



EVORA Global

Supplier Code of Conduct

Date – May 2023



Introduction

EVORA Global Limited and its subsidiaries (collectively known as EVORA) are deeply committed to combatting the negative effects of climate change. Our team of passionate and highly skilled professionals share a common set of sustainability values, which drive our efforts to positively impact the environmental, social and governance (ESG) spheres.

Our primary focus is on addressing nature loss and promoting sustainable practices in all that we do. Through collaborative efforts and unwavering dedication, we strive to make a meaningful difference in these areas and contribute to a better built environment for all.

EVORA (sometimes referred to as “we” or “us” in this document) is dedicated to upholding the United Nations Global Compact (UNGC) Principles. To ensure that our commitment is shared by all our partners, we require our suppliers to comply with this Supplier Code of Conduct, which is based on the UNGC Principles. By enforcing these requirements, we aim to promote ethical business practices and drive positive change across our supply chain.

At EVORA, we hold ourselves and our suppliers to the highest standards of corporate integrity, responsible sourcing, and worker safety and wellbeing. Our commitment to these values is reflected in our Supplier Code of Conduct, which sets out the minimum standards that all entities supplying products and/or services to EVORA must meet.

By upholding these principles we seek to build a more sustainable future, not only for ourselves and our partners, but for all those who are impacted by our business activities.

Thank you,

Signed by:

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Carl Allen, CEO, EVORA Global Limited
April 2025

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1. Introduction and scope of this Code

All work performed for EVORA by a Supplier must be in full compliance with this Code. In addition, each Supplier shall ensure that its suppliers, consultants, contractors and workers comply with the requirements of this Code and the standards upon which it is based.

Coverage of All Workers. This Code of Conduct covers all types of workers that a Supplier may have, including temporary, migrant, student and contract, directly and indirectly employed workers and any other type of worker/employee unless a narrower group is specified.

Other Obligations. In addition to the requirements set out in this Code, Suppliers shall comply with (i) all applicable laws, regulations, directives and guidelines, as well all applicable industry standards and rules; and (ii) all obligations in any contract that a Supplier has with us. Where there is any conflict between the requirements of this Code and what applies under such laws, regulations, directives, guidelines or contractual obligations, the requirement which places the strictest obligation on the Supplier shall take precedence.

Cooperation. Suppliers shall cooperate with any information requests or audits that we may initiate to confirm their adherence to the requirements of this Code. Though we seek to work with Suppliers to improve conditions, we

may terminate our relationship (including any contracts) with any Supplier that fails to meet any requirement of this Code. All potential suppliers to EVORA will be subject to due diligence to ensure that our required standards are met.

Worker Feedback and Grievances. To support the identification and mitigation of risks related to this Code, we expect all Suppliers to have ongoing processes, including an effective grievance mechanism, to assess workers' understanding of, and obtain feedback on or violations against, practices and conditions covered by this Code and to foster continuous improvement. Suppliers must give workers a safe environment to provide grievance and feedback without fear of reprisal or retaliation, and, unless prohibited by law, maintain programmes that ensure the confidentiality, anonymity, and protection of supplier and worker whistleblowers.

2. UNGC Principles

We expect all Suppliers to respect the UNGC Principles, which require all businesses to:

Human Rights

- Principle 1: Support and respect the protection of internationally proclaimed human rights;
- Principle 2: Make sure that they are not complicit in human rights abuses;

Labour

- Principle 3: Uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: Uphold the elimination of all forms of forced and compulsory labour;
- Principle 5: Uphold the effective abolition of child labour;
- Principle 6: Uphold the elimination of discrimination in respect of employment and occupation;

Environment

- Principle 7: Support a precautionary approach to environmental challenges;
- Principle 8: Undertake initiatives to promote greater environmental responsibility;
- Principle 9: Encourage the development and diffusion of environmentally friendly technologies; and

Anti-Corruption

- Principle 10: Work against corruption in all its forms, including extortion and bribery.

2.1 Principle 1: Support and respect the protection of internationally proclaimed human rights

We expect all Suppliers to respect and support human rights. Respecting human rights means a Supplier should use due diligence to avoid infringing human rights and should address adverse human rights impacts with which they

are involved. Special attention should be paid to the rights of vulnerable groups, including women, children, people with disabilities, indigenous peoples, migrant workers and older persons. In addition, beyond respecting human rights, Suppliers are encouraged to take action to support human rights. This means taking voluntary action to make a positive contribution towards the protection and fulfilment of human rights whether through core business, strategic social investment/philanthropy, public policy engagement/advocacy and/or partnerships. Action to support human rights should be a complement to and not a substitute for action to respect human rights.

