

Business Partner Code of Conduct

Preamble

This Business Partner Code of Conduct outlines the principles and values that **Zeno** expects its Business Partners to follow.

Zeno and its subsidiaries highly value the participation of its partners in adhering to rules and principles concerning environmental and social responsibility. Integrity, ethics, transparency, respect for individuals, and the fight against corruption and unfair competition are core values that each partner of **Zeno** should uphold in their collaboration with the company and their activities.

1. Zeno's Values Towards Business Partners

Zeno takes adherence to environmental and ethical values seriously and is committed to maintaining these values. This includes a strong dedication to fostering trustworthy relationships with business partners. Specifically, **Zeno** is committed to the following values:

1.1 Partnership

- Foster a trustworthy relationship with our business partners.
- Conduct business with respect for partners and their employees.

1.2 Environment

- Focus on sustainable purchasing practices.
- Encourage adherence to health and environmental regulations.

1.3 Confidentiality

- Uphold rules regarding the protection of personal data and respect for trade secrets.

1.4 Corruption

- Follow and enforce regulations that prevent active and passive corruption and money laundering.

2. Business Partner Commitments

Zeno's business partners, especially suppliers and subcontractors, must comply with internationally recognized ethical, social, and environmental standards while fulfilling their obligations to **Zeno** and its customers.

2.1 Compliance with Laws and Regulations

Business partners must adhere to all applicable laws and regulations in the countries where they operate, particularly in relation to:

- Fair competition rules
- Human, labor, and social rights

- Environmental protection
- Business ethics practices, including anti-corruption
- Protection of resources, including information and data

2.2 Compliance with Social and Human Rights

Zeno expects its business partners to respect human rights and adhere to labor standards, including but not limited to:

- Prevention of illegal work: Business partners must comply with all regulations to prevent illegal, clandestine, or undeclared work.
- Prevention of employing foreign workers without a work permit: Partners must not employ any foreigner who does not hold the required work authorization.
- Compliance with local labor laws: Business partners must ensure compliance with local labor regulations, permitting **Zeno** to perform necessary checks where legally required.
- Prevention of forced labor: The use of forced labor, slavery, human trafficking, or practices like withholding identity papers or work permits is strictly prohibited.
- Prohibition of child labor: Business partners must contribute to the elimination of child labor, ensuring the minimum age for employment aligns with applicable legal standards.
- Harassment Prevention: Business partners must provide a workplace free from harassment.
- Prevention of discrimination: Business partners must work actively to prevent and eliminate discrimination in employment.
- Health and safety: Business partners must provide a safe and healthy working environment to prevent accidents and injuries.

2.3 Compliance with Ethical Conduct

Business partners must conduct their operations with integrity and transparency, including but not limited to:

- Corruption Prevention: Business partners should not solicit or accept gifts or favors outside of modest professional customs.
- Prevention of conflicts of interest: Business partners should avoid situations that might suggest a conflict between personal and professional interests.
- Prevention of money laundering: Business partners must take measures to prevent their operations from being exploited for money laundering.
- Fraud Prevention: Business partners must avoid engaging in fraudulent activities and must not use criminal funds for providing services.
- Information Security: Business partners must ensure the confidentiality of professional secrets and non-public information shared in the business relationship with **Zeno**.

2.4 Environmental and Social Responsibility Compliance

Zeno is dedicated to minimizing its environmental impact and expects its partners to adhere to environmental and social responsibility principles.

- Business partners must comply with all applicable environmental regulations.

- Partners should work to minimize their environmental footprint and promote resource efficiency, waste reduction, and climate action.

2.5 Quality Standards Compliance

Business partners must maintain appropriate quality levels and the skills necessary to execute their contractual responsibilities.

- Business partners must invest in their skills and quality systems to ensure optimal performance.
- Partners should demonstrate adaptability and innovation in a constantly evolving business environment.
- Business partners must align their practices with recognized business standards and keep them up to date.

2.6 Control and Governance

To ensure compliance with legal, regulatory, and ethical standards, business partners should implement effective measures.

- Partners must maintain an effective whistleblowing system.
- Business partners must monitor and report on their compliance, providing evidence upon request.
- Partners must require their own suppliers and subcontractors to comply with these standards.

2.7 Auditing

Zeno reserves the right to audit compliance with this Business Partner Code of Conduct, either directly or through third-party auditors. Any significant breach of these standards may result in the termination of the business agreement, without affecting any other rights **Zeno** may hold.