



Pricefx's Code of Conduct for Suppliers



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1. Introduction

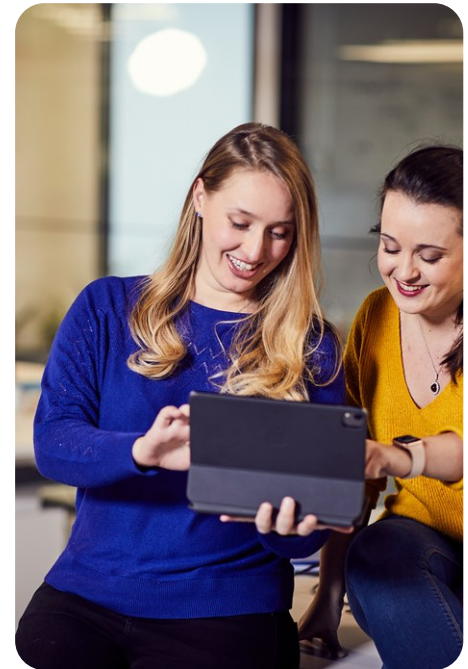
This Code sets forth the minimum standards of business conduct that we expect from all of our Suppliers: Please keep in mind that laws can change and might differ from country to country. If an applicable law or regulation imposes a higher standard than what is in this Code, that is the standard that will be binding on you.



2. Human rights

- **Child labour**

Suppliers are obligated to adhere to the rules and avoid employing individuals under the age of 15, or below the minimum age defined by local legislation, whichever is higher. Exceptions can only be granted for approved programs or if local regulations dictate a higher minimum age. Furthermore, Suppliers must ensure that their workers participate in labour voluntarily and are not subjected to threat or punishment. Workers under the age of 18 should not have their education or vocational training disrupted, and they should not be assigned to work during nighttime or perform tasks that could pose risks to their physical, mental, or emotional well-being.



- **Human trafficking / modern slavery**

Pricefx firmly forbids the practices of modern slavery and human trafficking and will not support or engage with any enterprise that is knowingly involved in any form of slavery. Additionally, Suppliers must not allow or help with forced labour in any way, such as through threats or manipulation.

Pricefx also expects Suppliers and their subcontractors to have policies in place that require their employees to act in accordance with all relevant regulation and legislation, acting ethically and with integrity. Suppliers must provide safe work environment, treat workers with respect and dignity, and conduct their labour practices ethically and in compliance with the law.

- **Human rights**

Suppliers must not only uphold and respect the preservation of globally recognized human rights, but also to ensure they are not involved in any violations of these rights.

- **Wages and hours**

Suppliers are required to adhere to all relevant labour laws, including those governing wages, working hours, and employee benefits. They must ensure that wages are paid accurately and on time, and that overtime is compensated and voluntary. All employment practices must be legal, with no attempts to evade the provision of legally mandated benefits.

- **Diversity, discrimination, and harassment**

We are committed to fostering an inclusive and diverse environment where all individuals are treated with respect and dignity. Furthermore, we have zero tolerance for any form of harassment or discrimination in Pricefx, and this extends to our Suppliers. Suppliers are expected to uphold fairness and respect in their treatment of employees, providing equal opportunities for all. Suppliers should foster a diverse, equitable, and inclusive work environment that encourages individuality and provides mechanisms for reporting concerns or potential unlawful practices, in all cases ensuring that employment practices comply with applicable laws and regulations concerning equity, discrimination, harassment, and workplace accommodations.

- **Freedom of association**

Suppliers are required to respect the legal rights of workers to establish and become members of organizations they prefer, such as labour organizations or associations for collective bargaining. Workers, or their representatives, should not be discriminated against, harassed, retaliated against, or intimidated for associating with such organizations.

- **Non-retaliation**

Suppliers are expected to have policies against unlawful retaliation towards employees who report ethical or compliance issues in good faith or exercise legal rights, and a grievance mechanism should be in place.

- **Health and safety**

We expect our Suppliers to provide a healthy and safe work environment, including appropriate personal safety equipment in compliance with all applicable health and safety laws and regulations. Suppliers must also provide all workers with legally required adequate health and safety information and training.

3. Business

- **Anti-corruption and anti-bribery**

Our Suppliers are expected to uphold the highest standards of integrity in their business practices, prohibiting any form of bribery, kickbacks, or illicit payments, emphasizing the importance of transparent and ethical conduct. They must adhere to all relevant laws and regulations and have in place anti-corruption policies and procedures to mitigate risks.

- **Fair competition**

Suppliers must conduct their business in compliance with all applicable antitrust and competition laws. They must refrain from engaging in anti-competitive business practices and foster fair play among all participants, preserving the integrity of commercial transactions.

- **International trade compliance**

Suppliers must adhere to all relevant trade regulations, ensuring accurate declaration of goods and compliance with export controls, while refraining from any activities that may violate trade sanctions or embargoes.

- **Conflict of interest**

Suppliers are obligated to transparently address and disclose any potential conflicts that may arise in their dealings with Pricefx and to work with Pricefx in resolving any such conflicts. Additionally, they are required to promptly refrain from actions that may jeopardize the integrity of our partnership.

