The supplier will ensure that their staff and third parties providing services to TecEx, a division of VAT IT and all its further subdivisions will be given a copy of the TecEx Supplier Code of Conduct, as amended from time to time, to read, understand, and agree to follow upon commencement of such work and a renewed annually.

Supplier:

Signature:

Print Name/Title:

Date: