

# The Fedcap Group Supplier Code of Conduct

## 1. Policy Statement

The Fedcap Group expects its suppliers, including any subcontractors or delivery partners under the supplier's control, to adopt and/or maintain standards of conduct consistent with the provisions of this document. In addition, the Fedcap Group expects its suppliers to comply with all applicable laws and regulations. Conformance to this Policy is a material consideration in selecting and evaluating our new and existing supplier relationships.

## 2. Environmental Standards

The Fedcap Group expects its suppliers to support and promote environmental protection, and to comply with local environmental laws and regulations. The Fedcap Group expects its suppliers to promote greater environmental responsibility and support it in the use of goods and services which help mitigate adverse environmental impact, including in managing and utilizing resources such as energy, paper, water, and waste. The Fedcap Group encourages its suppliers to continuously improve their awareness, education, and innovation to minimize waste and emissions from their operations, products, and services and to protect the environment and conserve resources such as water. Finally, the Fedcap Group expects its suppliers to promote the development and distribution of environmentally friendly technologies.

## 3. Labor Practices

The Fedcap Group expects its suppliers to forbid human trafficking, the use of all forms of forced or compulsory labor and any other form of modern slavery. Suppliers must take all possible steps to ensure that these are not taking place in any of their supply chains or their own operations. The Fedcap Group will not engage with suppliers involved in human trafficking, modern slavery, or forced labor including any corporal punishment in the workplace. ILO Conventions 29 and 105 provide further detail in respect of forced labor.

The Fedcap Group expects its suppliers to recognize and respect the rights of their employees to associate freely and to organize and bargain collectively in accordance with the local laws in which they are employed.

The Fedcap Group is against child labor. The Fedcap Group expects its suppliers not to use child labor, to support effective abolition of child labor, and to take all reasonable steps to eliminate such labor from their supply chain. ILO Conventions 138 and 182 provide further detail in respect of child labor.

The Fedcap Group's suppliers are encouraged to promote fair pay practices with their workforce, including developing their understanding of living wages consistent with local laws and regulations.

## 4. Fundamental Human Rights

The Fedcap Group expects its suppliers to work to support and respect the protection of human rights in accordance with the UN's Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights, and to ensure that they are not complicit in any human rights abuses. Where it is identified that suppliers have caused or contributed to adverse impacts, they are expected to provide or cooperate in the remediation process.

#### **5. Occupational Health, Safety and Security Standards**

The Fedcap Group expects its suppliers to have a systematic approach to health, safety and security management adhering to all applicable local laws, regulations, and standards and to implement all precautions necessary to protect the health, safety and security of its workers, the Fedcap Group's employees, and the Fedcap Group's customers.

#### **6. Business Ethics**

The Fedcap Group expects robust and proactive culture of ethics, transparency, and integrity. Reports by any parties of actual, planned, or potential misconduct on the part of The Fedcap Group, its staff, suppliers, and subcontractors will be investigated by The Fedcap Group in strict confidence. To protect the integrity of a whistleblower process, the Fedcap Group has made available anonymous reporting to a third-party compliance hotline through <https://www.ethicspoint.com> or by calling 1:866-384-4277; TTY: 1-866-294-9572.

The Fedcap Group strictly prohibits bribery and corruption in any form. The Fedcap Group expects that its suppliers will not engage in or in any way encourage bribery including, but not limited to, acts of bribery that are direct or through a third party; of a public official or a private individual; financial or in some other form; or that relate to past, present, or future performance or nonperformance of an activity.

#### **7. Diversity and Inclusion**

The Fedcap Group's suppliers are encouraged to promote diversity and inclusion by not discriminating on the grounds of sex, race, color, nationality, ethnic, national or indigenous origin, disability, age, marital or civil partner status, pregnancy or maternity, parental status, sexual orientation, gender identity, expression or reassignment, HIV or AIDS status, flexibility of working arrangements, military and veterans status, religion or belief, political opinion or union membership, while hiring and employing workers or when selecting and contracting with suppliers.

#### **Document Control**

This policy will be reviewed at least annually to respond to any changes. The Fedcap Group reserves the right to amend this policy at any time.



## Supplier Code of Conduct Acknowledgment Form

I, the undersigned, have read and understood the content, requirements, and expectations of The Fedcap Group's Supplier Code of Conduct. I am complying and will remain in compliance with its letter and spirit in its entirety. I acknowledge that by signing this Supplier Code of Conduct Acknowledgment Form that all work for or on behalf of any entity within The Fedcap Group will be performed with the necessary skills and qualifications necessary to uphold the principles and meet the standards set forth in The Fedcap Group's Supplier Code of Conduct.

Company Name: \_\_\_\_\_

Representative Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_