

## PHOENIX group General Procurement Supplier Code of Conduct

This General Procurement Supplier Code of Conduct (GP SCoC) sets out the minimal standards with regards to becoming a PHOENIX group company supplier. For suppliers operating in certain PHOENIX countries, additional requirements not contained in this document may apply. Such information will be provided separately.

PHOENIX seeks to comply with all laws, regulations, and guiding principles applicable within the European Union and within the individual countries in which we operate. PHOENIX expects the same from its business partners.

To ensure a consistent group-wide approach, doing business with a PHOENIX group company requires compliance with this GP SCoC and with national legislation. Our suppliers must be aware of applicable legislation of the countries in which they are seated and in which they operate and adhere to such legislation as a minimum requirement. Applicable legislation takes precedence should it conflict with any condition imposed by the GP SCoC. In such cases, the supplier must inform us immediately.

There is a supplier evaluation and selection process for all PHOENIX group general procurement spending. In this process, we assess and select suppliers based not only on the usual criteria of service level, quality, and commercial performance, but also on their commitment to meet the goals and objectives set out in this GP SCoC.

### 1. Ethical standards

The PHOENIX group corporate mission statement describes the values the group is committed to related to the sustainable development of the organisation over and above the regulatory standards. Ethical and fair dealing with business partners, competitors, and our employees is a core principle of our organization. The supplier must therefore support our group values and, in addition, uphold the principles of the United Nations' *Universal Declaration of Human Rights* in accordance with applicable law and practice. This especially applies to:

#### **Child labour**

The minimum age for admission to employment or work shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years. Therefore the supplier may not employ children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted if it in any way hinders the child from completing their compulsory schooling or training, or if such employment is harmful to their health or development. The minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardise the health, safety or morals of

young persons shall not be less than 18 years. (ILO Minimum Age Convention, 1973 (No. 138))

#### **Forced labour**

The supplier as well as its subsidiaries and partners may not make use of forced or compulsory labour.

#### **Compensation and working hours**

The supplier must comply with the respective national laws and regulations regarding working hours, wages, and benefits.

#### **Discrimination**

The supplier may not discriminate against anyone on the basis of race, religion, political affiliation, disability, age, sexual orientation, or gender.

#### **Freedom of association and the right to collective bargaining**

Employees shall be free to exercise their legal rights to join, form, or work for organisations that represent their interests as employees. The supplier may not threaten, penalize, or restrict workers – or interfere with them in any other way – for legally and peacefully exercising their rights. The supplier shall respect employees' rights to collective bargaining.

### **2. Health and safety**

The PHOENIX group Code of Conduct ensures that all PHOENIX group employees work in a healthy and safe environment. We therefore expect the supplier to do their utmost to implement high standards of occupational health and safety. The supplier must comply with the applicable occupational health and safety regulations of the areas in which they operate, and provide a work environment that is safe and conducive to good health in order to preserve the well-being of employees and to prevent accidents, injuries, and work-related illnesses.

### **3. Anti-corruption and competition compliance**

The supplier must comply with the PHOENIX group anti-corruption and competition compliance policies, as well as applicable local anti-corruption and bribery laws. In particular, the supplier may not offer inappropriate services, gifts, loans, cash, cheques, invitations, or other benefits to third parties, including PHOENIX group employees, in order to influence the conduct of employees representing PHOENIX group.

### **4. Environment**

PHOENIX group works actively to reduce its direct and indirect impact on the environment and has enshrined its commitment to protecting it in its Code of Conduct. The supplier is expected to adhere to our environmental strategy and must therefore be well informed of, and comply with our

requirements in accordance with national legislation, regulations, and industry standards. This involves being aware of and monitoring its own environmental impact, while constantly working to minimise the effects of its operations on the environment.

#### **5. Business partner dialogue**

The supplier undertakes to communicate and explain, to the best of its ability, the principles stated in this GP SCoC to its subcontractors and other business partners, who are involved with supplying products and services pertinent to the supplier's contract with PHOENIX group. The supplier shall motivate such parties to adhere to the standards contained herein.

#### **6. Data protection**

When processing and using personal data, respect for privacy is a serious concern. PHOENIX group therefore places great importance on the protection of such data, which is a prominent issue in the PHOENIX group Code of Conduct. Where personal data (e.g. names, addresses, or other contact details) is collected, it is processed exclusively in accordance with the applicable local regulations on data protection. The supplier must meet the requirements of the European General Data Protection Regulation, which came into force in May 2018, if he works with PHOENIX group in the European Union or European Economic Area. The supplier must take technical and organizational measures by means of state-of-the-art technology to protect data.

#### **7. Third Party Harassment**

Phoenix Group operates a zero-tolerance policy in relation to harassment perpetrated against one of its colleagues by a third party, such as a client/customer or visitor to the organization. All colleagues are encouraged to report any and all instances of harassment that involve a third party in line with our reporting procedure, as outlined below.

If we find that the allegation is well-founded, we will take steps we deem necessary in order to remedy this complaint. This can include, and is not limited to:

- warning the individual about the inappropriate nature of their behaviour;
- banning the individual from organization premises;
- report the individual to their manager or Company;
- reporting the individual's actions to the police.

In addition to this, we require suppliers to take all reasonable steps to deter and prevent any form of harassment from third parties taking place.

#### **8. Compliance with the Supplier Code of Conduct**

PHOENIX group reserves the right to inspect, with reasonable notice, the supplier's compliance with regards to the requirements enshrined in this GP SCoC. PHOENIX group encourages its suppliers to implement their own binding ethical guidelines.