



# **BCS Code of Conduct for Business Partners**

# BCS Code of Conduct for Business Partners

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## TABLE OF CONTENT

1. PURPOSE.....	1
2. SCOPE OF APPLICATION.....	1
3. GENERAL REQUIREMENTS.....	1
I. INTEGRITY IN BUSINESS CONDUCT.....	1
i) Prevention of Corruption and Money Laundering.....	1
ii) Antitrust Laws.....	2
iii) Conflict of Interest.....	2
iv) Personal Data Security and Data Protection.....	2
v) International Sanctions.....	2
II. HUMAN RIGHTS AND WORKING CONDITIONS.....	2
III. HEALTH AND SAFETY.....	3
IV. ENVIRONMENTAL RIGHTS.....	3
4. REPORTING OF POTENTIAL MISCONDUCT.....	4
5. TERMINATION FOR NON-COMPLIANCE.....	3



## BCS Code of Conduct for Business Partners

### 1. PURPOSE

BCS Data Centres Limited and its global subsidiaries, are dedicated to upholding the utmost level of integrity. Prioritising the safeguarding of human and environmental rights, we consider it our responsibility to adhere to internationally recognised ethical standards and conduct ourselves with unwavering integrity.

BCS Data Centres Limited aims to translate the principles outlined below into tangible realities. To this end, our Code of Conduct for Business Partners, which includes our suppliers, clients, sub-contractors and associated companies, incorporates a comprehensive set of minimum requirements that our Business Partners are expected to adhere to, encompassing, but not limited to:

- adhering to all relevant national and international laws;
- demonstrating a commitment to tackling corruption, preventing money laundering and antitrust law violations, and complying with data protection laws and international sanctions;
- upholding human rights and ensuring the health and safety of employees are respected and protected; and,
- safeguarding the environment in all business activities.

BCS Data Centres Limited urges its Business Partners to respect the following requirements and to continuously improve their business operations in these areas.

### 2. SCOPE OF APPLICATION

This Code of Conduct for Business Partners is an integral part of the agreement between BCS Data Centres Limited and its Business Partner.

### 3. GENERAL REQUIREMENTS

The Business Partner shall act in compliance with all applicable laws, rules and regulations in their respective countries. BCS Data Centres Limited therefore expects appropriate measures to be taken, suitable management systems to be put in place and regular checks to be carried out to reinforce the Business Partner's commitment to compliance.

#### I. INTEGRITY IN BUSINESS CONDUCT

At BCS Data Centres Limited, we hold ourselves to the highest ethical standards and consistently conduct ourselves with integrity. We extend this expectation to our Business Partners, requiring them to uphold similar ethical standards. Any conduct inconsistent with our ethical principles is deemed unacceptable.

##### i) Prevention of Corruption and Money Laundering

The Business Partner is obligated to refrain from any involvement in corruption and must adhere to all relevant laws and regulations pertaining to bribery, anti-corruption, and the offering of gifts, entertainment, and contributions. It is not permissible for the Business Partner to provide financial or non-financial advantages, whether directly or indirectly, to public officials or third parties with the intent of improperly influencing business outcomes, inducing or rewarding improper conduct, or influencing decisions in commercial, contractual, regulatory, or personal matters.

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## BCS Code of Conduct for Business Partners

Furthermore, the Business Partner is expected to fully comply with applicable laws and regulations governing the prevention of money laundering.

### ii) Antitrust Laws

Antitrust laws aim to foster fair competition by prohibiting practices that unreasonably restrict trade, limit competition, or manipulate prices. BCS Data Centres Limited is dedicated to conducting business in a fair and ethical manner, encompassing a steadfast commitment to compliance with all laws governing anti-competitive practices. This commitment extends to acting with integrity in the marketplace, refraining from obtaining information about competitors through inappropriate means, and abstaining from making false or misleading statements about competitors. BCS Data Centres Limited holds the expectation that our Business Partner will align with these principles.

### iii) Conflict of Interest

A conflict of interest occurs when an individual's private interest interferes (or appears to interfere) with the interests of BCS Data Centres Limited as a whole. The Business Partner shall avoid any activity which may lead to a conflict of interest. Should a conflict of interest nevertheless arise, it must be reported immediately to take appropriate actions.

### iv) Personal Data Security and Data Protection

The Business Partner is required to safeguard confidential data and personal information, ensuring their protection and preventing any unauthorised disclosure to uphold the privacy of our employees and Business Partners. BCS Data Centres Limited adheres to these principles in all regions of operation, and as such, we expect our Business Partner to establish effective security systems and adhere to relevant laws for this purpose.

