Supplier Code of Conduct

eDist

Document Control	Detail
Document classification	External – Supplier and Business Partner Requirements
Company name	eDist
Approved by	COO
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Review frequency	Annually or as required

1. Purpose

eDist is committed to conducting business responsibly, ethically, and sustainably. We expect all suppliers, vendors, contractors, consultants, service providers, and business partners to uphold high standards of integrity, accountability, and responsible business conduct.

This Supplier Code of Conduct establishes the minimum standards and expectations that suppliers must follow when conducting business with or providing goods and services to eDist.

The purpose of this Code is to ensure that suppliers operate in compliance with applicable laws and regulations, respect human rights, maintain safe working environments, protect the environment, and conduct business ethically.

eDist expects its suppliers to communicate these requirements to their employees, subcontractors, agents, and other relevant business partners involved in providing goods or services to eDist.

2. Scope and Applicability

This Supplier Code of Conduct applies to all suppliers and external business partners, including:

- Suppliers and vendors.
- Contractors and subcontractors.
- Consultants and professional service providers.
- Agents, brokers, and intermediaries.
- Distributors and representatives.
- Logistics and transportation providers.
- Temporary labor providers.
- Joint venture partners and other relevant business associates.

Suppliers are responsible for ensuring that their employees, representatives, subcontractors, and relevant business partners comply with the applicable requirements of this Code when performing work or providing services to eDist.

This Code should be read together with applicable contractual agreements, purchase orders, and other relevant eDist policies and procedures.

3. Compliance with Laws and Regulations

Suppliers must comply with all applicable local, national, and international laws, regulations, and industry requirements relevant to their business activities. This includes, where applicable:

- Employment and labor laws.
- Anti-bribery and anti-corruption laws.
- Health and safety regulations.
- Environmental regulations.
- Data protection and privacy requirements.
- Competition and antitrust laws.
- Trade, customs, and export control regulations.
- Applicable human rights requirements.

Where the requirements of this Code exceed the minimum requirements of applicable laws, suppliers are expected to meet the higher standard to the extent legally permissible.

4. Business Ethics and Integrity

Suppliers must conduct business honestly, fairly, transparently, and professionally. Suppliers must:

- Avoid dishonest, fraudulent, or deceptive business practices.
- Maintain accurate business and financial records.
- Avoid misleading representations or false documentation.
- Disclose relevant conflicts of interest.
- Protect confidential business information.
- Respect intellectual property rights.

- Compete fairly and comply with applicable competition laws.
- Avoid any conduct that could damage eDist's reputation or business interests.

Suppliers must not engage in fraud, misrepresentation, collusion, money laundering, or other unethical business activities.

5. Anti-Bribery and Anti-Corruption

eDist maintains a zero-tolerance approach to bribery and corruption.

Suppliers must comply with all applicable anti-bribery and anti-corruption laws and must not directly or indirectly offer, promise, authorize, give, request, or accept anything of value to improperly influence a business decision or obtain an unfair advantage. Prohibited activities include:

- Bribery and kickbacks.
- Facilitation payments.
- Improper gifts or hospitality.
- Unauthorized commissions or payments.
- Improper benefits to government officials.
- Payments intended to influence procurement or contract decisions.
- Using intermediaries or third parties to make improper payments.

Suppliers must not offer gifts, entertainment, hospitality, personal favors, or other benefits to eDist employees to influence purchasing decisions, contract awards, or business relationships.

Any request for an improper payment or benefit involving eDist must be reported through eDist's designated reporting channels.

6. Dealings with Government Officials

Suppliers must conduct all interactions with government officials ethically, transparently, and in accordance with applicable laws.

Government officials include government employees, elected or appointed officials, regulatory authorities, customs officers, law enforcement personnel, employees of state-owned or state-controlled enterprises, and individuals acting on behalf of government authorities. Suppliers must not:

- Offer or provide bribes or improper benefits to government officials.
- Make unofficial payments to obtain permits, licenses, approvals, or other government services.
- Attempt to improperly influence government inspections, audits, tenders, or regulatory decisions.
- Use third parties to make improper payments on their behalf.
- Provide gifts, hospitality, travel, or entertainment intended to influence official decisions.

Suppliers representing or acting on behalf of eDist in government-related matters must comply with eDist's applicable ABAC requirements and contractual obligations.

