



Supplier Code of Conduct



Banimmo (“we”; “us”; “our”) is committed to corporate social responsibility and sustainable business practices. We expect our suppliers engaged in providing goods and/or services to us (“Suppliers”; “you”; “yours”) to have, or to make, a similar commitment by abiding to our supplier code of conduct (“Supplier Code of Conduct”). We expect you to ensure that the Supplier Code of Conduct is communicated to your employees, parent, subsidiary and affiliated entities, as well as any subcontractors, suppliers and project participants.

The Supplier Code of Conduct is inspired by the general principles and guidance provided by international instruments dealing with human rights and responsible business conduct. It describes what we expect of you regarding: (1) Business ethics, (2) environment, (3) employment, working conditions, human rights, health and safety. By signing the Supplier Code of Conduct Acceptance Letter, you accept and confirm:

- (i) having read our [[Anti-bribery and Anti-corruption policy](#)];
- (ii) (a) to comply with, (b) to implement, (c) to use your best efforts that your suppliers and subcontractors comply with and implement, and (d) to self-monitor (on a regular basis) compliance with, the Supplier Code of Conduct and all applicable laws and regulations;
- (iii) to provide us, at our first request, with any information required to demonstrate the foregoing;
- (iv) that we have the right to carry out audits and evaluations to verify compliance with the Supplier Code of Conduct; and
- (v) that your employees, parent, subsidiary, and affiliated entities as well as any subcontractors and project participants have the right to bring to our attention any potential misconduct or violations of laws or the Supplier Code of Conduct, through our “Raise a Concern” Platform or otherwise.

Compliance with the Supplier Code of Conduct is a condition to start and to continue a contractual relationship with us.

1. Business Ethics

We are committed to upholding ethical business standards and complying with applicable laws, rules, and regulations. We require you to do the same and at a minimum expect you to:

1. *(Corruption)* comply with our [Anti-bribery and Anti-corruption policy](#).
2. *(Fraud)* act with integrity in all your business dealings and not to engage in any type of fraudulent activities.
3. *(Conflicts of interest)* (a) avoid any (perception of) conflicts of interest; (b) promptly report to us any situation that is, or might appear to be, a conflict of interest; and (c) bring to our attention any cases where a Banimmo employee has economic ties with your business activities.
4. *(Fair competition)* (a) avoid anti-competitive practices; and (b) to fully comply with all applicable competition laws, rules and regulations.



5. *(AML)* (a) comply with all applicable anti-money laundering and anti-terrorism laws, rules and regulations; and (b) not to commit or assist in any act prohibited by such laws and regulations.
6. *(Confidential information)* (a) not use or reveal any confidential information held and/or provided by us, even after our commercial relationship has ended; and (b) to comply with all applicable laws, rules and regulations with respect to the processing of personal data in the course of your business dealings with us, including:
 - (i) designing and maintaining processes to provide appropriate protection of confidential information;
 - (ii) only collecting personal data that is relevant and limited to what is necessary for the purpose of the data processing carried out in the course of its business dealings with Banimm;
 - (iii) ensuring data security in accordance with all applicable laws, rules and regulations (and contractual provisions);
 - (iv) ensuring that data subjects can exercise their rights with regard to their data in accordance with the applicable regulations.
7. *(IP)* (a) respect the intellectual property of others; and (b) not to use without permission, or infringe, any third party intellectual property rights.

2. Environment

Banimm is committed to (a) reducing the impact of our operations on the natural environment and (b) working with its Suppliers to do the same. We therefore expect you to:

1. support a precautionary approach to environmental issues and carry out systematic risk assessments of materials, products and processes in order to apply such precautionary approach.
2. implement a continuous improvement approach to:
 - prevent and reduce energy consumption and greenhouse gas emissions;
 - reduce water consumption and treat waste water;
 - prevent and reduce waste generation and ensure responsible waste management;
 - prevent, reduce and treat air emissions;
 - prevent and reduce the impact of noise, odors, light and vibrations on the surrounding environment;
 - reduce the use and ensure safe handling and storage of chemicals and other hazardous substances;
 - prevent, minimize and compensate all negative impacts on biodiversity; and
 - using natural resources in a sustainable manner.
3. promote the development and use of environmentally friendly technologies and regularly evaluate such technologies.



