



SUPPLIER CODE OF CONDUCT

Issue date: 1st of June 2025
Last modification:

CODE OF CONDUCT FOR SUPPLIERS¹

Introduction

TINC, as an infrastructure investor, recognizes the critical role that its suppliers play in ensuring the success of its investment activities. TINC's commitment to sustainability, ethical business practices, and the well-being of the communities where TINC operates is a core value. This Supplier Code of Conduct aims at supporting TINC's integrity and safeguarding its reputation as a reliable business partner by setting forth the standards of behavior and responsibilities expected of suppliers, contractors, and other business partners of TINC.

By adhering to this Code, TINC wants to ensure that suppliers operate in a manner that aligns with TINC's ethical values, complies with applicable laws and regulations, and contributes to the positive social, economic, and environmental impact of the infrastructure investments of TINC.

1. Legal Compliance

Suppliers shall comply with all applicable laws, regulations, and industry standards in the jurisdictions where they operate. This includes, but is not limited to, labor laws, environmental regulations, anti-bribery and corruption laws, and health and safety standards.

- **Adherence to Laws:** Suppliers shall comply with all relevant national, regional, and local laws, including those related to the environment, human rights, labor standards, and anti-corruption.
- **Permits and Certifications:** Suppliers should ensure all required permits and certifications are in place and up to date.

2. Ethical Business Conduct

Integrity and transparency are foundational to the relationship of TINC with suppliers. TINC expects its suppliers to maintain the highest ethical standards in their business dealings.

- **Anti-Bribery and Corruption:** Suppliers shall not engage in or tolerate any form of bribery or corruption, including offering, giving, soliciting, or receiving any form of financial or non-financial benefit to influence business decisions.
- **Fair Competition:** Suppliers shall engage in fair competition and refrain from business practices such as improper exchange of competitive information, arrangements unlawfully restraining competition, price fixing, bid rigging or improper market allocation. Suppliers shall respect intellectual property rights, including patents, trademarks, and copyrights.
- **Conflict of Interest:** Suppliers shall avoid conflicts of interest (i.e. circumstances containing a risk that professional judgment or actions could be compromised by other, reasonably deemed, incompatible interests) and are expected to disclose as soon as possible any situations where such a conflict may arise.
- **Subcontracting:** If suppliers subcontract any work, they are responsible for ensuring that subcontractors also adhere to this Code of Conduct.

¹ Supplier means any supplier of goods and/or services that are part of the TINC supply chain. All references in this Code of conduct to "Suppliers" mean Suppliers as well as their affiliates.

3. Labor and Human Rights

TINC is committed to promoting human rights and ensuring that all individuals in the supply chain are treated with dignity and respect.

- **Human Rights:** Suppliers shall respect all internationally proclaimed human rights, particularly the UN Bill of Human Rights and act in accordance with the labour standards of the International Labour Organisation (ILO)
- **Child and Forced Labor:** Suppliers shall not engage in or support any form of child labor or forced labor. All workers should be of legal age as defined by local law and shall work voluntarily.
- **Non-Discrimination:** Suppliers should not discriminate based on race, color, religion and belief, gender, sexual orientation, age, disability (physical or mental), nationality, marital status, pregnancy, union status, political opinion or other characteristics protected by law.
- **Fair Treatment and Wages:** Suppliers shall provide fair wages and benefits to workers, ensuring compensation that meets or exceeds legal requirements and industry standards. Workers should also receive clear information about their terms of employment in compliance with the standards of the ILO.
- **Respect and Equal Opportunities:** Suppliers shall maintain a culture of respect and equal opportunity with respect to employment.
- **Freedom of Association:** Suppliers shall respect workers' freedom of association regarding working conditions, the right to join trade unions, form work councils and conduct work-related (collective) negotiations.

4. Health, Safety, and Well-being

Suppliers are expected to provide a safe and healthy working environment for their employees and contractors.

- **Workplace Safety:** Suppliers shall implement appropriate health and safety measures to prevent accidents and ensure the physical and mental well-being of workers.
- **Training and Emergency Preparedness:** Suppliers should provide regular training on safety procedures and ensure that emergency response plans are in place and well-communicated.

5. Environmental Responsibility

TINC is committed to reducing the direct environmental impact as an organization and the indirect impact through its investments and expects suppliers to align with these objectives.

- **Sustainability:** Suppliers should implement environmental management practices to reduce the impact of their operations, including waste, energy, and water consumption.
- **Compliance with Environmental Regulations:** Suppliers shall comply with all relevant environmental laws and regulations, including those related to pollution, emissions, and hazardous waste.
- **Sustainable Materials and Practices:** Suppliers should strive to use environmentally sustainable materials and practices in the delivery of their products and services.

6. ICT Security and Integrity

As an infrastructure investor, TINC embraces the transformative power of technology to drive innovation, efficiency, and sustainability. TINC is also committed to safeguard the integrity of non-public information and data regarding itself and its partners and stakeholders.

- **Data Protection:** Suppliers shall ensure that all personal, sensitive, and proprietary data of TINC and/or its stakeholders is protected from unauthorized access or misuse. All technology systems shall comply with data protection laws, including GDPR or other applicable regulations, ensuring that data is securely stored, processed, and transferred.
- **Use of Technology:** Suppliers shall adopt responsible practices when using technology (incl. artificial intelligence ('AI'), data, automation systems and other emerging technologies in compliance with ethical standards and applicable laws.

7. Community Engagement and Social Impact

Suppliers should support efforts that contribute positively to the communities where they operate.

- **Community Development:** Suppliers should consider the social and economic impacts of their operations on local communities and seek to minimize any negative effects while maximizing positive contributions.
- **Respect for Local Culture and Traditions:** Suppliers shall respect the culture, traditions, and rights of communities where they operate and seek to engage with stakeholders in an inclusive and transparent manner.

8. Reporting and Enforcement

- **Monitoring:** Suppliers shall cooperate with TINC with respect to questions regarding the compliance with the provisions of this Code of Conduct.
- **Training and Education:** Suppliers are expected to provide adequate training to their employees and representatives regarding the topics contained in this Code of Conduct.
- **Reporting Violations:** Suppliers shall have processes in place to report any violations of this Code of Conduct. TINC encourages suppliers to report any concerns regarding unethical or illegal behavior without fear of retaliation.
- **Corrective Actions:** If a supplier is found to be in violation of this Code, TINC will work with them to address the issue and implement corrective actions.
- **Termination of Relationship:** If the violation is severe or if the supplier fails to make the necessary improvements, TINC may terminate the relationship with the supplier.

Acknowledgment

By working with TINC, suppliers agree to uphold the principles and commitments outlined in this Supplier Code of Conduct. TINC expects all suppliers to actively promote and integrate these standards into their daily operations and supply chains.
