



## SUPPLIER CODE OF CONDUCT

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**Approved on:** March 2022  
**Revised version:** V1.1 (July 2022)

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ATALIAN GLOBAL SERVICES, including each of its business units, affiliates, and subsidiaries, (collectively, “ATALIAN”) is firmly committed to conducting business with the highest integrity and in compliance with the letter and spirit of the law. As an industry leader and a responsible business, ATALIAN seeks to use its position to promote the highest standards for ethics and business conduct wherever ATALIAN operates. As a supplier of products and/or services to ATALIAN, your company is critical to ATALIAN’s success, and in order for ATALIAN to provide superior services in a responsible manner, ATALIAN requires its suppliers to comply with this Supplier Code of Conduct (this “Code”).

This Code sets forth ATALIAN’s fundamental ethical and business conduct requirements for its suppliers. This Code is not intended to be an exhaustive list of all requirements to be followed by suppliers; but is intended to be a high-level overview of such requirements. All references in this Code to “Laws” means all applicable laws, regulations, directives, rules, decrees, and governmental orders.

Suppliers are responsible for ensuring that their directors, officers, employees, agents, representatives, suppliers, subcontractors, and other business partners understand, and comply with, all Laws applicable to their business and the requirements set forth in this Code. Suppliers will promptly notify ATALIAN of any known or suspected violation of this Code. The ethical standards described below are the same as those we apply in our own entities throughout the world.

## ANTI-BRIBERY/CORRUPTION

We apply a « zero-tolerance » policy on corruption and influence peddling. It is notably prohibited for all employees or third parties to offer, promise, give, solicit, or accept any gift, offer, or promise that could constitute an act of corruption.

Suppliers shall fully comply with all anti-bribery and anti-corruption Laws applicable in the jurisdictions in which suppliers engage in business with or on behalf of ATALIAN. Suppliers further certify that they have implemented adequate procedures to so comply, including by doing their own due diligence on their affiliates, subsidiaries, agents, subcontractors, representatives, and employees who will work on behalf of ATALIAN and by communicating to them the requirements set out in this Code or comparable requirements and/or training.

Without prejudice to the generality of the foregoing, suppliers shall not:

- Engage in any form of bribery or corruption of Government Officials.
- Engage in any form of “commercial” or private sector bribery or corruption, including but not limited to, “kickbacks” to private, individuals to obtain or retain business.
- Accept any type of bribes or improper payments.
- Give, offer, or accept other forms of bribery, including improperly giving anything of value or making any facilitation payments.

## CONFLICT OF INTEREST

Suppliers must avoid all conflicts of interest or situations giving the appearance of a conflict of interest when doing business with ATALIAN, such as a direct personal or financial interest in a business decision or vendor selection. Likewise, suppliers shall not, enter into any business relationship with any director, employee, or representative of ATALIAN that may create a conflict of interest.



## GIFTS AND GRATUITIES

No gift considered to be morally inappropriate or indecent can be accepted by a Group Employee or offered by a Group Employee to a third party. Gifts should be provided as a token of esteem, courtesy, or in return for hospitality and should comply with local custom.

The following gifts can **never** be accepted or offered:

- Gift of cash, or cash equivalent such as gift cards or gift certificates
- Gift prohibited by local Law
- Gift offered to public persons (elected officials, civil servants, employee of an international organization or State company, etc.)
- Gift not delivered directly to the recipient at his business address
- Gifts offered or received for bribery purposes (e.g., to obtain or retain business, or to secure an improper advantage such as securing favourable tax treatment)
- Gifts prohibited by the recipient's organization
- Gifts to family members of customers, suppliers, or other business associates
- Gifts, gratuities or other items that personally benefit the Group Personnel, regardless of value.

## FRAUD

Suppliers must not engage or be involved in any kind of fraud or fraudulent activity against or for the benefit of ATALIAN, including but not limited to, dishonest behaviour, forgery, falsification of documents and information, theft, misuse or removal of records, misappropriation of company assets.

