



Suppliers Code of Conduct

afiniti

www.afiniti.com

Introduction

Afiniti is committed to respecting the highest standards of corporate responsibility and ethical conduct in everything we do, including in our transactions with third-party vendors and suppliers.

We base our relationships on lawful and fair practices and are committed to only working with Suppliers who comply with ethical, legal, sustainable, and socially responsible business practices.



Supplier Responsibilities

This Supplier Code of Conduct (or “Code”) sets forth the minimum standards of business conduct that must be met by any third-party vendors and suppliers (hereinafter each a “Supplier” and collectively “Suppliers”) that sells products to or does business with Afiniti. This Code applies to all Suppliers and their subsidiaries, affiliates, and subcontractors. The Code is applicable to all Suppliers, including their employees, directors, officers, workers, agents, advisors, and representatives (collectively “Representatives”). The Supplier is fully responsible for ensuring that the Code is provided to and aits Representatives throughout its operations and entire supply chain. Compliance with the Code is required in addition to any other obligations in any agreement a Supplier may

Supplier agrees to comply with the following responsibilities and obligations:



Compliance with Applicable Laws and Regulations

Suppliers must comply fully with all local, national, and international laws and regulations applicable to them. Where national law and international human rights, labor and environmental, health and safety standards differ, Supplier should meet and follow the higher standard.



Human and Labor Rights

As a global business, Afiniti is deeply committed to respecting human rights wherever we operate in line with the UN Guiding Principles for Business and Human Rights. Afiniti strongly believes everyone deserves a fair and ethical workplace and that all workers must be treated with dignity and respect. Afiniti expects our Suppliers to uphold these same standards by supporting and respecting the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses. This includes complying with all applicable laws and standards concerning:

- Ensuring fair wages, equal opportunity, working hours, and benefits
- Respecting freedom of association and collective bargaining
- Prohibiting discrimination, harassment, and abuse
- Providing a safe and healthy work environment
- Prohibiting child labor
 - Suppliers must adhere to local laws relating to the minimum working age and not engage in the employment of child labor, directly or indirectly. Child labor as defined by the International Labour Organization (ILO) refers to any work performed by children under the age of 12, non-light work done by children aged 12–14 and hazardous work done by children aged 15–17. Suppliers should also ensure that working hours for those of school age are not exceeding the maximum hours permitted on a school day.
- Preventing forced labor, modern slavery, and human trafficking
 - Afiniti does not tolerate forced labor or human trafficking by our Suppliers. All Afiniti Suppliers must ensure that all labor in their workforce and supply chain is voluntary, and that workers are allowed freedom of movement. All forms of forced labor and human trafficking must be prohibited including, but not limited to, any form of prison, slavery, bonded or forced indentured labor. Suppliers must actively address the risk of modern slavery in their supply chain, have appropriate channels to report any concerns, and demonstrate reasonable and adequate due diligence measures that are appropriate for their organisation.

Health and Safety

Suppliers must comply with all applicable health and safety laws. Suppliers must also provide a safe, healthy, and hygienic working environment with an awareness of any industry-specific hazards. Suppliers shall ensure that all legal requirements including, but not limited to, occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing are addressed. Suppliers shall implement procedures and safeguards to prevent workplace hazards and work-related accidents and injuries. Relevant training and adequate personal protective equipment should be provided to employees and Representatives, as applicable. Suppliers must also have appropriate protocols for reporting and investigating workplace incidents.

Environmental & Community Responsibility

Afiniti is committed to reducing our environmental impact across our supply chain and to supporting sustainable practices. Suppliers must develop, implement, and maintain environmentally responsible and sustainable business practices and operations. This includes but is not limited to:

- Minimizing waste, emissions, and resource consumption
- Complying with environmental laws and regulations
- Promoting sustainable sourcing of materials and production practices
- Ensuring operations are in harmony with community stakeholders and not infringing upon land, forest, and water rights of the community.

