

SUPPLIER CODE OF CONDUCT

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INTRODUCTION

At Fed-Hub our values (Client Value, Leadership by Example, Integrity, Fairness and Execution Excellence) form the bedrock of our endeavours as a responsible business. We firmly believe that our Suppliers are an integral part of our ecosystem, and we are committed to create an environment where our Suppliers are confident that they are treated with respect. This Supplier Code of Conduct ("Supplier Code") details the expectations that Fed-Hub has from its Supplier and applies to Fed-Hub Limited and its subsidiaries ("Fed-Hub"). The term "Supplier" means any entity or person that sells, or seeks to sell goods or services, to Fed-Hub or its subsidiaries, including the Supplier's employees, agents, and other representatives. Fed-Hub has classified its suppliers into three major categories.

- a. Suppliers of People: Suppliers (business and support) who provide manpower to Fed-Hub. The manpower assigned to Fed-Hub works at Fed-Hub and/or its client locations as an integral part of the workforce.
- b. Suppliers of Services: Suppliers who provide essential services (such as catering, food and beverage counters, transportation, construction) at Fed-Hub locations.
- c. Suppliers of Products: Suppliers who supply products to Fed-Hub (such as hardware, software, electrical / electronic equipment, furniture, heavy equipment, stationery etc.) across Fed-Hub locations.

Fed-Hub firmly believes in conducting all business transactions with integrity and transparency and ensures that it is ethical, sincere, and open in all its transactions. We expect our Suppliers to uphold the values of integrity and ethics in all business dealings. The Supplier Code is made up of six sections followed by a list of Dos and Don'ts. Sections A, B, C and D outline standards for Ethics and Compliance, Labor Practices and Human Rights, Health & Safety and Environment respectively. Section E covers management system to be put in place by the Suppliers and obligations of Suppliers. Section F provides avenues for reporting concerns in event of breach of the Supplier Code.

A. ETHICS AND COMPLIANCE WITH LAWS

Fed-Hub enjoys a hard-won reputation for honesty, integrity and fair dealing. Without question, this reputation for integrity is an invaluable part of our success. We expect our Suppliers to partner with us with integrity and in an ethical manner.

1. Business Integrity and Ethics

As a global company, Fed-Hub is subject to all relevant anti-bribery and corruption laws including, but not limited to, Prevention of Corruption Act, 1988 (India), the U.S. Foreign Corrupt Practices Act (FCPA) and Bribery Act 2010 (U.K.) as amended from time to time. The Suppliers should ensure that they comply with the relevant anti-bribery and corruption laws in both letter and in spirit. Fed-Hub has a zero-tolerance policy with respect to any form bribery and/or corruption. Bribery and corruption are against our C-LIFE values. Fed-Hub does not permit such actions, nor do we allow third parties acting on our behalf, such as agents, consultants, Suppliers and contractors to make any such payments. Suppliers shall ensure the following.

- Implement monitoring and enforcement procedures to ensure compliance with anti-bribery and corruption laws;

- Raise invoices and claims in line with the agreed services and supplies, along with the supporting documents; Perform all business dealings transparently and maintain accurate details of the same in business books and records;
- Never offer, directly or indirectly, any form of gift, entertainment or anything of value to anyone on behalf of Fed-Hub including government officials, customers or their representatives to obtain or retain business; influence business decisions; and/or secure an unfair advantage;
- Abstain from offering any bribe, kickbacks and/or facilitation payments.

2. Conflict of Interest

This includes situations where an Fed-Hub employee or director may have an interest of any kind in the Supplier's business, whether through personal relationships, investments, directorships or any kind of economic ties with the Supplier. In event of any conflict of interest arising at the time of empanelment or prior/post/during engagement, Suppliers shall promptly disclose such situations to Fed-Hub.

3. Quality & Product responsibility

Suppliers shall ensure that the quality of product/service delivered shall be in-line with all the contract terms and conditions. Suppliers shall adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances, including labelling of products, if required.

4. Fair Business, Advertising and Competition

Suppliers shall uphold standards of fair business, advertising and competition. Suppliers shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of applicable antitrust laws.