In the workplace, respecting human rights shall involve, at a minimum:

- (a) Providing a safe and hygienic working environment (including implementing relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries) and ensuring that accommodation, where provided, is clean, safe and meets the basic needs of workers;
- (b) Paying wages and benefits that meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher, without any unauthorised deductions;
- (c) Ensuring that working hours are not excessive. Specifically, workers should

not be expected to work (including overtime) in excess of those hours set out in relevant working time legislation or other national legal limits, unless they have selected to opt-out with appropriate supporting written evidence;

- (d) Ensuring that work performed is, to every extent possible, on the basis of recognised employment relationships established through national law and practice; and
- (e) Prohibiting physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.

2.2 Principle 2: Not be complicit in human rights abuses

We expect all Suppliers to avoid being complicit in human rights abuses. Complicity means being implicated in a human rights abuse that another company or a government, individual or group is causing (rather than through a Supplier's own direct business activities). The risk of an allegation of complicity is reduced (though not eliminated) if a Supplier has a systematic management approach to human rights, including due diligence processes that cover the Supplier's business relationships. Such processes should identify and prevent or mitigate the human rights risks with which the Supplier may be involved through links to its products, operations or services.

2.3 Principle 3: Uphold the freedom of association and the effective recognition of the right to collective bargaining

We expect all Suppliers to respect, and not interfere with, the right of their workers to join or form trade unions of their own choosing and to bargain collectively. We expect Suppliers to adopt an open attitude towards the activities of trade unions and their organisational activities, and not to discriminate against workers' representatives who should have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, we expect Suppliers to facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

2.4 Principle 4: Uphold the elimination of all forms of forced and compulsory labour

We expect all Suppliers to ensure that there is no forced, bonded or involuntary labour in their supply chains. Suppliers should not require workers to lodge "deposits" or their identity papers with their employer and workers should be free to leave their employer after reasonable notice. Suppliers must comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force from time to time in any part of its supply chain.

Suppliers are required to immediately report to EVORA any incidents of child labour, forced labour, slavery or human trafficking found in their business or supply chain.

2.5 Principle 5: Uphold the effective abolition of child labour

We expect all Suppliers to avoid any new recruitment of child labour. Where any child is found to be performing child labour, Suppliers shall develop or participate in and contribute to policies and programmes which provide for the transition of such child to enable her or him to attend or remain in quality education until no longer a child. Suppliers shall not employ children and young persons under 18 at night or in hazardous conditions.

For the purposes of this Code, “child labour”, “child” and “young persons” shall have the definitions below:

- (a) “Child Labour” means work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of any child;
- (b) “Child” means every human being below the age of 18 years unless, under the law applicable to the child, majority is attained earlier. In Spanish-speaking countries in Latin America, it is usual practice to distinguish between boys and girls, on the one hand, and adolescents, on the other, thereby recognising that

adolescents (aged 10 to 17, inclusive) are more mature and can take on more responsibilities than younger children (aged below 10);

- (c) “Young Person” means any worker over the age of a child as defined above and under the age of 18.

2.6 Principle 6: Uphold the elimination of discrimination in respect of employment and occupation

We expect all Suppliers to be committed to a workplace free of harassment and discrimination. Companies shall not engage in discrimination, harassment or any other abuse based on age, disability, gender or gender reassignment, marital or civil partnership status, pregnancy or maternity, race, colour, ethnicity or national origin, religion or belief, gender, gender identity, sexual orientation, caste, political affiliation or union membership in hiring and employment practices such as compensation, promotions, access to training, termination or retirement.

2.7 Principle 7: Support a precautionary approach to environmental challenges

We expect all Suppliers to take a systematic approach to preventing environmental damage through appropriate risk assessment, risk management and risk communication. As part of this systematic approach, Suppliers should have an environmental policy which covers the

following topics, to the extent material: (i) pollution prevention and resource reduction; (ii) management of hazardous substances; (iii) management of solid waste (non-hazardous); (iv) control of air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances and combustion by-products; (v) management of water use and wastewater; (vi) management of energy consumption; and (vii) reduction of greenhouse gas emissions and goal-setting. Suppliers should strive for continuous improvement by continually assessing their environmental impacts, including in their supply chains.

