

Freshwave Supplier Code of Conduct

1. We believe ESG¹ is at the heart of all great organisations

At Freshwave, we are committed to our people, communities, and suppliers, acting as responsible corporate citizens and aiming to lead by example. Therefore, our ESG direction and targets flow down to us from our parent company Digital Bridge as a portfolio company. Our bespoke ESG strategy defines and sets the foundation for our KPIs, which we report annually.

In this regard, we developed this Code of Conduct to define the standards and non-negotiable principles to guide any interaction and collaboration with our suppliers. We expect their behaviour to be aligned with and fulfil this document, which was created according to the best ESG practices and our values.

1.1 Our company values

Our approach and commitment resonate with and are reinforced by our company values:

Pioneering
Own the pace of change.

Principled
Together, we do what is right.

Versatile
Adapt to evolve.

We, therefore, expect our suppliers and their multiple tier supply chains to join us in this commitment.

1.2 Our key areas

By working together with our suppliers, we believe that we will add value to our organisation, contribute to local community development, and deliver the change required to meet sustainability challenges. Therefore, we will focus on these approaches:

- Driving our activities to meet our Digital Bridge targets across all areas of ESG in our business.
- Acting in a transparent and inclusive manner to ensure diverse and under-represented suppliers can access our organisation.
- Ensuring through an inclusion and diversity focus that our people, clients, suppliers and other third parties are treated with dignity and respect.
- Attracting and recruiting the best candidates from a diverse pool of talent.
- Reducing environmental impact in our own operation and supply chain, with active support for stakeholders and suppliers across all ESG measurement and disclosure.
- Ensuring our health and safety performance is always our key priority through our delivery as an infrastructure partner.

¹ Environmental, Social and Governance

2. Our Principles of Conduct

Based on the above, we have established five general Principles of Conduct. Therefore, we expect all our suppliers and their supply chains to read and commit to them:

2.1 Inclusion, diversity and social equity

At Freshwave, we are convinced that the most diverse teams have the best ideas and results. Therefore, we expect our supply chains to embed inclusion, diversity and social equality within their workplace policies and practices, ensuring that people, clients, suppliers and other third parties are treated with dignity and respect, irrespective of gender, race, faith, age, disability, sexual orientation, gender identity or socio-economic background.

2.2 Environment, health and safety

As part of our commitment to the people we work with and the areas we operate in, we want to work with our supply chain to reduce environmental impacts that would negatively affect scarce resources and ecosystems whilst contributing to climate change mitigation. Furthermore, health and wellbeing should be promoted at all points of the supply chain whilst operating with zero tolerance for safety incidents.

2.3 Transparency and ESG practices

As we previously mentioned, we believe ESG performance and disclosures are essential for responsible businesses contributing to a more sustainable society. Therefore, together with our suppliers, we want to develop and demonstrate best practices on our joint learning and journey. Additionally, as a minimum, all applicable laws and regulations must be adhered to. We also look for our suppliers to be transparent in their performance, sharing non-commercially sensitive information between us.

2.4 Human rights, integrity and ethics

We strongly disagree with any violation of human rights; hence we firmly invite our whole supply chain to act with permanent integrity, constantly striving to uphold the highest standards of ethical practice.

We abide by the same high standards and practices concerning eradicating modern slavery and human trafficking, including not using slave labour, illegal child labour or forced labour, ensuring that all terms of employment are voluntary and adhering to local laws in respect of minimum age requirements, wages, overtime and working hours.

Moreover, we invite our suppliers to work with their own supply chain to ensure these values and practices are cascaded, including ensuring full compliance with the Modern Slavery Act 2015.

2.5 Conflicts of interest

We request that suppliers avoid conflicts of interest and never participate in improper practices such as bribery and corruption. Furthermore, we ask them to report any situation that might prompt a conflict of interest related to any organisation or individual.

3. Third-party standards

We are committed to achieving a better and more sustainable future for all. As such, our suppliers are encouraged to be aware of and voluntarily contribute to the United Nations Sustainable Development Goals and report sustainability-related progress. We will lead by example by reporting against the Sustainability Accounting Standards Board (SASB) and the Taskforce for Climate-related Financial Disclosures (TCFD) with tailored measurements added for digital infrastructure businesses. All of these inform our Freshwave Supplier Code of Conduct, and we require our suppliers to adopt its principles, underpinned by commitments to business conduct, labour conditions, human rights, and the environment.

4. Complaints procedure

In the case of any queries, concerns, or reports of violation of this Code of Conduct, please get in touch with us immediately. We will process your complaint with confidentiality.

Email: supplier@freshwavegroup.com