

1. OUR CODE

- a. The purpose of this Supplier Code of Conduct (Code) is to set out our expectations and requirements for all suppliers providing goods and services to Simpro and its affiliated companies (we, us, our).
- b. All of our suppliers have a responsibility to monitor compliance with this Code and to notify us of any breaches. Suppliers must also take reasonable steps to address, remedy and prevent repetition of any breach of this Code or possible breaches of this Code.
- c. We reserve the right to undertake due diligence and risk assessments to verify compliance with our Code and expect our suppliers to cooperate and provide supporting evidence as we may reasonably require to monitor and review their compliance.

2. USE OF THIS CODE

- a. All new and existing suppliers are required to comply with our Code and demonstrate their commitment to doing so.
- b. Suppliers who engage subcontractors when providing goods or services to us must make them aware of our Code.
- c. Compliance with our Code will be used as part of our supplier evaluation, selection and vendor management process.
- d. When a supplier does not meet our requirements, corrective action plans will be established and monitored for progress. We will terminate the relationship with suppliers that repeatedly and knowingly violate our Code.

3. YOUR CONDUCT

- a. We require our suppliers to comply with all applicable laws and, in all cases, to meet the standards and principles set out in this Code across all areas of their business.
- b. Ethics, anti-bribery and corruption, and sanctions
Our suppliers must:
 - i. comply with all applicable laws relating to the prevention of bribery, corruption, fraud, tax evasion or similar activities;
 - ii. look to identify and report any conflicts of interest, be it competing personal or professional interests. Our suppliers

- will avoid even the appearance of conflicts of interest in their work with us;
- iii. respect intellectual property rights and act in a manner protecting intellectual property rights;
 - iv. in all dealings with us, not engage directly or indirectly in trade activities or include in the supply chain any goods or services sourced from sanctioned persons, countries or organisations; in accordance with all sanctions laws with which we must comply, including local or regional sanctions as mandated by the Government for the relevant jurisdiction applicable to us; and
 - v. protect the privacy of personal information of everyone with whom they do business.
- c. Diversity and inclusion
- i. Our suppliers must comply with all applicable discrimination laws and promote diversity and inclusion within their own workplace. This includes recruitment, retention and promotion practices.
 - ii. In particular, our suppliers will not discriminate based on race, colour, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, veteran status or body art.
- d. Health and Safety
- i. Our suppliers must comply with all applicable health and safety laws and aim to create a safe working environment for its employees and anyone else affected by their businesses.
 - ii. Our suppliers will provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage and eating facilities. If our suppliers provide workers with residential facilities, those facilities will be clean and safe, with adequate personal space, entry and exit privileges, emergency egresses, heating and ventilation, and hot water for showering.
- e. Labour
- i. Our suppliers must not use or permit any form of forced, bonded or indentured labour. Suppliers must not

- unreasonably restrict workers' freedom to move into, out of or at working facilities.
- ii. Our suppliers must never use child labour, and ensure that workers under the age of 18 do not perform work that is likely to jeopardise their health or safety, including night shifts and overtime.
- iii. Our suppliers must not permit harassment, abuse, corporal punishment or inhumane treatment.
- iv. Our supplier's workers must be permitted to associate freely, bargain collectively and seek representation in accordance with local laws.
- f. Human rights
 - i. Our suppliers, whether directly or through their supply chain, must comply with all applicable human rights related laws in respect of their employees.
 - ii. They must conduct their business activities in a manner which respects human rights and must not hold another person in slavery or servitude, employ, engage or otherwise use forced or compulsory labour, trafficked labour or child labour.
 - iii. They must have in place adequate procedures to identify, prevent, mitigate and account for modern slavery and other human rights impacts in their operations and supply chains.
- g. Environmental and Sustainability
 - Our suppliers must:
 - i. comply with all applicable environmental laws and continually strive to improve their sustainability performance, focusing on reduction (as appropriate) of waste, carbon emissions, water and natural resources consumption;
 - ii. work to reduce consumption of resources, track and seek to improve energy efficiency, energy consumption and greenhouse gas emissions;
 - iii. monitor, treat and reduce hazardous air emissions, wastewater and waste generated from its operations; and
 - iv. comply with our specific requirements restricting use of specific substances notified from time to time.

4. QUESTIONS

If you have a question about proper conduct or the content of this Code, you should immediately contact our General Counsel at general.counsel@simprogroup.com.