7. Gifts, Hospitality and Entertainment

Suppliers must not offer gifts, meals, entertainment, travel, hospitality, or other personal benefits to eDist employees with the intention of influencing business decisions or obtaining preferential treatment.

Any permitted business hospitality must be reasonable, transparent, proportionate, and consistent with applicable laws and eDist's policies. Suppliers must not:

- Offer cash or cash equivalents to eDist employees.
- Offer lavish or excessive entertainment.
- Provide personal favors or benefits.
- Offer gifts during active procurement or contract negotiations with the intention of influencing decisions.
- Provide benefits that create an actual or perceived conflict of interest.

eDist reserves the right to reject or return inappropriate gifts or hospitality.

8. Conflicts of Interest

Suppliers must disclose any actual, potential, or perceived conflicts of interest that may affect their business relationship with eDist. Examples include:

- Financial or ownership relationships with eDist employees.
- Family or personal relationships that may influence procurement decisions.
- Undisclosed interests in competing suppliers or service providers.
- Relationships with government officials that may influence eDist-related transactions.

Suppliers must promptly notify eDist of any relevant conflicts and cooperate with reasonable measures to address them.

9. Human Rights and Labor Practices

Suppliers must respect internationally recognized human rights and treat all employees with dignity, fairness, and respect.

9.1 Prohibition of Forced Labor

Suppliers must:

- Prohibit forced, bonded, indentured, or involuntary labor.
- Prohibit human trafficking and modern slavery.

- Ensure employees are free to leave employment in accordance with applicable laws.
- Not retain employee passports, identification documents, or personal belongings as a means of restricting freedom.

9.2 Prohibition of Child Labor

Suppliers must:

- Comply with applicable minimum working age laws.
- Prohibit illegal child labor.
- Ensure young workers are not assigned hazardous work or work that interferes with education or development.

9.3 Fair Employment Practices

Suppliers must:

- Provide fair and lawful wages and benefits.
- Comply with working hour and overtime requirements.
- Provide legally required rest periods and leave.
- Maintain accurate employment and payroll records.

9.4 Non-Discrimination and Equal Opportunity

Suppliers must prohibit discrimination, harassment, intimidation, and abusive treatment based on legally protected characteristics. Employees must be treated fairly regardless of their background, gender, age, disability, nationality, religion, or other protected status under applicable laws.

9.5 Freedom of Association

Suppliers must respect employees' lawful rights to freedom of association, collective bargaining, and participation in employee organizations.

10. Health and Safety

Suppliers must provide safe and healthy working conditions for their employees and anyone affected by their business activities. Suppliers must:

- Comply with applicable occupational health and safety regulations.
- Identify and assess workplace hazards.
- Implement appropriate risk controls.
- Provide suitable personal protective equipment where required.
- Provide relevant health and safety training.
- Maintain appropriate emergency response procedures.
- Report serious workplace incidents and accidents as required.
- Maintain safe equipment, machinery, and working environments.

Suppliers performing work at eDist premises must comply with eDist's site-specific health and safety requirements.

11. Environmental Responsibility

Suppliers are expected to operate responsibly and minimize the environmental impact of their business activities. Suppliers must:

- Comply with applicable environmental laws and regulations.
- Manage waste responsibly.
- Prevent pollution and environmental contamination.
- Handle hazardous materials safely.
- Use energy, water, and natural resources responsibly.
- Maintain appropriate environmental permits and licenses.
- Report significant environmental incidents where required.
- Implement reasonable measures to reduce environmental impacts.

Where relevant, suppliers are encouraged to improve resource efficiency, reduce emissions, and adopt sustainable business practices.

12. Data Protection and Confidentiality

Suppliers must protect confidential, sensitive, and proprietary information obtained through their business relationship with eDist. Suppliers must:

- Maintain appropriate information security controls.
- Protect personal and confidential data.
- Comply with applicable data protection and privacy laws.
- Restrict access to information to authorized individuals.
- Prevent unauthorized disclosure, use, or transfer of eDist information.
- Report suspected data breaches or security incidents promptly.

Suppliers must not use eDist information for personal gain or unauthorized commercial purposes.

