

## **RESPONSIBLE SUPPLIER CODE OF CONDUCT**

### **Introduction**

As part of our ESG and diversity and inclusion policies, we aim to work with suppliers who operate in a fair and ethical manner, uphold human rights and treat their workers with dignity and respect.

Our Supplier Code of Conduct (the “Code of Conduct”) applies to all suppliers and their subsidiaries and subcontractors that provide goods or services to us. This Code of Conduct sets out the basic ethical requirements we expect our suppliers to adhere to across all jurisdictions.

Suppliers contracting with us are expected to promote the principles of this Code of Conduct in their own supply chains and by supplying goods or services to us you confirm that you are complying with the provisions listed in this Code of Conduct.

### **Adherence to the Code of Conduct**

We expect our suppliers to be transparent in their practices and actively promote adherence to the principles espoused in this Code of Conduct.

We reserve the right to refuse to enter into relationships with suppliers that do not achieve or are unable to demonstrate progress towards this Code of Conduct and that adopt approaches which are inconsistent with our own principles.

### **Evidencing Compliance**

Suppliers must be able to demonstrate adherence to the Code of Conduct upon request and we reserve the right to undertake audits based on the principles set out in this Code of Conduct.

### **Code of Conduct**

We expect our suppliers to:

1. Demonstrate a commitment to equality of opportunity for individuals and groups enabling them to work in an environment free from discrimination, sexual harassment and oppression;
2. Never abuse or intimidate, directly or indirectly, any member of staff;
3. Have proper disciplinary, grievance and appeal procedures in place for the protection of staff;
4. Not use any form of forced, bonded or involuntary labour. Workers must not be obliged to lodge identity papers or pay any deposit as a condition of work;
5. Ensure their relationships with their employees comply with international conventions. Suppliers should not seek to avoid providing employees with their legal or contractual rights;
6. Ensure staff working hours, wages and benefits are compliant with applicable international conventions;

7. Ensure child labour is not utilised in their operations and only employ workers who meet or exceed the applicable minimum legal working age in the country in question;
8. Implement initiatives which will reduce adverse environmental impacts, including greenhouse gas emissions, resulting from their products and/or services;
9. Take appropriate measures to ensure the health and safety of their workforce and the wider public; and
10. Ensure they do not engage in bribery, corruption or other similar unethical practices. In particular, suppliers must comply with all applicable laws, statutes, regulations, and codes relating to anti-bribery and anti-corruption including but not limited to the Bribery Act 2010 (the “Relevant Requirements”), not engage in any activity, practice or conduct which would constitute an offence under sections 1, 2 or 6 of the Bribery Act 2010 if such activity, practice or conduct had been carried out in the UK; maintain policies and procedures, including but not limited to adequate procedures under the Bribery Act 2010, to ensure compliance with the Relevant Requirements, and enforce them where appropriate; and promptly report to us any request or demand for any undue financial or other advantage of any kind received by the supplier in connection with the performance of any agreement between us.

If you have any questions regarding this Code of Conduct please contact the Legal and Compliance Department at BH-DG Systematic Trading LLP at [Legal@bhdgsystematic.com](mailto:Legal@bhdgsystematic.com).