3. Employment, working conditions, human rights, health and safety

We are committed to respecting human rights in our internal operations and require the same from you. We expect you, as a minimum standard, to:

1. defend and respect the protection of human rights established at international level and to ensure that you are not complicit in human rights violations;
2. create and maintain an environment where all employees are treated with dignity and respect, and not to engage in threats of violence, verbal or psychological, harassment or assault, sexual exploitation and abuse;
3. comply with all laws regarding the payment of wages and working hours and to ensure that wages are paid regularly;
4. (a) ensure that your workers, without distinction, have the free exercise of the right to organize, the right to promote and defend their interests and the right to collective bargaining; and (b) protect your workers against all forms of discrimination;
5. to prohibit forced or compulsory labor in all its forms.
6. not to employ: (a) any child under the minimum age for employment specified in the applicable legislation; (b) any person under the age of 18 for work which, by its nature or the conditions in which it is carried out, is likely to harm the health, safety or morals of such persons.
7. ensure equality of opportunity and treatment in employment and occupation without discrimination on the grounds of age, sexual orientation, civil status, birth, wealth, religious or philosophical belief, political belief, trade union belief, language, current or future health condition, disability, physical or genetic characteristic, social origin, or other grounds recognized by the national legislation of the country where the contract is performed.
8. take all necessary measures to ensure that neither you nor your parent, subsidiaries, affiliates, or subcontractors engage in sexist or discriminatory employment practices, in particular with regard to recruitment, promotion, training, remuneration and benefits.

We also expect you to (a) treat health and safety as a priority, and hence (b) to:

1. ensure that your activities do not adversely affect the health and safety of your employees, subcontractors, project participants, and users of your products and services.
2. comply with all applicable health and safety laws, regulations and standards and to provide a safe and healthy workplace to prevent accidents and injury in the course of work.
3. be proactive with regard to health, safety and security issues.



4. Compliance with the Supplier Code of Conduct

You are required to promptly report to us any legal violations or violations of the Supplier Code of Conduct and to promptly forward to us, if permitted by law, any regulatory requests, media inquiries, or other third-party requests concerning us.

[Raise A Concern](#) enables our colleagues and your employees, parent, subsidiary and affiliated entities, as well as any subcontractors and project participants, to confidentially raise concerns about potential misconduct or violations of laws, the Code of Conduct and/or other codes, policies, or professional (mis)conduct. Your employees, parent, subsidiary and affiliated entities, as well as any subcontractors, suppliers and project participants should be properly informed of this possibility to confidentially raise concerns. Details of [Raise A Concern](#) are available on our website.

We reserve the following rights to ensure and enforce your compliance with the Supplier Code of Conduct.

1. Supplier selection

We will evaluate your compliance with the Supplier Code of Conduct during your evaluation, selection, or onboarding process, and/or at any other time during your relationship with us.

2. Supplier assessment

During the Supplier certification process, you will be requested to affirm your acceptance and compliance with the Supplier Code of Conduct by signing the acceptance letter. You may be asked to re-affirm compliance with the Supplier Code of Conduct periodically. Upon request, you will be required to provide written information on your policies and practices related to compliance with the Supplier Code of Conduct. In addition, we may at times request that certain Suppliers complete an evidence-based assessment scored by a third party or allow an on-site audit to monitor conformance with and encourage continuous improvement against this Supplier Code of Conduct and other relevant issues.

We are committed to working with you to improve performance on topics addressed by this Supplier Code of Conduct and may at times request that you take specific corrective actions related to this Supplier Code of Conduct and other relevant issues. We expect you to agree to work together to jointly address applicable and relevant topics.

3. Non-compliance, violations, and termination

Each Supplier shall ensure that all suppliers, subcontractors, and agents it uses to fulfill obligations or commitments to Banimmo to comply with the Supplier Code of Conduct, or impose substantially similar obligations. Suppliers shall acknowledge that if they become aware of a violation, including its suppliers', subcontractors', and agents' violations, they must report to us *[via our [Raise A Concern](#) platform]* and address it.

In the event of non-compliance with, or a violation of, the Supplier Code of Conduct, we may provide you a reasonable opportunity to remedy the issue through agreed-upon corrective actions, unless the violation is severe or incurable, or constitutes a violation of law. In the case of violation of this Supplier Code of Conduct or law, we may suspend or terminate our relationship with you. In the case of a violation of the law, we will also disclose the matter to the appropriate authorities.



Version history	
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1	15/02/2024