## FAIR COMPETITION

Suppliers must not engage in any illegal anti-competitive conduct or deceptive trade practice for any reason whatsoever, whether on behalf of ATALIAN, suppliers', or others. Accordingly, suppliers must never rig bids, fix prices, or provide or exchange customer's, ATALIAN's, Suppliers', or others' competitively sensitive information (including, without limitation, price, cost, and technical data) with ATALIAN's competitors or competitors of suppliers. Suppliers must never denigrate ATALIAN's competitors or Suppliers' competitors, or their products or services.

## INTERNATIONAL TRADE

Suppliers must comply with all international trade rules and related standards, including but not limited to customs regulations, export controls, transportation rules, sanctions and embargoes, anti-money laundering and counter terrorist financing Laws.

Suppliers must not engage in or attempt to engage in any transaction involving proceeds derived from unlawful activity or engage in any relationships with designated individuals and entities, who are subject to international economic sanctions.

## TAX EVASION

ATALIAN requires that all suppliers shall, and shall ensure that any supplier group companies, employees or subcontractors shall not engage in any activity, practice or conduct which would constitute either a tax evasion offence, a facilitation of a tax evasion offence or failure to prevent a facilitation offence and have and maintain in place such policies and procedures as are reasonable to prevent the facilitation of tax evasion by another person, including employees of the supplier, the supplier group companies or any subcontractors.

## LABOUR

Suppliers must follow all applicable Laws in the countries in which it operates, and be committed to the value of, and respect for, all people. Suppliers are responsible for respecting human rights in its operations and will comply with the standards set forth in the United Nations Universal Declaration of Human Rights. The standards set forth in this Code apply to all workers, including, without limitation, temporary, migrant, student, contract, direct employees, and any other type of worker of suppliers. The applicable labour standards are:

1. **Child Labour.** Suppliers will not engage in or condone the unlawful employment or exploitation of children in the workplace. Suppliers will be committed to combating the exploitation of children, and therefore prohibit any use of child labour with any vendor, suppliers or other suppliers' arrangements.
2. **Human Trafficking, Modern Slavery and the Right to Voluntary Labour.** Suppliers will respect the free choice of all persons and strictly prohibit forced or compulsory labour for any employees. Suppliers will not do business or associate with third parties that condone or are engaged in the practice of coercing or imposing work with little or no freedom of choice. Suppliers will comply with the United Nations Guiding Principles on Business and Human Rights and local Laws and policies, such as the UK Modern Slavery Act 2015.
3. **Freedom Against Prejudice and Discrimination.** Suppliers will strive to maintain an inclusive workplace free of harassment and discrimination based on a person's status such as race, colour, religion, national origin, gender, sexual orientation, gender identity, age, disability, veteran or military status or other characteristics protected by Law.
4. **Safe and Secure Workplace.** Suppliers will be dedicated to providing a safe and secure workplace for all of its employees, and prevent accidents to employees, customers, and visitors. Suppliers' leadership will ensure compliance with this commitment in every location and facility in which suppliers operate.
5. **Working Hours and Wages.** Suppliers will comply with all Laws dealing with the wages suppliers pay its employees and the hours they work. Suppliers will be committed to being an ethical employer that strives to improve labour standards, respects its employees' contributions, and rewards them fairly.
6. **Freedom of Association.** Suppliers will respect the rights of employees and comply with all Laws concerning freedom of association and collective bargaining.

## HEALTH AND SAFETY

Suppliers must comply with all health, safety, and security Laws of the jurisdictions in which it does business and limit worker exposure to potential safety hazards. When necessary to safely perform a job, Supplier will provide workers the proper personal protective equipment and ensure proper maintenance of the equipment.

Suppliers will record, track, and report all occupational injuries and illnesses as required by applicable Laws.

## ENVIRONMENT AND SUSTAINABILITY

Suppliers shall observe and comply with all applicable environmental Laws as well as implement an effective policy that promotes the efficient use of resources and energy, as well as clean and low energy solutions. Suppliers shall take a proactive approach to working with ATALIAN towards reducing our environmental impact.

ATALIAN therefore requires that Suppliers share its commitments to:

- Continually improve our environmental performance and results and to review them on a regular basis
- Aspire to provide products and services that enhances ecology and ecosystems
- Have a written environmental / sustainability policy appropriate to the size and nature of their operation which addresses preventing, mitigating, and controlling serious environmental and health impacts from their operations.

