

A large, stylized teal graphic on the left side of the page, resembling a vertical bar with a wavy, organic shape. It has a gradient from a darker teal at the top to a lighter teal at the bottom.

# **Supplier Code of Conduct**

April 2026

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## **1. About this code of conduct**

TradingHub is committed conducting business with the highest standards of integrity, ethics and social responsibility. The purpose of this code of conduct is to set out TradingHub's expectations of our suppliers in relation to sustainability, human rights, labour standards, the environment and ethical business practices and our suppliers are an integral part of this effort.

## **2. Who this code of conduct applies to**

This code of conduct applies to all our suppliers and partners.

## **3. Who is responsible for this code of conduct**

ExCo has overall responsibility for the effective operation of this code of conduct but has delegated responsibility for overseeing its implementation to the Finance team.

This code of conduct is reviewed annually.

## **4. Key areas of responsibility and standards**

### **Environmental Responsibility and Management**

Through our Environmental & Sustainability Policy we are committed to operating responsibly in relation to our environmental impacts. We expect our suppliers to join us in this sustainability effort:

- TradingHub encourages our suppliers to work actively towards minimising their environmental impact and to have a clear strategy in place for sustainable practices.
- TradingHub encourages our suppliers to ensure all material are fair traded and ethically sourced.
- TradingHub encourages suppliers to take the Circular Economy principles into consideration when developing their business.
- TradingHub expects suppliers to comply with relevant environmental laws and regulations.

## **Human Rights and Working Conditions**

TradingHub expects its suppliers to uphold the human rights of their own employees as well as those in their supply chain. We expect our suppliers to ensure they are not complicit in any human rights abuses:

- **Forced Labour:** Suppliers must not use any form of forced, bonded, or involuntary labour, including human trafficking.
- **Child Labour:** Suppliers must not employ workers who are younger than the legal working age in the respective country or below the age of 15, whichever is higher.
- **Working Conditions:** Suppliers must provide a safe and healthy work environment for their employees, ensuring compliance with occupational health and safety laws.
- **Fair Remuneration and Working Hours:** Suppliers shall ensure their employees are fairly remunerated and that working hours are in accordance with local legislation.
- **Non-Discrimination:** Suppliers must not discriminate in hiring, compensation, access to training, promotion, or termination based on race, colour, religion, gender, age, disability, sexual orientation, or any other protected status.
- **Freedom of Association:** Suppliers must respect the right of employees to join or form labour unions and engage in collective bargaining.

## **Business Ethics and Integrity**

- TradingHub expects suppliers to take appropriate and effective measures against corruption in all forms, including extortion and bribery in their own operations and supply chain.
- **Anti-Corruption:** Suppliers must not engage in any form of bribery, corruption, extortion, or embezzlement.
- **Conflicts of Interest:** Suppliers must avoid situations that may result in a conflict of interest and must disclose any potential conflicts to TradingHub.
- **Intellectual Property:** Suppliers must respect and protect the intellectual property rights of others.
- **Fair Competition:** Suppliers must adhere to fair business practices and compete fairly in the marketplace.

## **5. Transparency and Reporting**

Suppliers must maintain accurate and transparent records of their activities and provide requested information to TradingHub for the purpose of evaluating compliance with this Code of Conduct.

## **6. Subcontractors and Third Parties**

Suppliers must ensure that their subcontractors and third-party partners that are directly involved with TradingHub also adhere to this Supplier Code of Conduct.

## **7. Continuous Improvement**

Suppliers are encouraged to continuously improve their social, environmental, and ethical performance and to implement measures to address any identified shortcomings.

## **8. Consequences of Non-Compliance**

Non-compliance with this Supplier Code of Conduct may result in a remediation process and/or corrective action, up to and including termination of the business relationship with TradingHub.

## **9. Acknowledgment**

By entering into a business relationship with TradingHub suppliers acknowledge their understanding of and commitment to abiding by this Supplier Code of Conduct.

## **10. Disclaimer**

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