

Supplier Code of Conduct**for****All Suppliers of the****Infront Group of****Companies****Effective from: July 2024**

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1. Introduction

Infront is one of Europe's leading providers of market data and software, and thousands of customers rely on us to provide them with responsive tools powered by rich, reliable data. We have a strong reputation in the financial markets and our customers and shareholders expect Infront to conduct our business operations with responsibility, integrity, and accountability.

To maintain our reputation, we depend on various stakeholders, including our employees, customers, suppliers, and financial intermediaries. Our employees are expected to embody our corporate values of Engagement, Communication and Recognition, while adhering to our Code of Conduct. We value transparency and trust in all communications. Clarity and openness are central to all our interactions, with every piece of feedback welcomed.

Similarly, we prioritise building robust relationships with our suppliers, relying on them to support our company and ensure the successful delivery of products and services to our customers. Our Supplier Code of Conduct outlines our expectations regarding integrity, information protection, labour and human rights, health and safety, and environmental protection.

This code surpasses mere compliance with applicable laws by drawing upon internationally recognised standards to promote social and environmental responsibility. Infront requires its suppliers to operate in accordance with the principles outlined in this Supplier Code of Conduct.

2. Purpose and Scope

At Infront, we are dedicated to upholding the highest ethical standards and values in all aspects of our operations. This Supplier Code of Conduct (SCoC) serves to communicate our expectations to our suppliers and partners, emphasising our commitment to integrity, sustainability, and responsible business practices.

This Supplier Code applies to all Infront suppliers of products or services, including consulting firms, independent contractors, staffing agencies, agency temps, licensees, regardless of their title or the product or services they provide ("Suppliers").

Infront's SCoC is based on a risk evaluation of required suppliers and Infront's purchasing systems and processes.

3. Business Integrity

3.1 Anti-Bribery and Corruption

Infront opposes bribery and corruption in all forms – direct and indirect, in the public sector and the private sector. Our Anti-Bribery and Corruption Policy provides practical guidance and instructions on how to best deal with situations that may constitute a bribery and corruption risk.

Infront's Suppliers are prohibited from taking any action on behalf of Infront which could be seen as an attempt to bribe, accept a bribe, or engage in any other corrupt activities. In addition, we expect our Suppliers to fully comply with all applicable anti-bribery and corruption and anti-money laundering legislation in the countries of our operations.

3.2 Anti-money laundering

Money laundering is the illegal process of making funds generated by criminal activity appear to have come from a legitimate source. Infront's Anti-Bribery and Corruption Policy prohibits the company from being involved in money laundering. All our suppliers are obliged to comply with our standards and applicable laws at all times. Anti-bribery and corruption and anti-money laundering clauses will be included in our contracts with suppliers to ensure compliance, and we expect our Suppliers to be able to demonstrate compliance with applicable laws/regulations if requested.

3.3 Fair competition and anti-trust

Infront is dedicated to fostering open competition and equitable dealings with our customers, suppliers, and competitors. We expect our suppliers to operate in complete accordance with all relevant competition laws, refraining from any form of anti-competitive behaviour, whether on behalf of Infront or otherwise.

3.4 Tax evasion

Infront has a zero-tolerance approach to all forms of illegal tax evasion. We expect all our suppliers to comply fully with tax laws and regulations in all jurisdictions where they operate. Suppliers must accurately report and pay all taxes owed, without engaging in any fraudulent activities aimed at evading tax obligations.

3.5 Intellectual property

Suppliers are required to uphold the intellectual property rights of Infront and handle the transfer of technology and know-how in a manner that safeguards these rights. Under no circumstances should any confidential information belonging to Infront be disclosed to third parties without obtaining prior written consent from us.