- **Gifts, hospitality, and entertainment**

Suppliers must avoid giving or accepting gifts, business courtesies or entertainment that might create a sense of obligation to influence a business decision or secure an unfair advantage. Pricefx permits acceptance of reasonable, bona fide meals and entertainment from potential customers or other business partners, so long as they are not excessive and do not suggest any corrupt intent. Any business entertainment or hospitality must be reasonable, aimed solely at maintaining good business relations, and must not be intended to influence Pricefx's decision-making process.

- **Legal and other requirements**

Pricefx Suppliers are required to conduct their operations in strict adherence to all applicable laws, regulations, and standards. It is necessary to uphold, acquire, and regularly renew all relevant certificates, licenses, and registrations. Furthermore, Suppliers should actively stay informed about evolving legal requirements that affect their operations and take necessary actions to ensure ongoing compliance and to demonstrate their dedication to conducting business ethically.

4. Security and protection

- **Data privacy and data protection**

Suppliers are required to respect and protect the privacy of all personal data they handle, in compliance with all applicable data protection laws and regulations and industry standard practices. They should have security policies implemented and must manage their security measures to prevent unauthorized access, use, disclosure, alteration, or destruction of data. Suppliers must only collect, use, and retain personal data for legitimate business purposes, and should ensure that such data is shared only with those who are authorized to access it. In the event of a data breach, Suppliers are expected to promptly notify the affected parties and take appropriate action to mitigate the impact and prevent future occurrences, in all cases as required under applicable law or agreement.

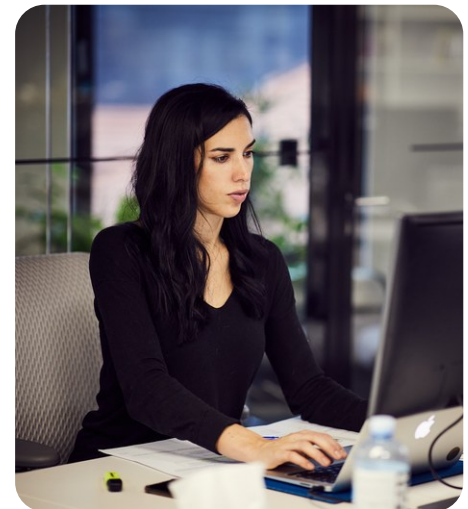
- **Intellectual property and confidentiality**

Suppliers are required to respect and protect Pricefx's intellectual property (including copyrights, patents, trademarks, logos and other intangible assets) and confidential information disclosed by Pricefx or any other third party that interacts with Pricefx. They shall use it only per Pricefx's instructions and safeguard it in compliance with all relevant mandated procedures and agreements.

5. Environment

- **Sustainability**

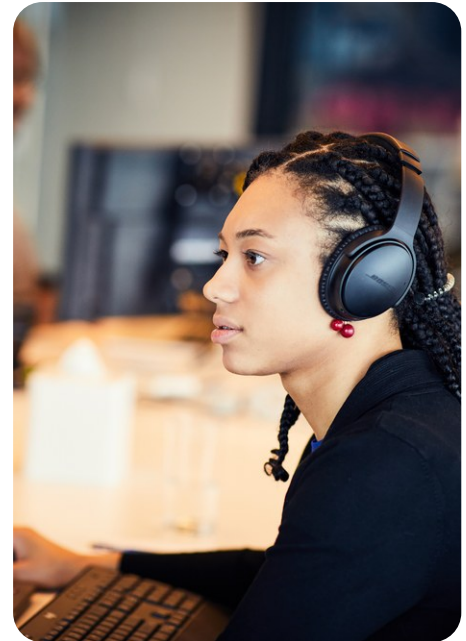
Suppliers are obligated to conduct their operations in an environmentally responsible manner, adhering strictly to all applicable environmental laws and regulations. They should strive to use resources efficiently, minimize waste and incorporate sustainable methodologies in their operations to minimize their environmental footprint. Suppliers are encouraged to continuously improve their sustainability performance by establishing a measurable goal, tracking their progress and being transparent about the results. Any adverse environmental impact caused by Supplier's activities should be promptly identified and mitigated, demonstrating a commitment to environmental stewardship.



6. Management

- **Documentation, recordkeeping**

Suppliers must maintain accurate and comprehensive business records and conduct all transactions transparently and accurately in strict compliance with all applicable legal, contractual, and regulatory requirements (including applicable accounting standards).



7. Reporting and verification

- **Whistleblowing**

Pricefx provides a third-party reporting tool, EthicsPoint (made available by NAVEX Global), and Suppliers are required to submit any Code violations or issues anonymously at www.pricefx.ethicspoint.com. Pricefx prohibits retaliation against those who report issues in good faith and will investigate any reported violations.

- **Compliance verification**

It is mandatory for Suppliers to monitor compliance and keep documentation that demonstrates adherence to this Code. Pricefx reserves the right to verify compliance with this Code from time to time and if any violation or breach is identified, Pricefx will investigate and respond accordingly.

This Code is reviewed regularly, and Suppliers are required to comply with the then-current version of this Code.