

## CODE OF CONDUCT FOR BUSINESS RELATIONSHIPS

### Introduction

1. Alexony (“we” or “us”) has committed to building a sustainable practice by establishing systems and processes to manage our adverse impacts on human (including labour) rights, environment (including climate) and anti-corruption (the “three areas of fundamental responsibility”). Part of this commitment involves recognising that we may also cause such adverse impacts through our business relationships; thus, we expect all our business partners to meet the expectations set forth in this Code of Conduct for Business Relationships (the “Code”). Failure to establish systems to manage impacts on these three areas of fundamental responsibility may impact our partners’ ability to do business with Alexony in the future.
2. The terms of this Code apply to all our customers, suppliers and partners. It shall be our business relationships’ responsibility to ensure that their own business relationships also have processes to manage their adverse impacts on human (including labour) rights, environment (including climate) and anti-corruption.

### Legal Compliance

3. This Code sets the minimum expectations from our business relationships and is based on the United Nations Global Compact’s principles, as derived from the International Bill of Human Rights, International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption, and made operational by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.
4. Alexony expects business relationships to adhere to applicable laws of their areas of operation. Where national laws provide for better or lesser protection of human (including labour) rights, environment, and anti-corruption, the higher standard shall apply. Where there is a conflict between national law and the provisions of this Code, the business relationship shall report this to Alexony and try, to the extent possible, to honour the Code’s provisions while adhering to national regulation.

### Process Requirements

5. Alexony expects our business relationships to implement systems and processes to manage their adverse impacts on human (including labour) rights, environment (including climate) and anti-corruption.

#### 5.1. A Policy Commitment

This shall be approved by the business relationship’s senior management and made publicly available. It shall stipulate expectations regarding human (including labour) rights, environment (including climate) and anti-corruption from employees and business relationships.



## 5.2. A Due Diligence Process

The process shall regularly assess potential and actual impacts on the three areas of fundamental responsibility, and integrate impact assessment findings across relevant internal processes and functions, so as to ensure the prevention and mitigation of identified adverse impacts; and account for and report to Alexony how impacts are being addressed.

## 5.3. A Remediation System

If a business relationship discovers or is informed that it causes or contributes to an adverse impact, the business relationship shall enable access to remedy through legitimate processes for those affected and/or inform the relevant authorities. The remediation process must be legitimate, accessible, predictable, equitable, transparent, aligned with international principles, continually-updated and based around dialogue. To address adverse impacts early, business relationships could establish or participate in operational-level or sector-based grievance mechanisms accessible to businesses, individuals and/or communities. If a business relationship did not cause nor contribute to an adverse impact, but is linked to it through its value chain, the business relationship shall use leverage to make the causing entity prevent reoccurrence, provide remedy to those affected and inform relevant authorities.

## Principles and Standards

Business relationships' policy statements, continuous due diligence processes and remediation systems shall cover the globally-endorsed principles on the three areas of fundamental responsibility described below:

### Human Rights

1. Right to self-determination (indigenous peoples' rights) (ICESCR art. 1 & ICCPR art. 1)
2. Right to non-discrimination (ICESCR art. 2 & ICCPR art. 2)
3. Right to work (training, contract, termination) (ICESCR art. 6)
4. a. Equal pay for equal work (ICESCR art. 7)
4. b. A living wage (minimum wage) (ICESCR art. 7)
4. c. Safe and healthy working conditions (ICESCR art. 7)
4. d. Equal opportunity for everyone to be promoted (ICESCR art. 7)
4. e. Rest, leisure and paid holidays (ICESCR art. 7)
5. Right to form and join trade unions and right to strike (ICESCR art. 8)
6. Right to social security, including social insurance (ICESCR art. 9)
7. a. Protection of mothers before and after childbirth (ICESCR art. 10)
7. b. Children's and young people's protection from exploitation (no child labour) (ICESCR art. 10)
8. a. Right to adequate food and its fair distribution (ICESCR art. 11)
8. b. Right to adequate clothing (ICESCR art. 11)
8. c. Right to adequate housing (ICESCR art. 11)
8. d. Right to water and sanitation (ICESCR art. 11)
9. Right to health (ICESCR art. 12)
10. Right to education (ICESCR art. 13 & art. 14)
11. a. Right to take part in cultural life (ICESCR art. 15)
11. b. Right to benefit from scientific progress (ICESCR art. 15)
11. c. Right to material gains from inventions (ICESCR art. 15)
11. d. Moral rights of authors (protection of copyright) (ICESCR art. 15)
12. Right to life (ICCPR art. 6)
13. a. Right not to be subjected to torture, cruel, inhumane, or degrading treatment (ICCPR art. 7)
13. b. Right to free, prior and informed consent to medical/scientific experimentation (ICCPR art. 7)
14. Right not to be subjected to slavery, servitude or forced labour (ICCPR art. 8)
15. Right to liberty and security of person (ICCPR art. 9)
16. Right of detained persons to humane treatment (ICCPR art. 10)
17. Right not to be subjected to imprisonment for an inability to fulfil a contract (ICCPR art. 11)
18. Right to freedom of movement (ICCPR art. 12)
19. Right of aliens to due process when facing expulsion (seeking asylum) (ICCPR art. 13)
20. Right to a fair trial (ICCPR art. 14)
21. Right to be free from retroactive criminal law (ICCPR art. 15)
22. Right to recognition as a person before the law (ICCPR art. 16)
23. Right to privacy (ICCPR art. 17)
24. Right to freedom of thought, conscience and religion (ICCPR art. 18)
25. a. Right to freedom of opinion (ICCPR art. 19)
25. b. Right to freedom of expression (ICCPR art. 19)
25. c. Right to freedom of information (ICCPR art. 19)
26. a. Right to freedom from war propaganda (ICCPR art. 20)
26. b. Right to freedom from incitement of racial, religious or national hatred (ICCPR art. 20)
27. Right to freedom of peaceful assembly (ICCPR art. 21)
28. Right to freedom of association (ICCPR art. 22)
29. Right to protection of the family and the right to marry (ICCPR art. 23)
30. Right to protection of the child and right to acquire a nationality (ICCPR art. 24)
31. Right to participate in public affairs (ICCPR art. 25)
32. Right to equality before the law, equal protection of the law and rights of nondiscrimination (ICCPR art. 26)
33. Rights of minorities (culture, religious practice and language) (ICCPR art. 27)

### Environmental Areas

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution, prevention and control
6. Protection and restoration of biodiversity and ecosystems
7. Use of energy
8. Use of raw materials (in particular scarce natural resources)
9. Use of chemicals
10. Use of ozone depleting substances or persistent organic pollutants
11. Handling, transportation and waste management of hazardous substances
12. Surface water emissions
13. Soil and groundwater emissions
14. Noise emissions and light emissions
15. Odour emissions
16. Animal welfare
17. Wastewater management
18. Solid waste management
19. Food waste management
20. Use and diffusion of environmentally-friendly technologies

### Economic Principles

1. Accurate books and records, including data on income from past five years.
2. Bribes to or corruption of public officials (including both 'active' and 'passive' corruption, also called 'extortion' or 'solicitation').
3. Bribes to or corruption of private counterparts (including both 'active' and 'passive' corruption, also called 'extortion' or 'solicitation').
4. Trading in influence in relation to business partners, government officials or employees.
5. Bribes, corruption or trading in influence through the use of intermediaries.
6. Use of facilitation payments unless you are subject to threats or other coercion.
7. Political contributions, charitable donations and sponsorships in expectation of undue advantages.
8. Offering or accepting gifts beyond stated value (approvals).
9. Permitting or participating in money laundering.
10. Hiring government employees whose jobs create conflict of interest with former job duties of such employees.
11. Abstain from cronyism and nepotism.
12. Clearly define job duties based on skills, qualifications and experience.
13. Extortion or blackmail.
14. Fraud or embezzlement.
15. Anti-trust and -competition.
16. Tax evasion.