3.6 Data privacy and cyber risk

Infront is dedicated to safeguarding the personal data it collects or maintains concerning customers, employees, and other parties. We expect all our Suppliers to consistently adhere to relevant data protection laws and regulations. Personal data gathered and processed by our Suppliers while rendering services to Infront must adhere to the following guidelines:

- Collection and processing must be fair, lawful, and transparent.
- Data should be used only for specific, legitimate purposes.
- Only the minimum necessary data required for the task should be accessed.
- Information must be accurate and kept up to date.
- Data should only be retained for as long as necessary.
- The rights of individuals regarding their data should be respected.
- Measures should be in place to ensure the security of data.
- Data should not be transferred to other countries without adequate protection as per applicable laws.

Any personal data of Infront processed by Suppliers as data processors, as defined by relevant regulations like the EU General Data Protection Regulation (GDPR), must be processed solely in accordance with Infront's instructions.

4. Workforce and Human Rights

4.1 Modern Slavery

Modern slavery and human trafficking in its various forms is a crime and a violation of fundamental human rights. Infront has a zero-tolerance approach to all forms of modern slavery including slavery, servitude, forced labour, and human trafficking. These practices deprive individuals of their freedom and exploit them for personal or commercial gain. We hold our Suppliers to the highest ethical standards and expect them to act with integrity in all business dealings and relationships. It is imperative that our Suppliers implement robust controls to prevent modern slavery within their businesses and supply chains. Together, we are committed

to eradicating this practice and ensuring that all individuals are treated with dignity and respect.

4.2 Child Labour

At Infront, we oppose the exploitation of children through child labour, and we expect our Suppliers to share our commitment to protecting children's rights and to adhere to all laws and regulations prohibiting child labour. Our Suppliers must ensure that no child under the legal working age is employed, and they should implement measures to verify the age of their workers and prevent any form of child labour within their operations and supply chains.

4.3 Working hours

At Infront, we prioritise the well-being and rights of workers within our supply chain, including their working hours and conditions. We expect our Suppliers to ensure that all workers, including employees and subcontractors, adhere to normal working hours as per industry standards and relevant laws and regulations in their respective countries of operation. This includes provisions for meal breaks, rest periods, and overtime, which should be managed in accordance with legal requirements and industry best practices. We advocate against excessive working hours and encourage our Suppliers to implement measures to prevent routine overtime work. We emphasise the importance of providing workers with adequate rest days and compensatory leave to maintain their well-being and work-life balance, aligning with industry standards and applicable regulations.

4.4 Working conditions

At Infront, we are committed to ensuring safe and healthy working conditions for all individuals involved in our supply chain. Our Suppliers are expected to provide workplaces that adhere to applicable health and safety regulations and industry standards. This includes maintaining facilities that are free from hazards and risks to workers' health and safety. Suppliers should implement measures to prevent accidents, injuries, and occupational illnesses, such as providing necessary protective equipment and conducting regular safety training sessions. Additionally, we expect Suppliers to comply with regulations regarding working conditions, such as ventilation, lighting, and ergonomics, to promote a comfortable and productive work environment.

4.5 Wages and benefits

Infront is committed to ensuring fair and equitable wages and benefits for all workers in our supply chain. Our Suppliers are expected to comply with applicable laws and regulations regarding wages, including minimum wage requirements and timely payment of wages. Additionally, we encourage Suppliers to provide competitive compensation packages that reflect the skills, experience, and contributions of their workers. Infront prohibits any form of wage theft, including unauthorised deductions or withholding of wages, and expects Suppliers to maintain transparent and accurate records of all payments made to workers. We believe that fair compensation is essential for worker motivation and community well-being.

4.6 Non-discrimination

Infront upholds a strict policy against discrimination in any form. We value diversity and inclusion, treating all individuals with respect and dignity regardless of race, ethnicity, gender, sexual orientation, religion, age, disability, or any other characteristic protected by law. Our suppliers must share this commitment, fostering an environment free from discrimination in hiring, promotion, compensation, and all other aspects of employment. Discriminatory practices are not tolerated, as we believe in equal opportunities for all.

