



OXIMIO
Gibson House,
Ermine Business Park,
Huntingdon,
PE29 6XU

29 October 2024.

THIRD PARTY CODE OF CONDUCT

INTRODUCTION

At Oximio, we are dedicated to upholding the highest ethical standards, based on principles such as quality, honesty, equality, respect, and responsibility. Our approach is guided by a set of principles that align with our ethical responsibilities, ensuring the sustainability of our business. We endeavour to do business with Third Parties who share our values.

This Third Party Code of Conduct (“the Code”) sets the minimum standards of business conduct Oximio expects from its Third Parties. Third Parties are expected to ensure that their personnel and external parties also meet the same standards of business conduct.

MANAGEMENT SYSTEMS

Compliance with Laws

Third Parties shall comply with applicable laws, regulations, and the Code. Oximio expects Third Parties to employ policies, procedures, and training to provide this compliance as well as to maintain appropriate documentation demonstrating their adherence to the expectations.

Monitoring and Auditing

Oximio expects Third Parties to establish and actively operate assessment mechanisms to monitor their compliance with laws, sector-related requirements, and the Code.

Oximio may conduct risk-based reviews of Third Parties for compliance assessment purposes. Third Parties are expected to provide complete and truthful information to support these assessments upon request.

ETHICAL BUSINESS PRACTICES

Anti-Bribery and Anti-Corruption

Oximio has a zero-tolerance policy on corruption and bribery in any form. Third Parties’ personnel and representatives are strictly prohibited from offering, paying, promising, or authorising kickbacks, facilitation payments, bribes, or any other forms of transfer of value, directly or indirectly, in order to obtain or retain business. Third Parties shall maintain their fair and ethical business without engaging or assisting in improper payments and abuse of authority for personal or business gain.



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Conflicts of Interest

Oximio prioritises avoiding adverse effects of any actual and potential conflicts of interest on its business operations. Third Parties are expected to prevent conflict of interest through specific measures to be able to carry out business without being improperly influenced by any personal interest.

Anti-Trust and Fair Competition

Oximio encourages fair competition and is committed to follow antitrust laws. Third Parties are expected to conduct business through fair competition principles upholding the highest standards of law-abiding antitrust conduct and integrity.

Data Protection and Security

Third Parties shall adhere to all applicable data protection and privacy laws. Personal data shall be protected by Third Parties against any unlawful use by appropriate technical and organisational measures. Confidentiality, integrity, availability, and resilience of the processing systems shall be ensured to safeguard information.

Anti Money-Laundering

Third Parties shall not engage or assist in any money laundering process through acquiring, concealing, disguising, retaining, or using the proceeds of crime.

Sanctions

Third Parties shall comply with all applicable economic and trade sanctions, including the respective sanctions lists of the US, UK and the EU; and safeguard against any dealings with restricted governments, entities, and individuals.

Business activities involving individuals or entities related to Russia, directly or indirectly, or business activities that may provide benefit to the Russian government, must be critically analysed under compliance regulations due to high sanctions risk. Considering the Russian invasion and its actions threatening Ukraine's territorial integrity and sovereignty, Third Parties shall not have any ultimate beneficial owners with tax liabilities to the Russian government.



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LABOR RIGHTS

Non-Discrimination

Third Parties should provide equal employment opportunities and maintain a workplace that is inclusive and free from discrimination based on characteristics protected by applicable law.

Health and Safety Working Environment

In order to provide a healthy and safe working environment, activities within all Oximio locations comply with regulations and sector-related requirements.

Third Parties are expected to do the same while conducting their business. A healthy and safe work environment is expected to be maintained by taking necessary precautions.

SPEAK-UP

Oximio endeavours to maintain a transparent business environment and high business ethics. Third Parties and their employees are expected to report any misconduct regarding compliance with applicable laws and Oximio policies by submitting relevant reports through: <https://report.whistleb.com/en/oximio>.