13. Responsible Sourcing and Supply Chain Management

Suppliers are expected to maintain responsible sourcing practices throughout their supply chains. Suppliers should:

- Understand the origin of materials and products supplied to eDist.
- Avoid sourcing materials through unlawful or unethical practices.
- Conduct appropriate due diligence on their own suppliers and subcontractors.
- Identify and address human rights, environmental, and ethical risks.

- Maintain reasonable traceability of relevant materials and products.
- Communicate applicable ethical and compliance expectations to their subcontractors.

Suppliers must not knowingly engage in activities involving illegal sourcing, trafficking, or other serious human rights violations.

14. Financial Integrity and Record-Keeping

Suppliers must maintain accurate and complete records relating to transactions with eDist. This includes:

- Invoices and payment records.
- Purchase orders and contracts.
- Delivery and service records.
- Expense claims.
- Tax and customs documentation.
- Relevant compliance documentation.

Suppliers must not submit false invoices, misrepresent services, manipulate records, or conceal improper payments. All transactions must reflect genuine business activities and be supported by appropriate documentation.

15. Subcontractors and Business Partners

Suppliers must ensure that subcontractors, agents, and other relevant business partners involved in delivering goods or services to eDist comply with the applicable requirements of this Code.

Suppliers should conduct appropriate due diligence and monitor their subcontractors based on the nature and level of risk. Suppliers remain responsible for the performance of their contractual obligations and must promptly notify eDist of significant compliance concerns involving their supply chain.

16. Reporting and Whistleblowing

Suppliers must report suspected violations of this Code, including bribery, corruption, fraud, human rights violations, serious safety concerns, environmental misconduct, and unethical business practices. Reports may be submitted through eDist's designated reporting channels:

Reporting Channel	Contact Details	
Reporting contact	Nick Villaume	nick.villaume@edist.com
Whistleblowing channel	eDist CA website	

eDist will handle reports appropriately and expects suppliers to cooperate with relevant investigations. eDist prohibits retaliation against individuals who raise genuine concerns or report suspected misconduct in good faith.

17. Monitoring, Assessment and Audit Rights

eDist reserves the right to assess supplier compliance with this Code through reasonable and appropriate monitoring activities. These activities may include:

- Supplier self-assessment questionnaires.
- Compliance declarations.
- Review of relevant documentation.
- Risk-based supplier evaluations.
- On-site assessments or audits, subject to contractual arrangements and applicable laws.
- Corrective action follow-ups.

Suppliers are expected to cooperate with reasonable compliance assessments and provide accurate information when requested.

18. Non-Compliance and Corrective Action

Where a supplier fails to comply with this Code, eDist may require corrective actions within an agreed timeframe. Depending on the nature and severity of the violation, eDist may:

- Request an explanation or supporting documentation.
- Require a corrective action plan.
- Increase supplier monitoring.
- Suspend specific activities or orders.
- Suspend or terminate the supplier relationship.
- Exercise contractual remedies.
- Refer serious suspected violations to relevant authorities where appropriate.

Serious violations, including bribery, corruption, forced labor, human trafficking, or deliberate falsification of records, may result in immediate action in accordance with applicable contractual terms and laws.

19. Continuous Improvement

eDist encourages suppliers to continuously improve their ethical, environmental, social, and governance practices. Suppliers are encouraged to establish their own policies, management systems, training programs, and internal controls to support compliance with this Code.

eDist may periodically review and update this Code to reflect changes in applicable laws, regulations, business practices, and sustainability expectations.

20. Supplier Acknowledgment and Acceptance

The supplier confirms that it has received, read, and understood eDist's Supplier Code of Conduct.

The supplier agrees to comply with the applicable requirements of this Code when conducting business with or providing goods and services to eDist. The supplier further agrees to communicate relevant requirements to its employees, representatives, and subcontractors involved in performing work for eDist.

The supplier acknowledges that failure to comply with applicable requirements may result in corrective action, suspension, or termination of the business relationship, subject to applicable contractual terms and laws.

Supplier Details

Field	Supplier Entry
Supplier / company name	
Authorized representative	
Position / title	
Email address	
Telephone number	
Date of acknowledgment	

Declaration

I confirm that I am authorized to represent the supplier and acknowledge the requirements of this Supplier Code of Conduct.

Declaration	Supplier Entry
Authorized representative signature	
Date	