

## Supplier Code of Conduct

### Overview

Environics Analytics (EA) Supplier Code of Conduct (“SCC”) explains the fundamental values and standards of behaviour that are expected from us and our partners. The SCC provides various guidelines for ethical behaviour based on EA values and applicable laws and regulations.

Environics Analytics continuously strives to deal with suppliers willing to demonstrate a commitment to sustainable development by adopting ethics, labour, and human rights, health, safety, and environmental principles.

EA Suppliers, in all their activities, must conduct business operations in full compliance with the laws, rules, and regulations of the countries in which they operate and with the laws, rules, and regulations of any other jurisdiction that applies to them. By adopting this SCC, EA aims at minimizing reputation, financial, and legal risks as well as promoting social and environmental responsibilities.

### Scope

The Supplier Code of Conduct applies to all suppliers, including but not limited to our partners, resellers, consulting partners, data and service providers.

### Policy

Environics Analytics is committed to establishing mutually beneficial relations with our business counterparties - suppliers and clients based on transparency, accountability and compliance with all relevant laws and regulations.

As a supplier of EA, we expect our supplier organizations to take all reasonable measures to comply with and abide by the principles of Ethical Business practices, Environment, Social, Labour, and Human Rights requirements. Supplier requirements include:

- Conduct all work duties and business relationships with integrity
- Comply with all laws and regulations of the countries where we do business, as well as maintain a focus on ensuring data privacy is maintained and user’s information is protected
- Avoid conflicts of interest
- Create a work environment where all supplier staff are free from harassment or discrimination on the basis of sexual orientation, gender or race or on any other basis forbidden by law.
- Maintain a safe, healthy and secure workplace that fosters an environment of collaboration where individuals can strive to excel

- Support this Supplier Code of Conduct by promptly reporting all issues and violations internally and ensuring that all individuals that report violations are free from persecution and repercussions.

### **Ethical Business Practices**

EA strongly believes in ethical rules, values, standards and characteristics regarding the behavior of our supplier organizations. Below is a list of ethical requirements:

- Supplier will not engage in, and will prohibit, any acts of fraud, corruption, bribery, or extortion (either within your organization or with suppliers/subcontractors of your organization)
- All business dealings shall be transparently performed and accurately reflected on suppliers' business books and records. Information regarding participant labour, health and safety, environmental practices, business activities, structure, financial situation, privacy breaches, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices
- Supplier will immediately report if there is any actual or perceived conflicts of interest in any business undertakings with Environics Analytics (either within your organization or your suppliers/subcontractors)
- Intellectual property rights are to be respected; the transfer of technology and know-how is to be done in a manner that protects intellectual property rights.
- Supplier and Client information is to be safeguarded in accordance with EA's standards and requirements
- Where Supplier handles sensitive information belonging to EA, EA Clients, and/or EA employees, supplier must strictly comply with all applicable privacy laws, rules and regulations of any other jurisdiction that applies to them and the contractual obligations set forth in the agreement. EA reserves the right to assess and monitor Suppliers' practices regarding information privacy and security protection
- Where Supplier is collecting first party personal information, supplier must ensure that consent is freely given, specific, informed, and unambiguous. A request for consent must be presented separately from other information, and consent for each purpose must be obtained separately
- Supplier must have a clear protocol to notify affected parties and regulatory authorities per applicable laws in the event of a Data Breach or Security Incident. Also, notify Environics Analytics 48 hours after discovery by emailing [privacy@environicsanalytics.com](mailto:privacy@environicsanalytics.com)
- Supplier shall respect and facilitate the exercise of individual (data subject) rights, including the right to access, rectify, delete, or transport their personal data.
- Supplier shall not use data licensed by EA for any discriminatory practices or for any purpose that could result in individual or community harms
- Suppliers shall comply with all applicable legislation relating to fair business practices, antitrust standards, anti-spam, competition standards and advertising
- Suppliers are encouraged to promote, identify and integrate diversity amongst their suppliers in addition to workers. Diversity programs to boost the representation of race, color, age, gender, sexual orientation, ethnicity, and disability are expected to be implemented and continually improved

## **Environment**

Environics Analytics acknowledges significant environmental issues associated with climate change, energy consumption, waste management, and electronic device recovery. Many of these subjects are complex for companies to address, as many outcomes are out of their control and direct influence; however, raising awareness of environmental issues, compliance to Policy and implementing programs are essential measures for EA and their suppliers to implement. EA encourages suppliers to take measures to reduce Greenhouse Gases (GHG) emissions generated by their operations, products, and services. This includes the following:

- Suppliers shall comply with all applicable statutes, regulations, guidelines, codes of practices, orders and agreements entered into with government authorities relating to the protection and conservation of the environment
- Suppliers shall obtain, maintain and report on all environmental permits, approvals, licenses and registration as required under environmental legislation
- Suppliers shall know the environmental impacts associated with their business activities and, where appropriate, implement policies, programs and employee training to address negative impacts

## **Social, Labour and Human Rights**

Environics Analytics has a strong commitment to equality and ensuring that all employees are treated equally regardless of gender, visible minority status, sexual orientation or other legally forbidden attributes. This commitment also extends to how Environics Analytics hires employees and expects their Suppliers to hire employees.