### v) International Sanctions

BCS Data Centres Limited complies with all applicable sanctions imposed by national and international authorities. Business Partners are expected to act accordingly.

## II. HUMAN RIGHTS AND WORKING CONDITIONS

BCS Data Centres Limited requires that all employees are protected and treated with respect, not only within its own business activities, but also within those of the Business Partner. Our Business Partner shall respect human rights, prevent any kind of human rights violation and provide fair working conditions in accordance with the minimum standards established by applicable rules, including national law and collective bargaining agreements, where applicable. These include, but are not limited to:

- the prohibition of child labour;
- the prohibition of forced labour, including any form of forced or compulsory labour, slavery and modern slavery, human trafficking, servitude, debt bondage, labour exploitation, verbal or physical humiliation, violence or coercion, mental abuse, sexual harassment, threat or intimidation, nor any other abusive working conditions;
- the prohibition of disregarding occupational safety and health obligations;
- taking measures to prevent excessive physical and mental fatigue, in particular through inappropriate division and distribution of duties in terms of working hours and rest breaks;
- respect the right to freedom of association, as well as collective bargaining;

Policy Owner: BCS Compliance Officer	Release Date: 1 <sup>st</sup> of February 2026	Version: 1.0	Management
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## BCS Code of Conduct for Business Partners

- the rejection of any form of discrimination, including but not limited to personal characteristics such as gender, sexual orientation, nationality, ethnic origin, social background, race, religious or philosophical beliefs, disability, age, political opinion, physical or mental disease, or any other forms of discrimination and harassment in the working environment;
- the provision of an adequate living wage (payment of salaries and benefits at least equal to the country's minimum salaries);
- the prohibition of unlawful eviction and the prohibition of unlawful taking of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person; and,
- the use of responsible security practices.

The Business Partner shall refrain from any act that might cause harm to a protected human right.

### III. HEALTH AND SAFETY

Ensuring the health and safety of our employees remains a paramount concern, and we extend the same priority to our Business Partners. Business Partners are required to implement safety precautions to prevent any harm to employees and establish a secure work environment.

BCS Data Centres Limited anticipates that our Business Partner will create appropriate working conditions, including those for trainees and temporary staff, in accordance with all applicable national and international laws. Additionally, Business Partners should regularly assess health and safety risks, implementing and updating preventive measures as needed. This involves providing suitable controls and procedures to mitigate health risks, including mental fatigue resulting from a lack of rest, along with offering regular training for all employees. Emergency processes should be periodically reviewed and updated, with special attention given to preventing biological, chemical, and machinery-related harm.

### IV. ENVIRONMENTAL RIGHTS

BCS Data Centres Limited places a significant emphasis on responsible environmental practices. Acknowledging the environmental impact associated with our business activities, we are dedicated to the conscientious and sustainable utilisation of natural resources. Consequently, BCS Data Centres Limited expects a similar commitment to sustainability from our Business Partners. At a minimum, the Business Partner is required to adhere to all relevant national and international environmental regulations and standards.

Recognising the imperative to minimise environmental pollution and continually enhance environmental protection efforts, BCS Data Centres Limited emphasises that the Business Partner shall prudently and responsibly manage chemicals and pollutants throughout the entire supply chain. This management should align with all applicable national and international laws, extending to the proper handling of (chemical) waste.

Policy Owner: BCS Compliance Officer	Release Date: 1 <sup>st</sup> of February 2026	Version: 1.0	Management
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## BCS Code of Conduct for Business Partners

### 4. REPORTING OF POTENTIAL MISCONDUCT

The Business Partner, including its employees, as well as other stakeholders are encouraged to report any suspected violations of applicable laws or of the Code of Conduct for Business Partners to:

- BCS Data Centres Limited Board of Directors or,
- RSBG UK Compliance [compliance@rsbguk.com](mailto:compliance@rsbguk.com), or
- Dorsch Global Integrity Line, which is reachable 24/7 <https://dorsch.integrityline.org/>

To ensure that violations are appropriately recorded, we recommend the Business Partner should provide a complaints/grievance mechanism, in line with their own due diligence obligations.

### 5. TERMINATION FOR NON-COMPLIANCE

BCS Data Centres Limited reserves the right to terminate any business relationship with the Business Partner in the event of their non-adherence to the Code of Conduct for Business Partners and/or failure to correct violations or displaying patterns of non-compliance with the standards of the Code of Conduct for Business Partners.

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