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Partner & Supplier Code of Conduct

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1. Introduction

10x Banking is committed to being responsible and ethical, and we expect our suppliers and partners to share these values. This code of conduct outlines our expectations for all suppliers who provide goods and services to our company and partners who are involved in, or are about to be involved in, business activities with us. By agreeing to do business with 10x, suppliers and partners are expected to adhere to this code of conduct.

2. Legal and regulatory compliance

Suppliers and partners need to be aware of and follow all applicable laws and regulations in the countries where they operate. Suppliers and partners must let us know as soon as possible when becoming aware of an actual, suspected or potential breach of applicable laws related to labour, environment, health and safety, data protection and privacy, anti-bribery, anti-corruption, and trade regulations.

Suppliers and partners are expected to protect confidential information and should have the processes in place to ensure this. This includes information that they access, receive or process on behalf of 10x or our clients and customers. Unauthorised use or disclosure of confidential information may have personal, legal, reputational and financial consequences for the supplier or partner. Additionally, suppliers and partners should follow all applicable privacy, data protection and information security laws and regulations.

3. Business continuity and resilience

Suppliers must have arrangements in place for the ongoing delivery of services to 10x, specifically, resilient solutions supported by business continuity and/or disaster recovery plans to enable continuation of agreed service levels.

4. Labour and human rights

Suppliers and partners must uphold the human rights of their employees, including the right to freedom of association, non-discrimination, and the prohibition of forced labour and child labour. Suppliers and partners must provide a safe and healthy working environment, fair wages, and reasonable working hours in compliance with applicable laws and regulations, including the Modern Slavery Act 2015 or equivalent, and not engage in any activities that would constitute an offence under such applicable laws and regulations.

Suppliers and partners must undertake appropriate due diligence as part of its ongoing supplier management processes to ensure that their subcontractors and suppliers comply with these standards. Suppliers, partners and their respective subcontractors and suppliers must not have

been convicted of any offence involving modern slavery, or been the subject of any investigation, inquiry or proceeding by any governmental or regulatory authority regarding any offence or alleged offence of, or in connection with, modern slavery.

a) Freedom of association and collective bargaining:

Suppliers and partners must respect the right of their employees to freedom of association and collective bargaining, following applicable laws and regulations. Suppliers and partners must not interfere with the exercise of these rights or discriminate against employees who choose to exercise these rights.

b) Non-discrimination:

Suppliers and partners will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, or disability.

c) Forced labour:

Suppliers and partners must not use any form of forced or compulsory labour, including bonded labour, prison labour, modern slavery or human trafficking. Suppliers and partners must also ensure that their subcontractors and suppliers do not engage in these practices.

d) Child labour:

Suppliers and partners will not use child labour. The term “child” refers to any person employed under the age of 15 (or 14 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. We support the use of legitimate workplace apprenticeship programs which follow all applicable laws and regulations.

e) Health and safety:

Suppliers and partners must provide a safe and healthy working environment for their employees, in compliance with applicable laws and regulations. This includes providing appropriate training, equipment, and protective gear, as well as addressing potential hazards and preventing accidents and injuries.

f) Wages and benefits:

Suppliers and partners will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.

g) Working hours:

Suppliers and partners will not exceed local work hours and will appropriately compensate overtime. Suppliers and partners will not require employees to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent. In countries where the maximum work week is less, that standard shall apply. Suppliers' and partners' employees should be allowed at least one day off per seven-day week.

h) Respect and dignity:

Suppliers and partners will treat all their employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment.

5. Diversity, equality and inclusion

10x is committed to fostering a more equal, diverse and inclusive work culture. A culture where every one of our colleagues can bring their authentic self to work and feel empowered to reach their full potential.

To us at 10x:

- **Equality** means making sure that everyone is treated fairly and equally, we value our people's differences, understanding that they make us a stronger and more effective organisation.
- **Diversity** means understanding, recognising, accepting and valuing differences between people, including education, experience, knowledge, skillset, culture and personality. We celebrate diversity in thought.
- **Inclusion** means welcoming, embracing, and respecting the diversity of the 10x workforce and workplace. We aim to create a positive, supportive and respectful working environment that encourages all employees to engage and take part.

We expect our suppliers and partners to demonstrate their commitment to diversity, equality and inclusion, consistent with the above principles by:

- a) complying with all applicable laws and regulations related to equality.
- b) ensuring policies and approaches are in place to support understanding of the importance of diversity, equality and inclusion.
- c) working to create an inclusive working environment.
- d) supporting the communities in which they operate and contributing to their social and economic development; and
- e) respecting the culture and traditions of the communities in which they operate.

