

Suppliers Commitment



1. Operate within an ethics and compliance framework
2. Promote and adhere to Health, safety and environment norms
3. Respect Human rights and combat modern slavery
4. Promote an environment free of discrimination and harassment
5. Avoid, disclose and manage conflicts of interest
6. Prevent bribery, corruption and money laundering
7. Anti-competitive conduct and international trade regulations
8. Protect corporate information and intellectual property
9. Cyber Security
10. Speak up

OUR COMMITMENT

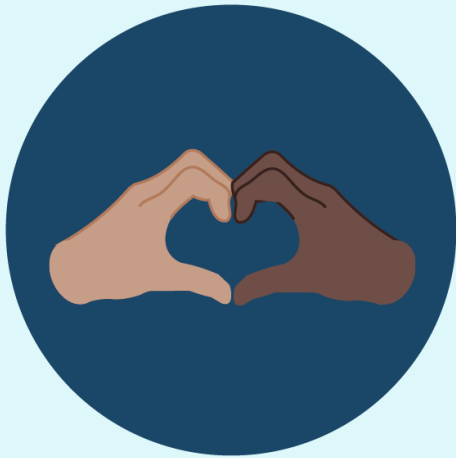
Azule Energy is committed to ensuring respect for internationally recognized human rights, in line with the United Nations Guiding Principles on Business and Human Rights (UNGP) and with the OECD Guidelines for Multinational Enterprises and Voluntary Principles on Security & Human Rights.

We aim to contribute positively to the achievement of the Sustainable Development Goals (SDGs), to support a low-carbon and socially fair energy transition and uphold the Paris Agreement. We intend to involve our Suppliers in this path and develop relationships with Suppliers of proven professionalism, capable of operating according to the highest quality standards and who share our corporate values and principles. In fact, the selection of reliable partners is an essential activity for the value creation for Azule Energy's stakeholders in order to guarantee innovation, continuous improvement and to protect our integrity and reputation. Guided by the principles of our Code of Conduct, and in Azule Energy's Human Rights and Modern Slave policy, we have established this Suppliers Commitment which describes the minimum requirements and expectations that all Suppliers are required to meet, in order to continuously improve their activities and services, optimized by developing, whenever possible, innovative technology.

We strive to build and strengthen our relationship with those Suppliers who share the principles expressed in the Azule Energy Code of Conduct, as also contained in this Suppliers Commitment, and promote their adoption among their people and supply chains. The requirements in this Suppliers Commitment do not replace but they add up to the legal requirements and provisions and to those contained in the contractual commitments between the Suppliers and Azule Energy.

OUR VALUES

We have three unifying cultural principles that represent the “The Azule Energy way”. Azule Energy’s values and behaviors are the foundation of our code and of the expectations that we have regarding the commitment that our suppliers and business partners will uphold.



I Care

- I am open and honest with all
- I support others to reach their goals
- I welcome and value everyone’s uniqueness



I Explore, Innovate and Deliver

- I endeavour to learn, grow and continuously improve
- I listen to new ideas and explore better and more cost-effective ways of working
- I embrace change and collaborate proactively with others to deliver



I am Responsible and Accountable

- I prioritise the safety of myself and others around me
- I strive to make a positive and lasting impact to our mission
- I am mindful of my decisions and ready to correct my mistakes and learn from them

ETHICS AND COMPLIANCE

At Azule Energy, we are dedicated to fostering an ethical culture and ensuring compliance with all applicable laws and regulations, promoting integrity, transparency, and fairness in all our business practices. As such, we require that our suppliers commit to:

- Comply with all applicable international, EU, UK, national, regional and local laws and regulations, including those regarding the execution of the specific contract.
- Foster and embed an ethical culture and business practices that promote safety, integrity, transparency, fairness, and respect.
- Have an effective compliance programme in place to identify and manage all applicable compliance risks on an ongoing basis.

HEALTH, SAFETY AND THE ENVIRONMENT (“HSE”)

Our Suppliers conduct business in a way that supports Azule’s HSE goals of no accidents, no harm to people and no damage to the environment by taking a systematic approach to managing operating activities and HSE risks, complying with applicable HSE laws and regulations, and seeking to continuously improve health, safety and environmental performance.

In order to guarantee everyone’s health and safety, Suppliers identify and assess risks in advance in order to manage and prevent them, providing suitable tools for prevention and protection from any culpable or malicious behavior, including from third parties, which could cause direct or indirect damage to the company's tangible or intangible resources, periodically updating the preventative measures and

GENERAL

using the best available protection technologies and practices.

Suppliers guarantee their top management's full commitment in handling the health and safety matters, as well as training, and in raising workers' awareness on the adoption of a conduct that safeguards health and safety.

Suppliers commit to avoid illegal or dangerous behavior and report any situation that could represent danger.

