

Supplier Code of Conduct

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Authorised for distribution

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Procurement

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1 Introduction

At Freshwave, we are committed to our people, communities, customers and suppliers, acting as responsible corporate citizens and aiming to lead by example. Our Environmental, Social and Governance (“ESG”) strategy defines and sets the foundation for our Key Performance Indicators which we report annually.

This Code of Conduct defines the standards and principles, that guide the interaction and collaboration between our Suppliers and Freshwave. Whilst this Code of Conduct is not intended to be legally enforceable, Freshwave expects the behaviour of each Supplier to be aligned with this Code of Conduct which incorporates best ESG practices along with our company values:



Engineering excellence



Do the right thing



Set the pace

Our approach in working with our Suppliers resonates with and is reinforced by these values – accordingly, we expect our Suppliers, and their supply chains, to commit to assist us in upholding these values. By working together, 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 the following:

- Driving our activities to meet our agreed ESG goals and Key Performance Indicators.
- 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, customers, 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.

Based on the above, we have established the principles of conduct, as detailed below in Section 2, that we expect all our Suppliers and their supply chains to read and commit to.



2 Our Principles of Conduct

2.1 Inclusion, Diversity and Social Equity

We are convinced that the most diverse teams have the best ideas and deliver the best results. Therefore, we expect each of our Suppliers to embed in their own organisation's workplace policies and which support/endorse principles of inclusion, diversity and social equality. By doing so Suppliers commit to ensuring that all people, customers, and companies in the supply chain are treated with dignity and respect and are not discriminated against, harassed or victimised, irrespective of gender, race, faith, age, disability, sexual orientation, gender identity or socio-economic background.

2.2 Human Rights

We strongly disagree with any violation of human rights; hence we expect our Suppliers and their 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.

We expect our Suppliers to work with their own supply chain to ensure these values and practices are cascaded, including full compliance with the Modern Slavery Act 2015.

2.3 Environment and Sustainability

We commit to our investors, staff, customers and the communities that we operate in, to avoid damage to the environment. Accordingly, we seek the same commitment from our Suppliers and seek their support to work with us and across their own supply chains to reduce environmental impacts that would negatively affect scarce resources and ecosystems, to assist in mitigating climate change and to eliminate or reduce levels of waste.

We are committed to achieving a better and more sustainable future for all. As such, we encourage each of our Suppliers 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.

2.4 Health and Safety

The health, wellbeing and safety of our employees and those of our Suppliers is of upmost importance to us. We seek the commitment from every Supplier to support us in our goal of zero accidents and provide a safe and healthy working environment for its employees. Accordingly, we expect each Supplier to promote and operate, at all points in the supply chain, safe and compliant working practices and conditions taking all necessary precautions to prevent accidents and injury.



2.5 Confidentiality and Security

At times we may share information or data that is commercially confidential or sensitive. Suppliers are expected to comply with the appropriate provisions in our contracts to protect the confidentiality of such information and data and suppliers must have appropriate security processes in place to protect such information and data. If the confidential or commercially sensitive information and / or data is held electronically then Suppliers must, at all times, maintain integrity and security of their systems.

Suppliers who provide FreshWave with hardware, software, or who possess administrative access to our networks, are mandated to adhere to the relevant stipulations of the Telecommunications Security Act 2021, inclusive of any subsequent amendments or revisions to this Act

2.6 Behaviour

We require our Suppliers to uphold the highest standards of behaviour in their own organisation and across their supply chain. Each Supplier and their supply chain should always avoid situations that could lead to a conflict of interest and should never participate in improper practices such as bribery, money laundering, terrorist financing and corruption.

Suppliers shall not offer, accept or solicit any gifts, entertainment, or hospitality whereby there is reason to believe, or a reasonable and informed third party would likely conclude, that there may be intent to improperly influence decisions or impair objectivity related to its business dealings.

Suppliers should ensure that all of their own suppliers, and all of the companies within their supply chain, are treated fairly and are paid on time for the services and / or products that they provide.

Furthermore, we encourage each Supplier to have an open communication channel that encourages and allows their employees and companies in their supply chain to speak up without fear of retaliation to report improper behaviour and any situation that might prompt a conflict of interest related to any organisation or individual.

3 Conclusion

We believe ESG performance and disclosures are essential for responsible businesses contributing to a more sustainable society and accordingly, we'll develop and demonstrate ESG best practices across everything we do. The support of each of our Suppliers is at the heart of this desire and thus we look to each of them to be transparent in their performance, comply with this Code of Conduct and, as a minimum, adhere to all applicable laws and regulations.

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



General

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