



# **Outpost24 Supplier Code of Conduct**

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# Version History

Version	Date	Description	Author	Approved by
1.0	2024-10-03	Initial release	Compliance Manager	CFO

# Introduction

Outpost24 is committed to conducting business with integrity, responsibility, and in alignment with the highest ethical standards. We expect our suppliers, business partners, and subcontractors to adhere to these principles in their operations. This Supplier Code of Conduct outlines the standards we expect from those we do business with, to ensure ethical, sustainable, and responsible practices throughout our supply chain.

By doing business with Outpost24, suppliers agree to comply with the principles outlined below.

## Legal Compliance

Suppliers must comply with all applicable laws and regulations, including those related to labor, human rights, health and safety, environmental protection, anti-bribery, anti-corruption, data protection, and intellectual property.

## Human Rights and Labor Practices

Outpost24 is dedicated to upholding human rights and ensuring fair labor practices across all operations. Suppliers must:

- **Prohibit forced or involuntary labor**, including modern slavery and human trafficking.
- Ensure that **wages, working hours, and benefits** comply with local laws and industry standards.
- Respect employees' rights to **freedom of association** and **collective bargaining**.
- Prohibit the use of **child labor** and comply with minimum age laws.
- **Avoid discrimination** in hiring and employment based on race, gender, religion, age, disability, sexual orientation, or any other protected characteristic, fostering a diverse and inclusive workplace.

## Health and Safety

Suppliers must provide a safe and healthy working environment for their employees, ensuring compliance with the following standards:

- Identify and mitigate potential **workplace hazards** through regular risk assessments.
- Implement procedures for **accident and incident reporting** and ensure that employees are aware of emergency protocols.
- Provide appropriate **personal protective equipment (PPE)** and ensure safe working conditions, including ergonomics and equipment safety.
- Address **mental health and well-being** in the workplace by promoting a positive and supportive environment.

- Ensure safety measures for **workplace cleanliness** and **orderliness**.

## Environmental Responsibility

Outpost24 is committed to minimizing its environmental impact and expects the same from its suppliers. Suppliers must:

- Comply with applicable **environmental laws** and regulations.
- Actively work to minimize their **carbon footprint**, reduce energy consumption, and implement practices that promote the efficient use of resources.
- **Manage waste responsibly** and minimize the use of hazardous materials, ensuring proper disposal or recycling of materials at the end of their life cycle.
- Strive for the **use of renewable energy** where feasible and reduce the environmental impact of their operations, particularly in data centers and digital infrastructure.

## Data Privacy and Security

Suppliers must handle data securely and ensure compliance with data protection laws and best practices. Suppliers must:

- **Comply with data protection laws** such as GDPR or other applicable regulations, ensuring that personal and sensitive data is handled securely.
- Implement strong **cybersecurity measures**, including encryption, access controls, and secure data storage, to protect against unauthorized access and breaches.
- **Report data breaches or cybersecurity incidents** promptly and always within the timeframe specified by applicable data protection laws, and cooperate fully on incident response efforts.

## Intellectual Property Protection

Outpost24 expects its suppliers to respect and protect intellectual property rights. Suppliers must:

- Ensure that **Outpost24's intellectual property** and any proprietary information they access are protected.
- Prevent unauthorized use, distribution, or disclosure of Outpost24's proprietary information and respect intellectual property rights in all dealings.

## Ethical Sourcing and Supply Chain Management

Suppliers are expected to ensure that their own suppliers uphold high ethical standards. Suppliers must:

- Ensure that materials and services are sourced ethically, avoiding involvement in **conflict materials** or regions known for human rights abuses.
- Maintain transparency in their **supply chains** and take corrective action if any unethical sourcing practices are identified.

## Anti-Bribery and Anti-Corruption

Outpost24 has a zero-tolerance policy for bribery and corruption. Suppliers must:

- Prohibit any form of **bribery, kickbacks, or facilitation payments**.
- Ensure that **gifts, entertainment, and hospitality** are given or received in good faith, are reasonable, modest, and transparent.
- Maintain accurate **financial records** and prevent any misclassification of expenses that could conceal bribery or corruption.
- Avoid political or charitable contributions that could be interpreted as attempts to influence business decisions.

## Fair Business Practices

Suppliers must engage in ethical business practices, including:

- **Respecting intellectual property rights** and safeguarding confidential information.
- Avoiding **conflicts of interest** and maintaining transparency in all business dealings.
- Engaging in **fair competition** and following lawful procurement processes that are free from undue influence or favoritism.

## Business Continuity and Risk Management

Suppliers must ensure they are able to continue delivering services and products to Outpost24 in case of disruptions. Suppliers must:

- Develop and maintain **business continuity plans** to ensure the continued availability of services or products during events such as natural disasters, pandemics, or cyberattacks.
- Conduct regular **risk assessments** to identify and mitigate potential risks to service continuity.

## Monitoring and Continuous Improvement

Outpost24 expects suppliers to continuously monitor their compliance with this code and take corrective action if any issues arise. Regular self-assessments and audits of their practices should be conducted to ensure adherence to these standards.

Suppliers are encouraged to implement a process of **continuous improvement** in areas such as environmental sustainability, workplace conditions, and ethical conduct, ensuring their operations align with the evolving expectations of the business environment.

## Reporting Concerns

Suppliers must have mechanisms for employees and stakeholders to report concerns or unethical practices without fear of retaliation. Outpost24 encourages prompt reporting of any suspected violations of this Code of Conduct. Suppliers are expected to investigate and take appropriate action to resolve issues that arise.

## Consequences of Non-Compliance

Non-compliance with this Supplier Code of Conduct may result in the termination of the supplier relationship. Outpost24 reserves the right to take appropriate action, including terminating contracts, if there are repeated or serious violations of this code.