The workforce and our Suppliers are encouraged to report any accident, injury, illness, or unsafe condition immediately, and stop work that could be unsafe, so that appropriate action can be taken.

With the purpose of protecting environment and promoting environmental sustainability, Suppliers are expected to commit to:

- Acti sustainably, minimize environmental impacts and optimize the use of energy and natural resources;
- Conduct their activities through the responsible use of resources so as not to compromise the needs of future generations, but, rather, promote the respect for the society as a whole;
- Commit to actively participate in the process of risk assessment and environmental protection, in line with the principles of precaution, prevention, protection and continuous improvement;
- Contribute in the achievement of company targets regarding the efficiency of plants and reduction of direct emissions, the promotion of a low carbon impact energy mix and a steady effort in research and development;
- Manage and monitor the environmental aspects relevant to their activities, drawing inspiration from broadly internationally recognized environmental management standards and models;
- Integrate the sustainable environmental principles into their supply chain management (optimization of energy use, of raw materials' use, of land management, of emissions to air, of

GENERAL

consumption and of the impact on water resources and of reduction, reuse and recycling of waste), supporting Azule Energy in the challenging process towards “carbon neutrality” and the circular economy and helping to build a more sustainable development in the interest of the planet.

HUMAN RIGHTS AND MODERN SLAVERY

It is Azule’s expectation that our Suppliers operate with respect to the human rights and dignity of all people and meet the responsibilities of business set out in the UN Guiding Principles on Business and Human Rights. As such, our Suppliers:

- Do not use forced or compulsory labour, human trafficking, child labour, slavery or servitude, with all work being conducted voluntarily, without threat of penalty or sanction and not based on deception. These and other expectations are outlined in Azule’s commitment to human rights.
- Abide by working times and rest periods in compliance with the applicable legislation and in line with international standards.
- Work to ensure that private or public security is provided in a responsible manner, which respects human rights of workers and local communities, as well as human rights defenders.
- Respect workers’ rights to freedom of association and to collective bargaining, within the relevant national legal framework. Be open to alternative means of worker representation and supportive of engagement, where freedom of association and collective bargaining is restricted by law.

CONFLICTS OF INTEREST

Suppliers do not seek to obtain an improper advantage or improperly influence the ability of Azule Energy’s employees to make valid, impartial and objective decisions on behalf of Azule Energy. Suppliers commit to:

- Avoid practices related to the commission or participation in fraud;

GENERAL

- Not seek to obtain an improper advantage or improperly influence the ability of Azure Energy's employees to make valid, impartial and objective decisions on behalf of Azure Energy and refrain from any undue interference with the decision-making process.
- Prioritize the direct contact with Azure Energy, avoiding any type of intermediation and reporting clearly prior to establishing any relationship with Azure Energy's representatives the presence of either contingent or structural situations of this kind in their own modus operandi;
- Ensure utmost transparency of the information needed to develop the procurement processes, including information regarding the company's shareholding structure, the clarity and sustainability of their bids, also in terms of real operational capabilities, refraining from providing false or misleading information, or omitting relevant information likely to influence the decision-making processes related to the qualification, contract award or subcontracting authorization processes.

NON-DISCRIMINATION AND HARASSMENT

We treat everyone with fairness and respect and expect everyone we work with to do the same. Our Suppliers do not:

- Tolerate any unfair discrimination within your workplaces or in hiring, development and career progression.
- Discriminate based on race, ethnicity, national origin, religion, gender, age, sexual orientation, gender identity, marital status, disability, veteran status, or any other characteristic protected by applicable laws.
- Tolerate any physical, verbal or non-verbal forms of abuse or harassment. This includes any unwanted behaviour that could reasonably be considered offensive, intimidating or humiliating, as well as any form of sexual harassment.

BRIBERY,CORRUPTION AND MONEY LAUNDERING

We combat all forms of corruption without exception and, in particular, Suppliers commit to:

GENERAL

- Expressly prohibit the direct or indirect giving, paying, promising or accepting of anything of value to obtain, retain or direct business, to secure an improper advantage or to influence someone including Government Officials to improperly perform their duties.
- Implementing mechanisms that prevent any member of their team from inducing a Government Official or a private party to improperly carry out a public function or any business-related activity, or compensate him for the carrying out of such improper function/activity;
- Not influence any official act (or omission) by a Government Official or any decision that violates any public duty;
- Implementing mechanisms that prevent the inappropriate provision of gifts, entertainment, or meals to Azure personnel or third parties representing Azure. When legitimately required in rare cases, they should be of modest value and appropriately timed and registered.
- Implementing mechanisms that prevent Money laundering, including the act of hiding illegal funds (especially those with possible links to terrorism or criminal activity) or giving such funds apparent legitimacy.