5. International Trade

Suppliers shall adhere to all laws and regulations¹ pertaining to export, re-export, import, or transfer of any controlled technology, product and/or services. Without limitation, Suppliers shall:

- I. Adhere to laws and regulations pertaining to commercial transactions with sanctioned/embargoed country or individual or entity.
- II. Disclose any history of violation of export control laws or sanctions.
- III. Disclose any ongoing inquiry or investigation:
 - a. if information regarding the same is available in public domain; or
 - b. if such inquiry/investigation has any impact on the engagement with Fed-Hub.
- IV. Ensure that Fed-Hub' products and/or services are not used or supplied to any sanctioned/ embargoed country or individual or entity.

6. Confidentiality

Suppliers shall ensure that confidential or proprietary information about Fed-Hub, our clients, employees or other parties, which has been gained through employment or affiliation with Fed-Hub, is not used for personal or professional advantage. The confidential information also extends to any employee data, personal data or third-party information as shared by Fed-Hub.

7. Intellectual Property Rights

Suppliers shall take all steps to adhere to the intellectual property rights of Fed-Hub including but not limited to the Fed-Hub copyrights, patents, trade secrets and trademarks.

8. Data Privacy

Fed-Hub along with its subsidiaries ensures that it complies with all applicable data protection laws and contractual requirements. Fed-Hub is committed to uphold highest data protection and privacy standards with respect to all Supplier data and Personally Identifiable Information² also referred to as Personal Data. We expect our Suppliers³ to adhere to similar standards, when processing such Personal Data, including sensitive personal information.

9. Information Security

Fed-Hub has a holistic Supplier Information security risk assurance process which helps in identification of Information security risks through different stages of supplier relations with the end objective of safeguarding critical & sensitive information; and information systems handled by suppliers. Fed-Hub expects its suppliers to comply with the applicable laws and regulations and Fed-Hub security requirements as communicated from time to time and included under the agreement. Supplier organization is responsible for agreeing on service deliverables, ensuring compliance against contractual security requirements, extending support on annual security assessments, ensuring timely notification of incidents and notifying major changes/vulnerabilities to Fed-Hub. Supplier is expected to comply with the following as applicable: a. Ensure that adequate security controls and practices are implemented and maintained effectively to ensure sufficient protection of Confidentiality, Integrity, and availability of

- i. Services provided to Fed-Hub and
- ii. Fed-Hub or Fed-Hub' client data processed or stored by the service provider.

Upon becoming aware of any security incident/breach involving Fed-Hub or Fed-Hub' client data, notify Fed-Hub within 48 hours on support@fedhubsoftware.com

10. Fed-Hub Brand Name and Logo, Media Rights

Our logo is the most prominent symbol of our products, platforms, and services. The Suppliers shall ensure the following.

- All usage of the Fed-Hub logo must strictly adhere to Fed-Hub brand guidelines with respect to color, appearance and size.
- All manifestations of the Fed-Hub brand including but not limited to case studies, brochures and advertisements must be in accordance with established brand guidelines;
- Suppliers shall not use Fed-Hub brand name, logo or any other visual vehicles implying or representing Fed-Hub without explicit consent Suppliers shall not make any comments about their engagement with Fed-Hub in the media without prior approval. The specific content of any media report and/or comments and details of usage shall be shared for approval with Fed-Hub.

B. LABOR PRACTICES AND HUMAN RIGHTS

Fed-Hub is committed to uphold human rights of the workers and treating them with dignity and respect.

1. Wages and Benefits

Suppliers shall comply with all applicable wage laws and regulations including, but not limited, to minimum wages, duration of payment, overtime hours, equal remuneration and other elements of compensation. All legally mandated benefits viz. leaves, social security, insurance etc. shall be provided by the Suppliers to its employees. Deductions, if any, from wages shall be made in strict compliance with the applicable laws. Suppliers shall not use deductions from wages as a disciplinary measure.

