



DECODO

# Supplier Code of Conduct

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At Decodo, we are firmly committed to the principles of ethical business conduct, sustainability, and corporate responsibility. This Supplier Code of Conduct (“**Code**”) sets forth the expectations for all organizations that provide goods or services to Decodo and its affiliates. These include vendors, consultants, contractors, agents, and other third-party service providers (“**Suppliers**”).

Suppliers are expected not only to adhere to this Code but also to operate in compliance with all applicable laws and regulations, industry best practices, and in alignment with internationally recognized standards such as the United Nations Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct, the International Labour Organization’s (ILO) conventions, and the Universal Declaration of Human Rights.

# 1

## Human Rights and Labor Standards

Suppliers shall uphold and respect human rights and labor standards across their operations:

- No Forced Labor: All forms of forced, bonded, indentured, or involuntary labor are strictly prohibited.
- No Child Labor: Suppliers shall comply with minimum working age laws and prevent the use of child labor in any operations.
- Fair Treatment and Non-Discrimination: Discrimination based on race, gender, age, ethnicity, sexual orientation, religion, disability, political affiliation, union membership, or other protected status is not tolerated.
- Freedom of Association: Suppliers shall respect the rights of workers to freely associate, join labor unions, and engage in collective bargaining in accordance with local laws.
- Wages and Working Hours: Compensation must meet or exceed legal minimum wage requirements and working hours must comply with applicable laws and regulations.

This includes implementing internal policies that support fair labor practices and regularly auditing their operations to identify and address any potential violations. Suppliers should work proactively to support worker well-being, ensure grievance mechanisms are accessible and effective, and adopt continuous improvement programs.

# 2

## Diversity, Equity, and Inclusion

Suppliers are expected to foster a diverse, inclusive, and respectful workplace:

- Promote equal opportunity in hiring, advancement, and treatment;
- Maintain a workplace free from harassment, bullying, or abuse;
- Ensure anti-harassment policies are in place and enforced, with a clear grievance mechanism available.

This entails not only compliance with legal non-discrimination requirements but also proactive initiatives to promote representation across all levels of employment. Suppliers should take meaningful steps to ensure fair and equitable employment practices, provide opportunities for growth and development, and cultivate a workplace culture that values respect, collaboration, and the contributions of all individuals.

# 3

## Health, Safety, and Working Conditions

Suppliers shall provide a safe and healthy work environment:

- Comply with all applicable occupational health and safety laws and standards;
- Implement preventive and corrective measures to manage risks;
- Provide adequate safety training, personal protective equipment, sanitation facilities, and emergency preparedness plans;
- Allow workers to report unsafe conditions without fear of retaliation.



This includes taking appropriate measures to identify and address potential risks, fostering a workplace culture that prioritizes health and safety, and ensuring preparedness for emergency situations. Suppliers are encouraged to create working environments that support overall well-being, seek and value worker input on safety matters, and respond effectively to concerns or hazards as they arise.

# 4

## Environmental Stewardship

Suppliers are expected to minimize their environmental impact and operate sustainably:

- Establish environmental management systems to monitor and reduce GHG emissions, waste, and resource consumption;
- Promote energy efficiency and transition toward renewable energy where feasible;
- Ensure proper waste management, including recycling, hazardous waste handling, and water treatment.

They shall comply with all applicable environmental regulations and adopt strategies to reduce their carbon footprint, water usage, and overall environmental footprint. Suppliers should set measurable sustainability goals and report on progress transparently. Partnerships with local communities and environmental organizations to support conservation efforts are strongly encouraged.

# 5

## Business Ethics and Integrity

High ethical standards are mandatory for all Suppliers:

- Anti-Bribery and Anti-Corruption: Suppliers shall not engage in or tolerate bribery, extortion, embezzlement, or other corrupt practices.
- Fair Competition: Suppliers shall comply with antitrust and competition laws and avoid collusive practices.
- Conflict of Interest: Suppliers shall disclose any actual or potential conflicts of interest, including personal relationships with Decodo employees.

Suppliers are expected to establish and maintain robust ethics and compliance programs, including employee training, risk assessments, and mechanisms for reporting of misconduct. They shall not only comply with anti-bribery and corruption laws but also promote a culture of honesty, fairness, and accountability in all business activities. Suppliers should also refrain from facilitating any unethical practices through intermediaries or agents.

# 6

## Anti-Money Laundering and Sanctions Compliance

Suppliers shall:

- Avoid any conduct that facilitates money laundering, terrorist financing, tax evasion, or fraud;
- Adhere to international sanctions, export controls, and trade regulations;
- Screen against sanctioned entities and individuals in their operations and supply chain.

They are encouraged to implement appropriate financial controls and know-your-customer (KYC) procedures to detect and prevent suspicious transactions. Suppliers shall conduct regular checks against global sanctions lists and ensure that their operations and partners are not in breach of international laws. Prompt self-reporting of any suspected violations is expected, along with cooperation in any related investigations.

# 7

## Information Security, Data Protection, and Intellectual Property

Suppliers are expected to:

- Safeguard all personal and confidential data in accordance with applicable data protection regulations (e.g., GDPR);
- Implement industry-standard cybersecurity controls and breach response plans;
- Respect intellectual property rights and prevent unauthorized use, reproduction, or distribution of protected materials.

They shall develop, implement, and regularly review comprehensive data privacy policies and cyber risk management frameworks. Suppliers should ensure that access to sensitive information is restricted based on business needs and that all data transfers are secure. Breaches of data security shall be promptly reported to Decodo, with full transparency and cooperation in mitigation efforts.

# 8

## Monitoring and Compliance

Decodo reserves the right to:

- Conduct audits, assessments, or site visits to verify compliance with this Code;
- Request documentation and responses from Suppliers related to compliance;
- Require corrective actions where non-compliance is identified.

Suppliers are expected to facilitate full access to relevant facilities, documents, and personnel as needed during such evaluations. A spirit of transparency, accountability, and partnership is essential to ensuring ongoing compliance and mutual trust. Non-compliance may lead to remediation requests, suspension, or termination of the business relationship, depending on the severity and persistence of the violations.

# 9

## Reporting and Whistleblower Protection

Suppliers are encouraged to raise concerns or suspected violations of this Code through Decodo's reporting mechanisms, including the anonymous 'Speak Up' channel on our website or by sending a notice to [speakup@decodo.com](mailto:speakup@decodo.com). All reports will be handled with appropriate confidentiality and in good faith. More information on the whistleblower protection process can be found in the [Whistleblower Protection Policy](#), which outlines the rights and protections afforded to all reporters.

# 10

## Continuous Improvement and Collaboration

Decodo values long-term partnerships and is committed to working collaboratively with Suppliers to improve standards and practices. Suppliers are encouraged to regularly assess their operations and adopt best practices in human rights, environmental sustainability, ethical behavior, and risk management.