6. Environmental sustainability

Suppliers and partners must operate in an environmentally responsible manner, including complying with all relevant environmental laws and regulations. They should strive to reduce their environmental impact, conserve natural resources, and minimise waste and emissions. Suppliers and partners should also work to reduce the environmental impact of their products and services throughout their lifecycle.

a) Environmental management:

Suppliers and partners must develop and implement an environmental management system (EMS) to manage their environmental impact. The EMS should include policies, procedures, and controls to ensure compliance with environmental laws and regulations, as well as measures to minimize the environmental impact of their operations.

b) Waste and emissions:

Suppliers and partners must take steps to minimise waste and emissions, and to reduce the environmental impact of their products and services throughout their lifecycle. This includes implementing recycling programs, reducing energy use, and using sustainable materials.

c) Hazardous substances:

Suppliers and partners must ensure that any hazardous substances used in their operations are handled and disposed of safely and in compliance with applicable laws and regulations.

7. Business ethics

Suppliers and partners must conduct their business with integrity, honesty, and transparency. They must refrain from any activities that could compromise their ethical standards, or those of our company. This includes:

a) Anti-corruption:

Suppliers and partners must not engage in any form of corruption, bribery, or illegal payments to gain an unfair advantage in their business activities. Suppliers and partners must comply with all applicable anti-corruption laws and regulations.

b) Fraud and money laundering:

Suppliers and partners must comply with all applicable international standards and laws on fraud and money laundering.

c) Conflicts of interest:

Suppliers and partners must avoid any conflicts of interest that could compromise their ability to act in the best interests of our company.

Suppliers and partners must share any potential conflicts of interest and take steps to address them.

d) Confidentiality and intellectual property:

Suppliers and partners must maintain the confidentiality of intellectual property belonging to 10x and/or 10x's clients. Suppliers and partners must also respect the intellectual property rights of others.

e) Suppliers' suppliers and agents:

Suppliers are responsible for ensuring that relevant suppliers and agents engaged in the production of goods and services for 10x (if permitted) follow these principles. Suppliers agree that this includes all the supplier's direct suppliers and agents and any respective suppliers and agents that they use in connection with production of goods and services for 10x.

f) Payment terms:

We adhere to the Prompt Payment Code and have standard payment terms of 30 days (from receipt of an undisputed invoice). We expect our suppliers and partners to also have prompt payment standards with their own suppliers and subcontractors.

g) Gifts and hospitality:

Any gifts or hospitality given or received must be reasonable and appropriate with consideration of local culture and custom. Gifts and hospitality should follow the clear criteria detailed within 10x's Anti-Bribery and Corruption Policy. The intention behind the gift should always be considered.

All gifts and hospitality received over certain values will be registered, and dependent on value, approved in advance of receipt. 10x expects that no personnel, at any point, involved in a contract tender, renewal or negotiation would be offered, or accept, any gifts or hospitality.

8. Monitoring, reporting and record keeping.

10x reserves the right to monitor and audit suppliers' compliance with this code of conduct, either through its own monitoring activities or using third-party auditors. Suppliers must cooperate with any monitoring activities and provide access to their facilities and records as necessary. Suppliers must also promptly report to the applicable regulatory body any suspected or actual violations of this code of conduct.

Additionally, suppliers need to implement internal policies consistent with the terms of this code of conduct and provide us with access to that documentation upon our request, provided that the request will not put suppliers in breach of any law or regulation. This includes but is not limited to laws related to data protection and the protection of personal data.

9. Enforcement and remediation

Suppliers and partners must develop and maintain processes and policies to identify labour and human rights, health and safety, environmental, business ethics and legal compliance risks associated with its activities and implement procedures to control the identified risks.

10x may take appropriate enforcement action in the event of any violation of this code of conduct, including termination of the supplier relationship. Suppliers and partners are responsible for addressing any identified violations and implementing corrective actions to prevent future violations.

10. Whistleblowing

We expect our suppliers and partners to encourage their employees to raise concerns (whistleblowing) to 10x about inappropriate conduct by 10x or its employees and to make them aware of how to do this.

Suppliers, partners and their respective subcontractors and suppliers can raise any concerns in confidence or anonymously (where permitted) by emailing Suppliermanagement@10xbanking.com

11. Conclusion

10x values our relationship with our suppliers and partners, and we expect suppliers and partners to share our commitment to ethical and responsible business practices. This code of conduct serves as a guide for our expectations of supplier and partner conduct. We expect suppliers and partners to comply with all applicable laws and regulations, and to uphold the principles outlined in this code of conduct.

10x

Making Banking 10x Better