

Supplier Code of Conduct **Bluecrux**

Version:	V1
Publishing date:	30 October 2025
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Confidentiality level:	PUBLIC (P)

Version	Date	Author	Version history
0.1	26 September 2025	JSE	First draft
0.2	02 October 2025	JSE	Finetuned various sections to simplify, clarify and strengthen
1.0	30 October 2025	JSE	Finalization of first version

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Supplier Code of Conduct

Executive Summary

This Supplier Code of Conduct sets out the standards we expect from all our suppliers, including subcontractors, IT service providers, and office supply vendors. It reflects our commitment to conducting business responsibly and in line with our values.

Suppliers are expected to comply with all applicable laws and meet the minimum standards outlined in this Code.

These include:

- Respecting **human rights and fair employment** practices.
- Promoting **diversity, equity, inclusion, and supplier diversity**.
- Ensuring **health, safety, and well-being in the workplace**.
- **Protecting the environment**, including measuring carbon emissions and sourcing responsibly.
- **Conducting business ethically**, free from corruption or bribery.
- **Safeguarding confidentiality, personal data, and information security**.

We also encourage suppliers to go further, by setting measurable goals, validating their carbon emissions, and aligning with recognized international standards and initiatives. These may include the UN Sustainable Development Goals (SDGs), the Science Based Targets initiative (SBTi), the UN Global Compact, International Labour Organization (ILO) conventions, ISO certifications, or other credible sustainability and ethical business frameworks.

Compliance with this Code is a condition of doing business with us, and supplier performance will be reviewed against these standards. Together, we can build a responsible and sustainable value chain.

Purpose and Scope

As a company, we rely on trusted partners to deliver high-quality services and goods. This Supplier Code of Conduct sets out our expectations for all suppliers and subcontractors. It ensures that business relationships are conducted responsibly, ethically, and in alignment with our company values.

We recognize that no company or supplier can achieve perfection across all areas of responsibility. What matters is a shared commitment to continuous improvement, transparency, and striving for the highest possible standards. These expectations extend equally to ourselves as a company: we hold our suppliers to the same values that we apply in our own operations.

This Code applies to all suppliers, including, but not limited to, subcontractors, IT service providers, and office supply vendors. Supplier selection, onboarding, and ongoing evaluation will take into account compliance with the principles and criteria outlined in this Code. Compliance with this Code is a condition of doing business with us.

Suppliers are expected to maintain appropriate policies, procedures, and training programs to embed the standards of this Code into their day-to-day operations and culture.

Compliance with Laws and Regulations

Minimum expectations

Suppliers are required to:

- Operate in full compliance with applicable local, national, and international laws.
- Respect labor, tax, data protection, environmental, and intellectual property laws relevant to their services.
- Ensure that any subcontractors they engage also comply with applicable laws and this Code.

Ethical Business Practices

Minimum expectations

Suppliers are required to:

- Conduct business with integrity, honesty, and transparency.
- Avoid all forms of corruption, bribery, extortion, and conflicts of interest.
- Compete fairly and not engage in anti-competitive behavior.
- Respect the confidentiality of information shared during the course of business.

Encouraged practices

Suppliers are encouraged to:

- Align with the UN Global Compact principles on anti-corruption.
- Disclose relevant information on ownership, governance, and supply chains to promote transparency.
- Foster a “speak-up” culture that empowers employees to raise ethical concerns.
- Carry out due diligence on their own key business partners, agents, and subcontractors to prevent corruption, fraud, or unethical conduct further down the chain.

Labor and Human Rights

Minimum expectations

Suppliers are required to:

- Actively prevent the use of forced, bonded, or child labor by implementing effective policies and due diligence processes to identify, address, and remediate risks in their own operations and supply chains
- Provide safe, fair, and respectful working conditions.
- Ensure fair employment practices, including fair pay, working hours, and legally mandated benefits, in line with applicable laws or industry standards, whichever offers greater protection.
- Respect workers' rights to lawful association and collective bargaining.
- Respect all internationally recognized human rights and implement due diligence processes in line with the UN Guiding Principles on Business and Human Rights to identify, prevent, and mitigate risks within their operations and supply chains.

Encouraged practices

Suppliers are encouraged to:

- Adopt policies aligned with International Labour Organization (ILO) conventions.
- Report transparently on labor practices and workforce well-being initiatives.

Diversity, Equity, and Inclusion (DEI)

Minimum expectations

Suppliers are required to:

- Comply with all applicable anti-discrimination and equal opportunity laws.
- Provide equal opportunities for employment, development, and advancement regardless of race, gender, age, disability, sexual orientation, religion, or other protected characteristics.
- Ensure equal pay for equal work, and regularly review compensation practices to prevent pay discrimination.
- Maintain policies and procedures to prevent harassment, discrimination, and bullying.
- Ensure employees have access to effective grievance mechanisms for DEI-related issues.
- Promote supplier diversity by considering and encouraging diversity in their own supply chains (Tier 1 and Tier 2).

Encouraged practices

Suppliers are encouraged to:

- Promote diverse representation across leadership, management, and operational teams.
- Support accessibility and inclusive practices in operations and service delivery.
- Align efforts with UN SDG 5 (Gender Equality) and SDG 10 (Reduced Inequalities).

