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**PUBLIC**

# SUPPLIER CODE OF CONDUCT

VERSION 1.1

<b>SUPPLIER CODE OF CONDUCT</b>	
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## 1 PURPOSE, SCOPE AND USERS

To achieve our objectives and ensure ethical conduct, it is crucial that our suppliers align with our values and vision, thereby elevating sustainability standards throughout our supply chain. We recognize that the long-term sustainable development of our suppliers is vital to our mutual success. We highly value our relationships with suppliers who share our approach and vision for conducting business.

In line with this commitment, we have developed a Supplier Code of Conduct ("the Policy"). This Policy extends our core values and applies to all our suppliers. We expect our suppliers to operate in accordance with the principles outlined in this Policy and to adhere to all applicable laws and regulations. This Policy goes beyond mere legal compliance by drawing upon internationally recognized standards to identify and define global best practices.

This Policy details our expectations regarding ethics, business integrity, human rights, health and safety, environmental protection, community engagement, and the quality of services and operations.

## 2 THE PRINCIPLES

At Allshares, we are unwavering in our commitment to always do the right thing for our clients, our people, and our communities. This commitment extends to our dedication to social impact and our pursuit of sustainability across all functions, including sourcing and procurement.

Through this Policy, we aim to make our operations more sustainable by:

- Upholding the laws and regulations of the countries in which we operate.
- Endorsing the highest standards of economic, social, ethical, and environmental practices.
- Identifying and mitigating risks associated with our procurement process.
- Communicating this Policy with both internal and external stakeholders, and raising awareness among our suppliers.

In line with our commitment to the highest standards, we expect our suppliers to aspire to these same standards in their business operations.

### 2.1 Business Ethics

- Obey all relevant international and domestic laws regarding ethical business practices
- Demonstrate existence of procedures to prevent:
  - Money laundering
  - Fraud, bribery, corruption
  - Conflicts of interest
  - Data privacy and security issues
  - Misuse of AI

## 2.2 Labor and Human Rights

- Comply with all applicable laws, in accordance with the principles of the International Labor Organization, the UN Global Compact and the UN Universal Declaration of Human Rights
- Prohibit slavery and the use of forced, bonded, or child labor across the supply chain
- Prohibit unlawful discrimination and harassment to provide a safe and inclusive work environment
- Promote diversity, equity and inclusion

## 2.3 Community Development

- Provide employees with a living wage, at a minimum
- Partner with the local governments and communities to improve the education, cultural, economic, and social well-being of communities which they operate in
- Promote the inclusion of small and diverse businesses in the procurement process
- Consider the societal impact of the AI system

## 2.4 Environment

- Comply and adhere to all the applicable environmental laws in respective countries/jurisdiction
- Undertake initiatives to promote greater environmental responsibility such as:
  - Responsible waste management and disposal
  - Reduction of greenhouse gas and other emissions harmful to the environment
  - Conservation of non-renewable natural resources

# 3 IMPLEMENTATION OF POLICY

## 3.1 Applicability and Implementation

We understand that our suppliers fall under different categories in terms of their scale, the product/service they supply, their organization structure and geographies of operation.

Keeping these factors in mind, we have designed the Policy in a manner that it works for the whole supplier base, although the level and type of compliance will vary depending on the type of the supplier and the principles applicable to them.

We expect our suppliers to set in place internal policies, governance structures, systems, processes and take any other relevant measures to ensure adherence with this Policy. The suppliers are expected to disclose to us the goals set by them and the measures undertaken by them for each of the various principles underlined in this Policy. We will work with our suppliers to identify issues that do not meet our expectations and help them in addressing the gaps identified, if any.

## 3.2 Monitoring and Reporting

We encourage our suppliers to review this Policy and ensure that the principles and practices outlined in the Policy will be reflected in your on-going business dealings with us.

We expect our suppliers to monitor and report the initiatives undertaken by them with regards to ensuring adherence to this Policy. We recommend our suppliers to place monitoring and reporting

mechanisms and management systems, wherever required to effectively implement and manage such initiatives. The suppliers should focus on continuously improving their performance with regards to compliance with this Policy.

We expect our suppliers to communicate the Policy throughout its organization as appropriate.

### **3.3 Reporting on Breaches**

We support and encourage those who report actual or suspected breaches without any fear of retaliation. Any failure to comply with this Policy (including any failure by a team member of Allshares or anyone acting on behalf of Allshares to so comply), of which the supplier is aware, should be immediately reported through our anonymous whistleblower process in writing to [whistleblowing@allshares.com]. Strict confidentiality will be maintained. The failure to do so will be a breach of this Policy.

## **4 ADDITIONAL INFORMATION**

We recognize the critical role our suppliers and partners play in achieving our goals for a more sustainable procurement process. By working together, we can cultivate a supply chain that prioritizes ethics, social responsibility, environmental stewardship, and high quality.

Our valued suppliers and partners may also be required to comply with our comprehensive policies listed below, which may be an integral part of your agreement with us:

- Code of Conduct and Ethics
- ESG Commitments and Policy
- Anti-Corruption and Sanctions Policy
- Supplier Compliance Policy
- Data Protection Policy
- Responsible Use of AI Policy

## **5 ACCEPTANCE OF THE POLICY**

Allshares reserves the right to update this Policy without prior notice. Although key suppliers and partners will be notified of new versions, you are responsible for regularly reviewing this Policy for changes. Your continued partnership with Allshares constitutes your acceptance of these changes.

## **6 DEVIATION TO THIS POLICY**

The principles set out in this Policy are the basis of a constructive and fair professional relationship between Allshares and its suppliers.

Any deviation from these principles could affect this relationship in a detrimental way. Conversely, any action, policy or commitment that tends to reinforce these principles is likely to foster this relationship.

## **7 VALIDITY AND DOCUMENT MANAGEMENT**

The current version of this Policy is effective as of the last update set out in the Change History.

The owner of this document is the Chief Risk and Compliance Officer, who will periodically review it to ensure it continues to help us progress towards our vision and, if necessary, update the Policy as appropriate.

## 8 CHANGE HISTORY

Date	Version	Created by	Description of change
10/01/2025	1.0	Rosanna Bärman Hery Andrianjafy	Basic document outline
03/01/2025	1.1	Hery Andrianjafy	Add reference to ESG Policy and societal impact of AI system and make it "Public"