

## 1 Scope

This Supplier Code of Conduct (“SCoC”) is made on behalf of Bluesource Information Limited (“Bluesource”).

At Bluesource, we are committed to maintaining ethical and sustainable business practices across the business, within our day-to-day operations and our supply chain, such as:

- Conducting Business in a socially responsible and ethical manner;
- Protection the environment and the safety of people;
- Supporting Human Rights and labour practices;
- Engaging, learning from, respecting, and supporting the communities and cultures with which we work;
- Anticorruption;
- Fraud and money laundering; and
- Health and safety.

This SCC will be used as a guide to collaborate with our suppliers in the promotion of lawful, professional, and responsible business practices and applies to all companies and individuals that provide goods and/or services to Bluesource (collectively “Suppliers”). It also supports Bluesource’s policy on Corporate and Social Responsibility (available at <https://www.Bluesource.co.uk/about/privacy-and-governance/>).

## 2 Supplier Responsibilities

The provisions of this SCoC sets out the minimum standards of conduct that Bluesource expects from its Suppliers.

### 2.1 Business Ethics

Bluesource expects its Suppliers to conduct its business dealings and interactions in the highest ethical manor and expects all Suppliers to:

- Promote good business ethics and governance;
- Comply with contractual requirements on confidentiality and information security;
- Protect Intellectual Property Rights; and
- Promptly advise Bluesource of any:
  - Conflicts of interest
  - Politically exposed person/s working in a senior position for the Supplier
  - Supplier is found or suspected to be in breach of any of the responsibilities outlined in this SCoC, such as being investigated for fraud, or breach of human rights, etc.

## 2.2 Data security and privacy

To meet Bluesource's information security requirements and meet its obligations under ISO27001, it expects its Suppliers to:

- Comply with Bluesource's "[Data Protection and Information Security Requirements for Suppliers](#)" policy in relation to the performance of services to Bluesource and its customers, except as otherwise agreed in writing between the Parties;
- Adhere to data privacy laws;
- Have suitable information security controls and management system in place;
- Classify data and apply suitable controls;
- Report any actual and suspected data breaches involving Bluesource or their customer's data within 24 hours to Bluesource;
- Not process Bluesource or Bluesource's customers data other than intended or for longer than reasonably necessary;
- Manage business continuity risk in terms of ensuring availability of critical services to the Firm during a disaster event. Therefore, we expect our suppliers to have plans in place for their business to continue with minimal interruption in the event of an emergency, crisis, natural disaster or terrorist/security related event. Suppliers are expected to share these plans as requested by Bluesource; and
- Advise Bluesource of any non-compliance.

If a Supplier is requested or required to disclose any of Bluesource and/or Bluesource's customer confidential information under a subpoena, court order, statute, law, rule, regulation, regulatory request or other similar requirement (a "Legal Requirement"), the Supplier must, to the extent not precluded by law, provide prompt notice of such Legal Requirement to Bluesource prior to the disclosure where possible.

## 2.3 Environment

Bluesource aims to manage its impact on the environment as much as possible and expects its Suppliers to:

- Promote environmentally responsible practices;
- Comply with all applicable environmental laws and regulations;
- Identify environmental risks, impacts and responsibilities in an environmental policy, statement, or program; and
- Take responsible steps to minimise greenhouse gas emissions and reduce its environmental impact.

## 2.4 Human rights and labour practices

Bluesource does not accept child labour or forced labour and supports the UN Convention on the Rights of the Child (UNCRC) and that of the International Labour Organisation (ILO). Bluesource expects its Suppliers to:

- Provide a safe and secure workplace for their employees, with Health and Safety management in place;
- Comply with all applicable laws and regulations when setting employee conditions on working hours, benefits, wages (such as minimum wages, London minimum wages, gender pay gap), and age;
- Not tolerate human rights abuses, including slavery and human trafficking, and will not engage or be complicit in any activity that solicits or encourages human rights abuse;

- Comply with all applicable laws relating to modern slavery and human trafficking, such as those outlined in Bluesource’s own [Anti-Slavery and Human Trafficking Policy and Statement](#);
- It will always strive to build trust, deliver mutual advantage, and demonstrate respect for cultures, customs and values of individuals and groups; and
- Ensure that their supply chain are also compliant.

