

## Introduction

Blacknight are committed to the responsible sourcing of goods and services and this Supplier Code of Conduct sets out our expectations of those who provide these goods and services to us.

The standards below are part of Blacknight's broader commitment to upholding human rights and operating responsibly. This code is informed by a number of international standards and guidance documents, including the UN Guiding Principles on Business and Human Rights and the Core Conventions of the International Labour Organisation (ILO).

Blacknight have undertaken a Human Rights Impact Assessment (HRIA) on our own operations in conjunction with article19.org and the Danish Institute for Human Rights.

This Code of Conduct sets out the minimum standards we expect, and we encourage all suppliers to adhere to these standards. The term '**Supplier**' as used in this code refers to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do, or seek to do business with Blacknight worldwide.

It is expected that suppliers apply similar levels of compliance to their own suppliers or approved sub-contractors with whom they work to supply goods and services to Blacknight. These principles form part of the supplier selection process and are subject to continued monitoring. Where there is a pre-existing relationship with a supplier, the requirements of this code are in addition, and not in lieu of, any legal or contractual agreement between that supplier and Blacknight.

## Business conduct standards

Blacknight has always set high standards for the way we conduct business. In turn, we expect suppliers to conduct business responsibly, with integrity and transparency. Furthermore, we expect suppliers to treat all employees fairly, honestly and with respect, in full compliance with the following requirements

## Human Rights

Suppliers shall not permit child labour to be used in any operation connected with Blacknight. No child below the legal age for finishing compulsory schooling, or 15 years of age (whichever is the greater) may be employed by a supplier, subject to ILO exceptions.

Where young people under the age of 18 are employed, suppliers will ensure that their work is not likely to be harmful to their health and/or development, including no working under hazardous conditions and ensuring compliance with all applicable laws.

- Suppliers must ensure that all employees have the legal right to work and any migrant workers should be in possession of a valid work permit issued by the relevant authority.
- Suppliers shall not permit the use of forced or involuntary labour of any type (i.e. Forced, trafficked, bonded, indentured or involuntary prison labour) and workers shall be free to leave employment without penalty on the provision of reasonable notice.
- The use of physical abuse, verbal or sexual harassment or intimidation of workers shall be prohibited by suppliers.
- Suppliers shall respect the rights of employees to join or refrain from joining worker organisations and will allow workplace access for such organisations to facilitate their representative functions.
- Suppliers shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected characteristics.



- Suppliers shall ensure that their employees are fairly compensated and that, at a minimum, they comply with all applicable wage and hour laws, or industry standards approved on the
- basis of collective bargaining, whichever is higher. Deductions to wages shall only be made in accordance with applicable law or under collective agreement.
- Suppliers must provide for working hours that comply with national laws and industry standards. Total worked hours shall not exceed the maximum allowable under local legislation
- All overtime shall be voluntary and compensated in accordance with applicable laws.
- Suppliers shall not seek to avoid obligations to workers under labour or social security laws and regulations arising from the regular employment relationship through the excessive use of fixed -term contracts, labour-only contracting, sub-contracting, home-working or apprenticeship scheme

## Occupational Health & Safety

- Suppliers to Blacknight shall ensure all employees work within safe and humane conditions, including providing adequate training and effective protective equipment to safely carry out their duties. Suppliers will also provide access to clean toilet facilities, potable water and sanitary facilities for food storage
- Facilities must be constructed and maintained in accordance with applicable laws and regulations and accommodation, where provided, shall be clean, safe and meet the basic needs of workers while respecting their dignity
- Suppliers will also ensure that there are appropriate exits, procedures and equipment in
- place to deal with emergency situations.

## Business Ethics

- In keeping with our commitment to exercising appropriate standards of professionalism and ethical conduct in all business activities, Blacknight will not tolerate bribery or corruption in any form, or any breach of its Anti-Bribery Policy.
- Suppliers and business partners are not permitted to directly or indirectly promise, offer or provide any improper advantage to any person or entity, including officials of a government or a government-controlled entity. Blacknight's employees are not allowed to accept any such advantage and we expect the same approach in business dealings from our business partners, suppliers and third parties.
- Suppliers are expected to maintain accurate records of their activities and performance that clearly demonstrate compliance with all applicable standards, regulations and Blacknight requirements.
- Suppliers must disclose any personal relationships, economic interest or other ties to their business held by an employee or contractor with Blacknight.
- Suppliers shall take appropriate measures to secure and protect all confidential information related to its relationship with Blacknight and use it only for the purpose authorised under contractual agreement. This obligation shall remain in force regardless of the status of the business relationship.
- We expect suppliers to report to Blacknight any concerns about security breaches or as required under EU GDPR regulations to report an actual breach within 72 hours.

## Environment/Land Rights

- Suppliers to Blacknight shall carry out operations with care for the environment and at a minimum will comply with all applicable environmental laws and regulations.

- Blacknight expects suppliers to support its sustainability commitments through the adoption of good operating practices. In particular, suppliers should seek to optimise their use of natural resources and minimise the generation of waste.
- Suppliers shall respect the rights to land tenure of local communities and indigenous peoples impacted by its operations, including its raw material sourcing, and will adhere to the principle of Free, Prior and Informed Consent

## Compliance

- Blacknight expect suppliers to ensure their operations comply with all applicable laws and regulations at a minimum. Furthermore, we expect that all suppliers adhere to Blacknight requirements, including the standards as laid out in this Code of Conduct.
- Suppliers shall have the appropriate processes and systems in place to do so, including a means for the confidential reporting of concerns about misconduct or unethical behaviour and an appropriate mechanism for addressing any issues identified.
- Where issues are identified through internal reporting, whistle-blowers will be protected from any negative repercussions.
- Suppliers shall cooperate with Blacknight to allow us, or any authorised third party, to conduct audits to verify compliance with these standards or other required certifications. In the event deficiencies are identified, the supplier will take the steps necessary within an acceptable timeframe to correct any deficiency to Blacknight's satisfaction.
- Suppliers shall immediately report any concerns about compliance with legal requirements or any aspect of this code, to their designated point of contact within Blacknight. Where suppliers are found to have contravened the requirements set out in this Code, Blacknight reserves the right to terminate any associated agreement or business relationship.