Ethical Business Practices

Afiniti is committed to operating our business with the highest ethical standards. Our Suppliers are expected to operate with the same level of integrity and ethics. Our Suppliers' business dealings should be fair, legal and honest. This includes:

- Maintaining policy controls in place that prohibit and detect corruption, bribery, improper gifts, extortion, embezzlement, and conflicts of interest.
- Complying with all applicable anti-corruption and bribery laws and regulations of the countries in which they operate, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, and any other applicable international anti-corruption conventions.
- Not engaging in illegal cooperation with competitors including bid rigging, price fixing, market allocations, or any other prohibited conduct that limits free and fair competition.
- Accurately reflecting their business dealings in their books and records.
- Complying with all applicable economic sanctions, anti-money laundering, and anti-tax evasion legislation and rules.
- Only using Afiniti information and property (including pricing guides, revenue strategy, technical specifications or calculations) for the purpose for which they are provided to the Supplier and for no other purposes.
- Taking appropriate steps to safeguard and maintain the confidentiality of Afiniti proprietary information, including maintaining it in confidence and not disclosing it to third parties without Afiniti's prior written permission.
- Complying with applicable trade control laws and regulations in the import, export, re-export or transfer of services, software, technology or technical data, including any restrictions on access or use by unauthorized persons or entities.



Diversity, Equity, and Inclusion

Suppliers are encouraged to promote diversity, equity, and inclusion in their workforce and business practices, and should pay particular attention to respecting the rights of vulnerable or marginalized worker populations most at risk of discrimination. Supplier commitments to inclusion should include:

- Suppliers shall not discriminate in hiring or employment practices based on pregnancy, childbirth or related medical conditions, race, religious creed, colour, sex, gender, gender identity or expression, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, union membership or any other criteria protected under law.
- Hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination are based solely on the worker's skill, ability, experience and performance or otherwise consistent with local law.
- All workers will be treated with dignity and respect and will not be subject to a hostile work environment consisting of threats or use of any form of unethical treatment, bullying or intimidation, violence or corporal punishment, or other forms of physical, mental, or sexual harassment or abuse.



Privacy and Data Protection

Afiniti believes privacy is a fundamental human right and is committed to respecting the privacy of all individuals we work with. Whether Supplier processes data on behalf of Afiniti, our employees, or clients, or whether Supplier operates independently as a data controller, all Suppliers are expected to comply with all privacy and data security laws in all the jurisdictions in which they operate or are established. Suppliers are expected to maintain and process personal and sensitive data in a secure and confidential manner when delivering products or services.



Artificial Intelligence

Suppliers must notify Afiniti in advance if AI is incorporated within any of the operations, systems, services, or software provided to Afiniti. Afiniti expects all Suppliers to adhere to the highest standards of responsible and ethical practices throughout the development and use of AI. Supplier must be accountable for AI systems throughout their lifecycle and ensure that any development or use of AI is in compliance with all applicable laws, regulations, contracts, and this Code.

Supplier shall:

- Ensure that any AI systems used or designed by Supplier are robust, secure, and safe throughout their entire lifecycle;
- Develop and use AI systems in a manner that respects human rights including fairness, equality, inclusivity, diversity, privacy, and data protection;
- Commit to using AI in a way that avoids harm, discrimination and bias;
- Be transparent about AI systems and ensure any decisions made by AI are subject to human oversight;
- Ensure the explainability, auditability, and traceability of AI systems used or developed by Supplier;
- Establish and maintain appropriate governance, policies, and procedures that promote the responsible, accountable, and ethical use of AI systems; and
- Be prepared to demonstrate their adherence to the above principles upon request.

Monitoring and Enforcement

Supplier acknowledges that Afiniti reserves the right to audit, assess and monitor Supplier's compliance with this Code at any time, and any violations of this Code may jeopardize its relationship with Afiniti. However, Afiniti expects that Suppliers will actively audit and monitor their day-to-day management processes with respect to this Code and provide evidence to Afiniti upon request. Supplier must maintain appropriate documentation and records to ensure such compliance. Non-compliance may result in corrective actions, termination of contracts, or legal action. Afiniti reserves the right to modify or update this Code from time to time as needed to reflect Afiniti's commitments and values, or any changes in laws, regulations, and industry standards.

Reporting Concerns

Subject to local laws and any legal restrictions, each Supplier is expected to promptly inform Afiniti of any compliance concern involving this Code regardless of whether it directly impacts Afiniti, and will take such steps as Afiniti may reasonably request to assist Afiniti in the investigation of any concern involving Afiniti and the Supplier.

Afiniti's policy forbids retaliation by Suppliers against any person or worker reporting a concern in good faith or who has sought advice regarding this Code.

To report a concern, please
e-mail compliance@afiniti.com

OR

utilize our SpeakUp platform
[https://www.afiniti.com/legal/
report-a-concern/](https://www.afiniti.com/legal/report-a-concern/)

*Approved September 2025
Version 1.0*