ANTI-COMPETITIVE CONDUCT AND INTERNATIONAL TRADE REGULATIONS

Suppliers commit to adopting free competition practices aligned with principles of loyalty and fairness. Suppliers undertake to adopt and respect the principles of free competition, loyalty and fairness and in no way encourage or tolerate Human Rights violations or other illegal activities, such as money laundering and any form of terrorism financing.

Suppliers shall adopt the necessary measures to conduct their activities in compliance with the applicable export control regulations as well as applicable economic and financial sanctions.

Suppliers shall compete on the basis of their merits and refrain from:

- Any anti-competitive conduct;
- Any deceitful or illicit market behaviour, including agreements or collusive practices with

GENERAL

competitors to fix prices, manipulate tenders, share customers among themselves and/or limit the offer;

- Making any inaccurate statements regarding their own services and products or those of others.

PROTECT CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

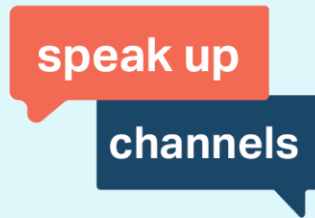
Suppliers shall implement effective protocols for securing and protecting Azure information including:

- Respecting the proprietary and intellectual property rights of Azure and/or third parties, including but not limited to those concerning trademarks, trade names, signs, logos, domain names, distinctive signs, patents, know-how, registered designs, models and copyrights.
- Guarantee the security of the information according to its importance and, where necessary, perform a risk assessment to identify the most appropriate security measures, and adopt industry best practices, on sharing, protecting and securing information.
- Ensure the confidentiality required by the circumstances of all information acquired, in any form, as a consequence of their relationship with Azure Energy and related to information that regards both Azure Energy and third parties, in accordance with the applicable laws, regulations and the contractual provisions, thus observing all data privacy legal requirements on the collection, processing, transfer and conservation of Azure personal data.
- Report any suspected or actual information security incidents that impact Azure information or systems to Azure as soon as practically possible.

CYBER SECURITY

Suppliers shall adopt the necessary measures, whenever applicable, to conduct their activities in accordance with the applicable Cyber Security requirements and to ensure:

- That it is constantly aware of the potential Cyber Security threats related to its type of activities;
- Its employees and subcontractors are made aware of and adhering to the applicable Cyber Security measures and requirements, if any;
- Technical measures and requirements are implemented within its ICT infrastructure to prevent and protect Azure from any type of Cyber Security threats, if any;
- Incident management readiness and on an event of cyber incident that can compromise Azure Information and Reputation, report to Azure in timely manner.
- Suppliers undertake to inform Azure as soon as possible once they have knowledge of an actual or eminent cyber threat.



Suppliers recognize that they play a key role in promoting a “speak-up” culture that does not tolerate retaliation. Suppliers undertake to provide a means for their employees, their suppliers, and their business partners to speak up if they see something that is unsafe, unethical, or potentially harmful involving Azule’s businesses or activities. They may also inform a member of Azule’s management or use Azule’s confidential Safe2Talk help line.

Azule Energy’s reputation represents the consideration and perception that stakeholders have of the company and its activities in relation to the behaviors of Azule Energy resources and the results obtained.

Suppliers are committed to protecting Azule Energy reputation.

With a view to safeguarding such values Azule Energy expects its Suppliers to:

- adopt excellent behaviors;
- refrain from any improper or unauthorized use of the Azule Energy brand;
- be aware that any and all actions they take shall not cause potential damage to Azule Energy’s reputation.

Azule Energy reserves the right to initiate a process of verification of Suppliers’ compliance with the content of this Suppliers Commitment document.

Failure to comply with the principles of this Suppliers Commitment may affect qualification as an Azule Energy supplier and result in Azule Energy’s interruption of its relationship with the specific Supplier depending on the circumstances and the severity of the violation; Violations are analyzed on a case-by-case basis and processed in accordance with all the internal procedures, the agreements and the applicable legal requirements.

GENERAL

speak up

channels

References:

For further information please refer to the following:

- Azure Energy Code of Conduct
- Azure Energy Human Rights and Modern Slavery Principles
- Azure Energy Modern Slavery Statement
- UN Guiding Principles on Business and Human Rights

Reporting channels:

- You can reach Safe2Talk our anonymous reporting channel anytime through the following:
 - Call +244 226 425 519
 - Submit a concern through the website at www.azure-energy.ethicspoint.com



Your direct manager,
Your manager's manager
Any other manager



Legal and Corporate Affairs,
HR, HSE



concerns@azure-energy.com



Safe2Talk an anonymous channel
How to contact Safe2Talk
+244 226 425 519
www.azure-energy.ethicspoint.com

Azule Energy Supplier Commitment Receipt

Date:

Supplier's Name:

Supplier's Address:

Contact Person:

Contact Email:

Contact Phone:

Signature