## 2.5 Inclusion and diversity

Bluesource is committed to providing equal opportunities, diversity and inclusion and expects its Suppliers to:

- Reject any form of discrimination in hiring and employment practices, such as, and not limited to, race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliations; and
- Provide equal opportunities and treatment to all employees.

## 2.6 Anticorruption, Fraud and Money Laundering

Bluesource conducts all its business in an honest and ethical manner. It takes a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever they operate and implement and enforce effective systems to counter bribery. Bluesource expects all Suppliers to:

- Comply with all applicable laws and regulations on corruption, bribery, prohibited business practices, fraud, money laundering and extortion;
- Disclose any potential or actual conflicts of interest to Bluesource; and
- Have a process in place to report actual or suspected fraud and/or money laundering, such as the whistle blowing policy detailed below in **section 4**.

## 2.7 Fraud and money laundering

Bluesource expects its Suppliers to:

- Comply with all applicable laws and regulations on fraud and money laundering; and
- Have reporting mechanisms in place, such as a whistle blowing policy, to report actual or suspected fraud or money laundering.

## 2.8 Gifts and Entertainment

Bluesource appreciates that the practice of giving business gifts and hospitality varies between companies and countries and regions, and what may be normal and acceptable one may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift or hospitality should always be considered.

Gifts and hospitality may create an inappropriate obligation or expectation on the part of the recipient or provider. We expect our Suppliers to refrain from providing personal gifts, fees, favors, other compensation, or business courtesies, including entertainment activities, that are intended to influence, or might reasonably appear to influence, a business decision. Notwithstanding the above, meals and

refreshments offered during a meeting is generally acceptable, provided the purpose is Bluesource related, the Supplier is in attendance, the cost is reasonable and customary, and it is an infrequent occurrence. Our goal is to obtain the best commercial terms for Bluesource instead of receiving gifts and entertainment. We expect our suppliers to work with us to obtain this goal.

## 2.9 Health and Safety

Bluesource takes health and safety seriously and aims to create an office environment that is both pleasant and safe to work in for its employees and visitors. We expect our suppliers to prioritize the occupational health and safety of their employees and meet legal, regulatory and contract specific requirements when performing their contractual obligations for Bluesource and/or Bluesource's customers.

## 3 Monitoring

Bluesource reserves the right to monitor, record and disclose all data and communications created, sent, received, or stored using Bluesource resources as it deems appropriate, subject to applicable laws and regulations. This includes all communications created by, sent to, received or stored by the Supplier relating to Bluesource or Bluesource's customers.

To assist Bluesource in monitoring compliance against such provisions, Suppliers may be required to provide information to support their compliance against them during the customer/supplier contractual relationship, such as copies of applicable policies or details of their processes, etc.

Bluesource will endeavor to work with its Suppliers to ensure they are compliant and where necessary, review any identified corrective action plans. Where non-compliance is identified, Bluesource expects the Supplier to work with its respective relationship manager/business contact at Bluesource to act quickly and implement appropriate corrective actions. Where compliance is unable to be achieved by the Supplier, Bluesource reserves the right to suspend and/or terminate any supply agreements, and without notice.


## 4 Whistle Blowing Policy

Concerns relating to ethical or business conduct matters, including accounting, internal accounting controls or auditing matters, should be brought to Bluesource's attention and may be made anonymously and confidentially.

Suppliers should report concerns about potential legal, regulatory or ethical misconduct, such as concerns regarding:

- regulatory compliance
- bribery or other improper payments
- potential money laundering or other suspicious activity
- inappropriate conflicts of interest
- the integrity of Bluesource's accounting practices, internal controls, auditing matters or public filings
- improper or questionable behavior by employees, supervisors, clients, counterparties, consultants, suppliers or other third parties.

## 5 Sign Off

For Bluesource	
Name	Nick Jagers
Position	Head of Operations
Signature	
Date	13 March 2024

## 6 Revision History

Revision Date	Reviser	Description of Revision
12/03/2024	Nick Jagers	Adapted from Bluesource's Corporate and Social Responsibility Policy