In addition, we expect Suppliers to obtain and keep current all required environmental permits, approvals and registrations, and follow all corresponding operational and reporting requirements. Suppliers must also adhere to all applicable laws, regulations and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

2.8 Principles 8 and 9: Undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies

In addition to preventing environmental damage as a part of risk management in accordance with

Principle 7, we encourage Suppliers to take active steps to promote environmental responsibility within their business models and supply chains, including encouraging the development and use of environmentally friendly technologies. This could involve:

- (a) Establishing a sustainable production and consumption programme with performance objectives that take the organisation beyond compliance in the long-term, for example through refocusing research and development towards “design for sustainability”;
- (b) Measuring, tracking and communicating progress on incorporating sustainability principles into business practices; or
- (c) Co-operating with industry partners and participating in sectoral initiatives to ensure that environmentally “best available technology” is available to other organisations.

To achieve the above, Suppliers could consider appropriate use of assessment tools (such as environmental impact assessments and lifecycle assessments), management tools (such as an environmental management system) and communication and reporting tools (such as carbon footprint reporting and other sustainability reporting).

2.9 Principle 10: Work against corruption in all its form, including extortion and bribery

Suppliers must comply with all applicable laws, statutes, codes and regulations relating to the prevention of bribery and corruption. To that end, Suppliers must not accept, offer, promise, pay, permit or authorise:

- (a) bribes, facilitation payments, kickbacks or illegal political contributions;
- (b) money, goods, services, entertainment, employment, contracts or other things of value, in order to obtain or retain improper advantage; or
- (c) any other unlawful or improper payments or benefits.

We expect all Suppliers to have a zero-tolerance policy to bribery, extortion and other forms of corruption in their own direct business activities and their supply chains, and to have concrete policies and programmes in place to support this. In particular, we expect Suppliers to have monitoring, record-keeping and enforcement procedures in place to ensure their compliance with all applicable anti-corruption laws.

3. Other requirements

3.1 Personal information and privacy

Suppliers must comply with applicable privacy, data protection and information security laws and regulatory requirements when handling personal

information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers shall ensure that personal data handled on behalf of EVORA or its clients is processed by implementing appropriate technical and organisational measures to protect such personal data. This includes protecting personal data from accidental or unlawful destruction, loss or alteration, unauthorised disclosure or access (where the processing involves transmission of data over a network) and against all other unlawful forms of processing. Suppliers are required to immediately report to EVORA any incidents or breach of these requirements.

3.2 Information security

Suppliers must have in place policies and control frameworks to ensure the integrity and security of their information systems and the ongoing protection of the information they hold, through appropriate cyber and information security controls. Suppliers operating in the UK are encouraged to obtain the Cyber Essentials Certification.

Suppliers must inform EVORA as soon as possible, and in any case within 72 hours, if they become aware of any cybersecurity incident that affects or has the potential to affect EVORA or its clients' data.

3.3 Diversity, equity and inclusion

We believe that the performance of our Suppliers has a direct impact on the quality of our services. We also believe that diverse, equitable and inclusive cultures foster high performing teams. People with different life experiences can engender new thinking and inspire alternative approaches to problem-solving and decision-making. We are therefore committed to advancing diversity, equity and inclusion in our supply chain. We also search for Suppliers that similarly value diversity in their own supply chain. At a minimum, we expect our Suppliers to have a diversity, equity and inclusion policy or similar relating to their own workforce. We also encourage Suppliers to: (i) use search and assessment processes that are both unbiased and transparent, (ii) ensure that Suppliers' procurement teams proactively provide diverse businesses with fair access to bids, and (iii) where practicable, actively seek out and provide opportunities for diverse suppliers to participate in business opportunities.

Suppliers are expected to demonstrate their commitment to diversity, equity and inclusion by:

- (a) complying with all applicable equality legislation;
- (b) ensuring policies and approaches are in place to support understanding of the importance of diversity, equity and inclusion, including the prevention of discrimination, harassment and bullying based on any diversity characteristic;
- (c) working actively towards having a diverse mix of people at all levels in their organisation, recognising the importance of the socio-economic background of their workers as well as diversity characteristics;
- (d) considering the impact of their policies and practices on different groups in the wider population, and where they can take positive action; and
- (e) being committed to creating an inclusive working environment in which each worker can fulfil their potential and maximise their contribution.

Confirmation by Supplier

I, on behalf of [*Supplier name*], agree to the terms and conditions set out in this Code.

Signed:

Name:

Date:

Title:

CONTACT US:

w: [evoraglobal.com](https://www.evoraglobal.com)

e: info@evoraglobal.com



@evoraglobal



[linkedin.com/company/evora-global](https://www.linkedin.com/company/evora-global)



@evoraglobal

