

**CODE OF CONDUCT FOR  
PARTNERS AND SUPPLIERS****Introduction**

This Code of Conduct for Partners and Suppliers applies to any organization that: (i) supplies goods or services to Celfocus, (ii) is contracted for the purpose of providing services to Celfocus' customers, or (iii) establishes a business relationship with Celfocus, including partnership and resale relationships.

**General Principles**

Celfocus partners and suppliers must support Celfocus's commitment to do not only what is good for the business, but also what is good for Celfocus's people and the communities in which they live and work.

Celfocus expects its partners and suppliers to have a solid understanding of the legislation in force in the regions where they operate or conduct business, and to implement the necessary processes to comply with them.

All partners and suppliers must adhere to these standards in their business operations. They must create and reinforce policies that comply with the guidelines of this Code of Conduct for Partners and Suppliers, and must also implement similar standards in their own supply chains.

Violations of this Code of Conduct for Partners and Suppliers are considered serious and must be reported immediately. Such violations may result in actions such as audits of the organization or value chain, recommendation or requirement of correction plans, or even classification of the partner and/or supplier as non-preferred, and, in extreme cases, termination of the contract.

**Human Rights**

- Partners and suppliers must treat all their employees, partners and suppliers with dignity and respect, and not subject them to degrading conditions.
- Partners and suppliers must promote a culture that does not tolerate harassment, in any form, or any retaliation for reporting harassment situations.
- Partners and suppliers must not use forced labor, threaten or coerce their employees. Work must be performed based on freely agreed terms. Partners and suppliers may not withhold, destroy, hide or confiscate worker identification documents, nor charge any recruitment, travel or migration fees to non-professional migrant workers.
- Partners and suppliers cannot use child labor, and must not employ anyone under the age of 15 or below the minimum legal working age, whichever is greater. For workers under the age of 18, employment must not prejudice compulsory education and must not present risks to their health, safety or morals due to the nature of the work or the circumstances in which it is carried out.
- Partners and suppliers must promote a culture of equal opportunities for all, and must not tolerate discrimination based on sex, race, religion, age, disability, gender identity, sexual orientation, or any other category protected by applicable legislation. All job applicants and workers must be

## CODE OF CONDUCT FOR PARTNERS AND SUPPLIERS

evaluated based on their competencies to perform the job.

- Partners and suppliers must take into account the applicable standards in relation to the working conditions of all their workers, and must also promote safety and health in the work environment and take the necessary precautions to prevent accidents and injuries.
- Partners and suppliers must promote an environment where business standards are clearly perceived and where there are open channels for individuals to communicate openly with management without threats of retaliation, intimidation or harassment.
- Partners and suppliers must respect workers' legal rights to freedom of association and must not prevent them from legally organizing and joining associations.

### Environment

Partners and suppliers must promote resource efficiency and reduce consumption, including raw materials, energy, water and fuel. Celfocus expects its partners and suppliers to make reasonable efforts to reduce or eliminate the levels of waste they produce, both solid and liquid, preferring alternatives to disposal in landfills, such as reuse and recycling, and must also take reasonable measures to minimize emissions of greenhouse gases and toxic and hazardous pollutants. Additionally, partners and suppliers are encouraged to develop and implement environmentally friendly practices and innovations to minimize negative impacts on the environment.

### Integrity, ethics and anti-corruption

Celfocus is aware of the centrality of its role in promoting and defending ethics in relations between the public sector and the private sector, as well as in commercial relations within the private sector, and is actively committed to combating corruption, seeking to promote a transversal culture business based on the basic values of **legality, loyalty, trust and ethics**.

In this sense, we have adopted a **zero tolerance** policy towards all forms of corruption and, consequently, we have approved a set of internal rules and procedures designed to prevent and detect behavior that may indicate acts of corruption or related offenses.

#### Integrity

Partners and suppliers must not engage in illegal or unethical activities and must promote fair business standards and practices. They must also establish a confidential reporting process so that their own employees, partners and suppliers can report incidents of unethical behavior.

Our Partners and Suppliers must ensure that their accounting records are transparent and reflect all transactions they complete with or on behalf and/or representation of Celfocus.

#### Corruption/bribery/financial crimes

Partners and suppliers must have reasonable practices to prevent all forms of bribery and must support all anti-corruption efforts. Partners and suppliers must not undertake or

**CODE OF CONDUCT FOR  
PARTNERS AND SUPPLIERS**

support third parties in any money laundering, terrorist financing or other financial crime activities.

**Gifts, entertainment and hospitality contrary to customs and customs**

Partners and suppliers shall not offer, accept or solicit any gift, entertainment or invitation when there is reason to believe, or a reasonably informed third party may conclude, that there may be an intention to unduly influence business decisions or be perceived to have influenced business decisions or that may harm the objectivity of the business.

**Conflicts of interest**

Partners and suppliers must have mechanisms to identify, prevent and manage situations of conflicts of interest. Partners and suppliers must ensure that they have mechanisms in place that prevent bias, conflicts of interest or inappropriate influences from influencing their professional decisions and responsibilities. Partners and suppliers must voluntarily report any conflict involving Celfocus employees.

**Due Diligence**

If partners and suppliers use third-party intermediaries to carry out, even partially, the tasks entrusted by Celfocus, they must previously conduct due diligence to ensure that such intermediaries provide legitimate services and respect the principles, rules and procedures described in this Code of Conduct for Partners and Suppliers.

**Report Violations**

To report questionable behavior or possible violations of this Code of Conduct for Partners and Suppliers, you must contact the Celfocus person responsible for your contract. If this is not possible or appropriate, you must report the incident on the Novabase Group companies' reporting portal at [www.novabase.com](http://www.novabase.com).