2. Working hours

Suppliers shall comply with prevailing applicable laws and regulations on working hours and minimum wages, overtime and maximum hours. Suppliers shall carry out its business in a manner that limits overtime to a level that ensures humane and productive working conditions.

3. Child labor

Suppliers shall not employ, engage or otherwise use any child labor. Fed-Hub expects its suppliers to not engage in any practice inconsistent with the rights set forth in the Convention on the Rights of the Child, ILO Minimum Age Convention and Prohibition and Immediate Elimination of the Worst Forms of Child Labor Convention. The term 'child' refers to any person employed normally under the age of 18 where the law of the country permits, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

4. Forced or compulsory labor/Human Trafficking

Suppliers shall not engage in any instance of forced, bonded or compulsory labor and/or slavery or trafficking of people in their supply chain. All employment with Suppliers shall be voluntary and employees shall be free to leave their employment in compliance with applicable laws. Supplier shall not confiscate or request the workers to surrender any government-issued identification, passports or work permits as a condition of employment unless required as per applicable laws. Workers shall not be required to pay Suppliers recruitment fees or other related fees for their employment.

5. Human Rights

Fed-Hub expects its Suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses. Suppliers shall not tolerate any instance of harsh and inhumane treatment including but, not limited to, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, including the threat of any such treatment. Suppliers shall clearly lay down and communicate to workers the disciplinary policies and procedures in this regard. Suppliers shall have a written policy that bans any form of discrimination, harassment and/or bullying⁴ and provides for a grievance mechanism to address any concerns raised by its employees.

6. Non-Discrimination

Suppliers shall not discriminate in hiring or employment practices based on pregnancy, childbirth or related medical conditions, race, religious creed, colour, sex, gender, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, union membership or any other criteria protected under law. Suppliers shall uphold the dignity of its employees at all times and work towards establishing and reinforcing a positive work culture.

Any intentional act that causes harm to others, and may involve verbal harassment, verbal or non-verbal threats, physical assault, stalking, or other methods of coercion such as manipulation, blackmail, or extortion.

7. Freedom of Association and Collective Bargaining

Fed-Hub expects its Suppliers to respect and recognize the rights of its employees to freely associate, organize and bargain collectively.

8. Harassment

Fed-Hub expects its Suppliers to provide a harassment-free workplace for everyone. Harassment based on any protected criteria is unlawful and the Suppliers shall not commit any act, which is not in compliance with applicable laws. Fed-Hub has a zero-tolerance policy with respect to any form of harassment including sexual harassment and the Suppliers shall take appropriate initiative to ensure a harassment-free workplace by way of publication of policies, periodic trainings and requisite & timely support to affected parties. Suppliers shall also organize awareness programs at regular intervals for sensitizing the employees on the law pertaining to harassment in the applicable jurisdiction. Kindly refer to the 'Reporting Concerns' section for Fed-Hub channels vide which any harassment related grievances can be raised.

C. HEALTH AND SAFETY

Fed-Hub expects its Suppliers to provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Suppliers shall provide their employees safe and healthy workplace, which is in compliance with all applicable safety and health laws, regulations, and practices. Suppliers shall ensure that all legal requirements including but not limited to occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing are addressed. Suppliers shall take adequate steps to minimize the causes of hazards inherent in the working environment. Suppliers shall take adequate steps to address the issue of substance abuse and shall prohibit the use, possession, distribution or sale of illegal drugs in their supply chain.

D. ENVIRONMENT & COMMUNITY

Suppliers shall develop, implement, and maintain environmentally responsible business practices. We expect our Suppliers to adhere to Fed-Hub standards on environmental protection and work towards following objectives while transparently reporting on their efforts:

- Energy and Emissions: monitor energy consumption, move to renewable sources of energy and reduce GHG emissions
- Water: reduce the consumption of freshwater, reuse and recycle wastewater
- Waste: segregate waste at source and adopt scientific practices in waste disposal and eliminate single use plastic from their operations. Monitor pollution of air, land, water (and noise pollution) and make necessary efforts to eliminate pollution
- Biodiversity: Protect biodiversity and preserve flora and fauna.