Health and Safety

Minimum expectations

Suppliers are required to:

- Provide safe and healthy working environments for all employees, contractors, and visitors.
- Regularly assess health and safety risks and implement appropriate preventive and corrective measures.
- Comply with all applicable occupational health and safety laws and standards.

Encouraged practices

Suppliers are encouraged to:

- Implement proactive well-being programs (mental health, ergonomic design, flexible working).
- Adopt structured health and safety management systems (e.g., ISO 45001 or equivalent).
- Conduct regular internal and/or external audits to evaluate health and safety performance.

Environment and Sustainability

Minimum expectations

Suppliers are required to:

- Comply with all applicable environmental laws, regulations, and industry standards.
- Measure and monitor carbon emissions from operations, at a minimum covering your most material sources, such as direct energy use, business travel or equivalent relevant activities.
- Reduce environmental impact through efficient use of energy, water, and raw materials.
- Minimize waste and promote recycling where feasible.
- Source materials responsibly, avoiding deforestation, illegal logging, or unsustainable extraction practices.
- Notify us promptly of any environmental incidents that could impact our business relationship.

Encouraged practices

Suppliers are encouraged to:

- Report carbon emissions using recognized frameworks such as the GHG Protocol, including Scope 1 and Scope 2, and working towards Scope 3 where feasible.
- Use recognized standards or third-party services to validate carbon emissions data, ensuring that reporting is accurate and reliable;
- Set measurable targets to reduce greenhouse gas emissions in line with the Paris Agreement.
- Support the achievement of relevant UN Sustainable Development Goals, particularly:
 - SDG 12 (Responsible Consumption and Production)
 - SDG 13 (Climate Action)
- Reduce the use of single-use materials and promote sustainable & circular resource management, including packaging where relevant.
- Assess climate-related risks and opportunities (e.g., physical risks from extreme weather, or transition risks from regulation and market shifts) and develop climate transition plans to guide adaptation and alignment with a low-carbon economy.
- Publish sustainability commitments and progress reports where feasible.

Data Protection and Information Security

Minimum expectations

Suppliers are required to:

- Comply with all applicable data protection and privacy laws (e.g., GDPR) and relevant security standards.
- Implement appropriate technical and organizational measures to safeguard confidentiality, integrity, and availability of data (e.g., encryption, access controls, MFA).
- Manage data responsibly throughout its lifecycle, including retention, secure deletion, backup and recovery processes, and ensuring data portability where legally required.

Encouraged practices

Suppliers are encouraged to:

- Align with recognized standards such as ISO/IEC 27001 or equivalent.
- Conduct regular security audits and provide assurance reports upon request.
- Disclose data storage locations and ensure data sovereignty requirements are respected.
- Continuously improve data governance practices and transparency around data use.

Quality and Service Delivery

Minimum expectations

Suppliers are required to:

- Consistently deliver products and services that meet agreed contractual requirements, timelines, and service levels.
- Maintain competent and adequately trained personnel, appropriate tools, and sufficient resources to ensure reliable service delivery.
- Proactively communicate potential risks or issues that may affect quality or timely delivery, and collaborate on mitigation measures.

Encouraged practices

Suppliers are encouraged to:

- Implement processes and systems to monitor performance and drive continuous improvement.
- Adopt formal quality management systems (e.g., ISO 9001 or equivalent) where feasible.
- Share innovations and efficiency improvements that can enhance the value, sustainability, or resilience of services provided.
- Provide sustainable and socially responsible alternatives where possible.

Whistleblowing and Reporting Concerns

Minimum expectations

Suppliers are required to:

- Maintain a whistleblowing mechanism that allows their employees and subcontractors to raise concerns confidentially and without fear of retaliation.
- Ensure that whistleblowing channels cover corruption, human rights, labor conditions, health & safety, and environmental breaches.

Encouraged practices

Suppliers are encouraged to:

- Share aggregated, anonymized reports on whistleblowing cases and how they were resolved.
- Provide training to staff on how to use whistleblowing channels safely and effectively.

We also provide our own contact point for suppliers to raise concerns about ethical, legal, environmental, or compliance issues related to our business relationship. All reports will be taken seriously and investigated appropriately.

Monitoring and Compliance

- We reserve the right to assess supplier compliance with this Code.
- Non-compliance may result in corrective actions, suspension of contracts, or termination of the business relationship.
- Suppliers are required to cooperate with any reasonable request for information or documentation.
- Ongoing supplier evaluation will take into account both minimum compliance and efforts towards the encouraged practices set out in this Code.

Review and Updates

This Supplier Code of Conduct will be reviewed at least every two years to ensure that it remains current, relevant, and aligned with legal requirements, international standards, and our company values.

Suppliers will be notified of any material changes to this Code and are expected to comply with the updated version as a condition of continuing our business relationship.

We acknowledge that progress in areas such as sustainability, diversity, and human rights is a continuous journey rather than a fixed destination. We encourage suppliers to be transparent about challenges as well as achievements, and we commit to doing the same in our own business. We also invite suppliers to collaborate with us in the review process, by sharing insights and best practices, so that together we can make this Code progressively more ambitious and impactful.