

Cycle0

Supplier code of conduct



1. Commitment Towards a Sustainable Supply Chain

For Cycle0 group, good ethics and a strong commitment to corporate responsibility and sustainable business practices are essential to manage the challenges and opportunities of a global environment in constant and rapid change. To fulfil this commitment, we are committed to actively promoting the 10 principles of the UNGC (United Nations Global Compact) that address human rights, the environment, and the fight against corruption. Likewise, it is committed to the values of the International Labour Organization (ILO).

For this reason, we want to actively involve our supply chain in our sustainability efforts and have established this Supplier Code of Conduct (hereinafter "Supplier Code") to serve as their guidance.

This Supplier Code applies to Cycle0's service and product providers, advisors, agents, and representatives (each referred to herein below as "Supplier" and collectively as the "Suppliers").

2. Legal Compliance

Suppliers must comply with the mandatory provisions of this Supplier Code and with all applicable laws and regulations in each jurisdiction in which they operate and must use their best efforts to comply with the other principles set forth herein, when dealing or acting in the name of Cycle0. Additionally, to promote corporate social responsibility, we expect our suppliers to apply the standards set forth in this Supplier Code in their own supply chain.

3. Our Standards

3.1 Labour

Suppliers must comply, at a minimum, with all local laws and regulations regarding employment and labour in the countries where they operate. On the other hand, suppliers must comply with the following principles:

3.1.1 Non-Discrimination and Equal Opportunities

Cycle0 supports diversity and equality in employment. Suppliers must offer equal opportunities and fair compensation without discrimination.

3.1.2 Child Labour

Cycle0 will not engage in or tolerate the use of child labour by its suppliers. Our suppliers should not use, encourage, or engage in child labour. Child labour refers to the type of work that deprives children of their childhood, potential or dignity, and that is detrimental to their physical or mental development. Many countries have a minimum age for employment or work; our suppliers must understand and respect these requirements. Suppliers may carry out apprenticeship or work experience programs that comply with applicable laws.

3.1.3 Forced Labour, Modern Slavery, and Human Trafficking

Cycle0 will not engage in or tolerate the use of forced labour, slavery, or human trafficking at any level in its supply chains. Suppliers must not require anyone to perform a job or service under the threat of penalty.

3.1.4 Freedom of Association

Suppliers must recognize and respect the principle of freedom of association and the right to collective bargaining of their employees.

3.1.5 Respect and Dignity

Suppliers must treat all employees (regardless of employment status) fairly, ethically, respectfully and with dignity. Suppliers must protect their employees from harassment, bullying and victimization in the workplace, including all forms of sexual, physical, and psychological abuse, as well as any form of retaliation.

3.2 Health and Safety

Cycle0 requires its suppliers to consider the occupational health and safety of their employees as a priority in all aspects of their activities. At a minimum, suppliers must comply with all applicable health and safety laws, regulations, and standards.

Likewise, suppliers must adopt appropriate measures, such as the implementation and execution of policies, standards, procedures, contingency measures, and management systems, to prevent occupational diseases and work accidents, and to provide a safe and healthy place of employment to its employees. Suppliers must provide the necessary documentation and data to comply with the health and safety requirements of Cycle0 and other interested parties of our products.

We encourage our suppliers to:

- Communicate to your management, employees, and contractors your commitment to improving health and safety, and provide all necessary training.
- Apply for and maintain ISO 45001 certification or equivalent certification (where applicable).
- Systematically evaluate health and safety performance through appropriate audits and progress reports.

3.2.1 Drugs and Alcohol

Suppliers must ensure that each employee working under Cycle0 control and/or in Cycle0 facilities complies with all applicable local laws and regulations regarding drug and alcohol use.

3.3 Environment

Cycle0 conducts its business sustainably and in compliance with all environmental laws and regulations. Suppliers are expected to act in a sustainable way by putting environmental protection at the heart of all their activities. The supplier must, at a minimum, comply with all laws, regulations, and environmental standards applicable to a supplier's products or activities, and provide the data necessary for Cycle0 and its customers to fulfil their obligations. Suppliers must aim, in all cases, to reduce the impact of their activities and products on the environment and work towards a complete vision of the "total life cycle".

3.3.1 Supplier Responsibilities

To adopt any appropriate policies, standards, procedures, contingency measures, and management systems to ensure that its operations are managed sustainably; and will adopt the necessary measures to prevent contamination, conserve the natural resources required for its operations and to implement relevant emergency response plans and procedures.

This environmental responsibility must also include the following sustainability requirements for all suppliers, and not only to them but also extending it to their own suppliers:

- Energy efficiency, use of renewable energy and greenhouse gas emissions.
- Water quality and responsible consumption.
- Awareness of and responsibility for air quality.
- Sustainable resource management and waste reduction.
- Responsible management of chemicals.

3.3.2 Recommendations for Suppliers

- Communicate to your executives, employees, and contractors your commitment to improving the environment, and provide training on said commitment.
- Apply for and maintain ISO 14001 certification or equivalent certification (as applicable).
- Systematically evaluate environmental performance through appropriate audits and progress reports.

3.4 Anti-Corruption Policy

Suppliers must comply with all applicable anti-corruption laws and regulations, particularly provisions prohibiting corruption, bribery, and other unethical business practices. Additionally, suppliers must never make or approve illegal payments to anyone under any circumstances, including, but not limited to, payments to Cycle0 employees.

3.5 Fraud

Suppliers must act with integrity in all their activities and must not engage in fraudulent activities.

3.6 Conflict of Interest

Suppliers must disclose any apparent, potential, or actual conflict of interest to the relevant governing jurisdiction as soon as they become aware of it.

Any activity that has been approved, despite the actual or apparent conflict, must be documented.

3.7 Fair Competition and Anti-Trust Laws

Suppliers must act in accordance with national and international competition laws and not engage in price fixing, market or customer allocation, market sharing, or fraudulent bidding with competitors.

3.8 Intellectual Property Rights

Each supplier must respect the intellectual property rights of third parties and must not share or disclose information that belongs to Cycle0 without their express consent.

3.9 Data Privacy

Suppliers must comply with all applicable data privacy laws and regulations when processing personal information relating to Cycle0 employees and their customers.

Likewise, suppliers must inform those responsible for Cycle0 data privacy of any unauthorized use, disclosure or loss of Cycle0 personal information.

4. Governance

4.1 Compliance with the Supplier Code

Cycle0 reserves the right to evaluate compliance against the Supplier Code. Such evaluation may be carried out through a self-assessment or through an audit by Cycle0 or a designated third party, who may visit the supplier's premises upon appropriate notification where feasible. Cycle0 encourages its suppliers to implement policies, procedures, tools, and indicators necessary to ensure compliance with the principles listed above. On the other hand, suppliers are expected to manage, monitor, and develop their own supply chains so that compliance with the Cycle0 requirements of this Supplier Code can be ensured.

4.2 Selection Criteria

Compliance with this Supplier Code is an important criterion that is taken into account in the Cycle0 supplier selection process.

4.3 Corrective Measures

When a non-conforming situation is identified, Cycle0 can collaborate with suppliers to develop and implement a corrective plan to improve and resolve the situation.

5. Report a Problem or Concern

If any ethical or compliance problems arise, suppliers have an obligation to communicate them to Cycle0 through our third-party compliance platform accessible via the following link:
<https://cycle0.personiowhistleblowing.com>

6. Annex I

By signing this document, I confirm that I am aware of and understand the Cycle0 Supplier Code, and I commit to complying with it.

Supplier Name:	
Company Representative:	
Signature:	
Date:	
Place:	