## DATA PRIVACY AND INFORMATION SECURITY

When suppliers act as a Processor of the Personal Data, they agree that while acting on behalf of ATALIAN, they will comply with all applicable data privacy legislation and regulation, and shall follow the principles of the ATALIAN Group Data Protection Policy, ensure that all Personal Data that suppliers process under ATALIAN instructions or to which suppliers have access as a result of engaging in business with or on behalf of ATALIAN is kept confidential, is used only for the purposes defined by ATALIAN, is adequately protected and in particular that there are appropriate legal, organizational and technical measures in place to ensure such protection. Suppliers will inform ATALIAN as soon as it receives any enquiry to exercise rights on personal data of Data Subjects or to execute the relevant authorities' requests or orders regarding the personal data it manages in connection with its relationship with ATALIAN. If suppliers need to transfer any Personal Data processed under ATALIAN instructions outside the European Union, they should implement the appropriate measures for further data security and, in particular, establish with any sub processor all the appropriate safeguards, including the standard contractual clauses provided by the European Commission.

As an organisation ATALIAN strives to comply with the provisions of ISO 27001. ATALIAN expects suppliers to conduct its business in a way that recognises the importance of and seeks to prioritise, information security. ATALIAN will periodically review compliance with the confidentiality & data protection provisions the suppliers agree to adhere to when contracting with ATALIAN.

## CHARTERS

ATALIAN has been a member of the United Nations Global Compact since 2012. ATALIAN is a signatory of the Diversity Charter (2014) and of the Caring for Climate declaration (2015).

Nota Bene – Specific application for UK: ATALIAN has also committed to the Chartered Institute of Procurement and Supply's (CIPS) Corporate Code of Ethics. It is ATALIAN's own recommendation that suppliers follow these guidelines when delivering products or performing a service in UK.

## WHISTLE-BLOWING

Suppliers are expected to enable all their employees to report suspected wrongdoing as soon as possible to provide all employees guidance on how to raise those concerns; to ensure the confidentiality of the whistleblower, the person involved, and the information provided; to ensure the best possible response; and, to organize the protection of the whistle-blower against potential reprisals

#### PROMOTE THE PRINCIPLES OF THIS CODE

Suppliers are committed to promote the above-mentioned principles to its own suppliers, providers and or sub-contractors. Suppliers are also committed to ensure that its own suppliers, providers, and sub-contractors respect all the principles upheld in the Code.

#### ATALIAN COMPLIANCE VERIFICATION

Suppliers acknowledge and agree that suppliers are solely responsible for full compliance with this Code by suppliers' directors, officers, employees, representatives, suppliers, contractors, and other business partners. Suppliers will nonetheless permit ATALIAN and/or its representatives to assess Suppliers' compliance with the expectations set forth in this Code when rendering services or furnishing products for ATALIAN. Suppliers will fully cooperate with ATALIAN in such assessments, and suppliers will promptly correct any non-conformances identified during such assessments.

Any violation or any breach of conduct of this Code by the suppliers or their subcontractors will result in a review and possible termination of the business relationship.

If this Code conflicts with the terms of any suppliers' contract with ATALIAN, and the contract term is more restrictive than this Code, the suppliers must comply with the more restrictive terms of the contract.

## ACCEPTANCE OF THE TERMS OF THE SUPPLIER CODE OF CONDUCT

In the name of ..... (name of the company), whose registered office is  
at ..... (address of the registered office),

- I confirm that ..... (name of the company) has received and read the Supplier Code of conduct from ATALIAN
- I confirm that ..... (name of the company) shares the same ethical standards as those set out in this Code by ATALIAN
- I am aware that ..... (name of the company) must immediately inform ATALIAN in the event of identification of incidents within our operations or our supply chain, regarding our shared ethical principles disclosed in the ATALIAN SUPPLIER CODE OF CONDUCT, which could negatively impact our reputation as an ethical company or that of ATALIAN

.....[Full Name],  
....., [title / position] declaring himself duly authorized  
for the purposes hereof.

Signature

Done at [place] .....

Date .....