EA suppliers are expected to uphold employees human rights and treat all employees with dignity and respect in compliance with internationally accepted standards as defined in the International Labour Organization (ILO) conventions and regional or national legislation governing working conditions.

- Suppliers must uphold the human rights of workers. All supplier staff should be treated with dignity and respect in compliance with internationally accepted standards. The company shall not engage in corporal punishment, mental, physical, sexual, or verbal abuse as punishment against any worker.
- Supplier workplaces will be a safe and healthy work environment that present no hazards to staff
- Supplier employees shall be free to leave after reasonable notice has been given
- Supplier shall not use child labour in any stage of production or in any area of the business. The term "child" refers to any person under the age of 15, or under the age of completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

- Supplier work will be managed in such a way that no work will be executed in inhumane working conditions. In addition, suppliers must comply with all wage laws, and in the case that no wage laws exist, workers will be paid at least at the average local industry standard
- Suppliers shall provide their employees with a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to employees
- Suppliers shall respect the right of employees to freely form unions and participate in other aspects of collective bargaining in accordance with local laws.

### **Reporting a Violation of the Code (Whistleblower Policy)**

Environics Analytics is committed to protecting our employees, contractors, clients, and partners who, in good faith, report concerns related to unethical or illegal activities by our company, or actions and behaviours of those individuals affiliated with Environics Analytics within the scope of our organization's operations.

EA will not permit employees or other affiliated supplier stakeholders to retaliate, discriminate or act against employees or other stakeholders who bring to our attention, in good faith, what they believe to be reportable unethical or illegal activities.. Violation of this expectation of non-reprisal may result in disciplinary actions, including termination of employment or legal actions or severing the relationship with other affiliated persons.

Any employee who in good faith reports unethical behaviour will be protected from threats of retaliation, discharge, or other types of sanctions that are directly related to the disclosure of such unethical behaviour. Employees can email [whistleblower@environicsanalytics.com](mailto:whistleblower@environicsanalytics.com) or call our anonymous whistleblower hotline at: 647-800-1498 to leave a message.

If any employee or supplier has any question on any aspect of this policy, that person is encouraged to ask questions to

Environics Analytics Chief Compliance and Privacy Officer

Email: [Compliance@environicsanalytics.com](mailto:Compliance@environicsanalytics.com)

Phone: 888.339.3304 x1498

Or by Mail

33 Bloor Street East Suite 400  
Toronto ON M4W 3H1  
Canada

## **Management System**

Suppliers shall take all reasonable measures to monitor compliance with this SCC and to correct any non-compliance promptly. In this regard, suppliers should establish a management system whose scope is in line with the principles of this SCC and in accordance with international standards such as ISO 27001, SOC2, FedRamp, CMMC, NIST, and/or SA8000. The management system should be designed to ensure the following elements:

- Compliance with applicable laws, regulations, and customer requirements related to the Supplier's operations and products
- Conformance with this SCC
- Identification and mitigation of operational risks related to this SCC and continuous improvement

The management system may contain elements such as: company commitment and Policy towards corporate social and environmental responsibilities, identification of management accountability and responsibility, legal and customer requirements, risk assessment and management improvement objectives with implementation plans and measures, training programs, audits and assessments, compliance assessment, documentation and records and supplier responsibility.

## **Supplier Assessment and Monitoring**

- As a supplier of EA, each supplier agrees to retain and adequately secure documentation on the above requirements
- EA reserves the right to audit such records or to visit your facility for inspection, as reasonably requested by EA. EA may request suppliers to complete a self-assessment questionnaire in lieu of or in advance of such audit. The Supplier may be requested by EA to provide relevant supplier records, audit reports, policies and work procedures for compliance with this SCC.
- Supplier agrees to use reasonable commercial efforts to ensure that employees and sub-contractors are aware of and understand the terms of the EA Supplier Code of Conduct
- If a Supplier is unable or unwilling to comply for any reason, then the Supplier and EA can meet to discuss in good faith the Supplier's rationale for non-compliance.