4.7 Fair treatment

We expect our suppliers to provide fair and equitable treatment to all individuals, including employees, subcontractors, and stakeholders. This entails fostering an environment where everyone is respected, valued, and provided with equal opportunities for growth and advancement. Discrimination, harassment, or any form of unfair treatment is strictly prohibited. We believe in promoting a culture of inclusivity, where all individuals are treated with dignity and integrity, fostering a positive and supportive work environment for everyone involved.

4.8 Freedom of association and collective bargaining

At Infront, we extend our commitment to respecting the rights of workers to our suppliers as well. We expect our suppliers to respect the right of their employees to join or form trade unions or worker associations of their choice, without fear of retaliation or discrimination. Additionally, we support the negotiation of collective agreements between employers and labour representatives to establish fair terms and conditions of employment. It is imperative that our suppliers recognise and respect these rights, ensuring that their employees are free to organise and bargain collectively without interference or intimidation.

5. Environment

At Infront we are committed to delivering on the Net-Zero Coalition as set forth in the Paris Agreement. We actively measure and monitor greenhouse gas (GHG) emissions and have set targets to reduce GHG emissions in line with the Paris Agreement. Our hope is that our Suppliers would do the same and strive to continually improve their environmental footprint.

5.1 Emissions

Suppliers are encouraged to work to minimise emissions from their operations, including greenhouse gases and other pollutants.

5.2 Hazardous Substances

Suppliers are encouraged to manage hazardous substances responsibly, ensuring proper handling, storage, and disposal to prevent harm to the environment and human health. They should comply with relevant regulations and strive to minimise the use of hazardous materials whenever possible.

5.3 Water Management

Where possible, Suppliers are encouraged to implement effective water management practices to conserve water resources and prevent pollution of water bodies.

5.4 Waste Management

Suppliers are encouraged to minimise waste generation and manage waste streams in an environmentally responsible manner.

5.5 Data and Performance Management

Suppliers are encouraged to track environmental performance metrics and monitor progress towards environmental goals. Regular reporting and transparency on environmental performance are encouraged for continuous improvement and accountability.

6. Compliance with Infront's Supplier Code of Conduct

The expectations outlined in the Code complement any legal, regulatory, or contractual requirements that Suppliers must adhere to. If any such requirements are more restrictive than the Code, Suppliers are obliged to comply with the stricter legal requirement. To ensure compliance with this Code, Infront expects Suppliers to:

- Provide all relevant information regarding their compliance with this Code upon request, including self-assessment questionnaires, internal audit reports, or certifications, or by allowing Infront to conduct audits.
- Collaborate with Infront to enhance operations and processes to achieve the appropriate level of compliance with this Code.
- Notify Infront of any challenges encountered in applying this Code.

Failure by a Supplier to comply with the principles outlined in this Code may result in corrective actions being required by Infront. In cases of serious non-compliance, Infront reserves the right to reassess its relationship with the Supplier.

7. Raising Concerns

Infront prioritises the adherence to all relevant laws, regulations, and internal policies. We foster an environment of open communication and transparency. Various channels have been established for employees, suppliers, and others to report any conduct that contradicts our Supplier Code of Conduct, legal statutes, regulations, or company policies. In their dealings with Infront, suppliers are expected to:

- Voice any concerns if they suspect a breach of Infront's Supplier Code of Conduct.
- Report any knowledge or suspicion of breaches of laws, regulations, or company policies related to Infront to their designated Infront contact or through Infront's external whistleblowing portal. Reporting can also be done anonymously through the portal. The portal can be accessed via our website: <https://infrontfinance.integrityline.com/frontpage>

8. Periodic Review

Infront is dedicated to regularly reviewing and updating our Supplier Code of Conduct to stay abreast of changing regulations and industry standards. This ensures continued alignment with our values and objectives, fostering a culture of compliance and accountability among our suppliers.

9. Final Acceptance and Confirmation

By signing below, the supplier acknowledges that they have read and agree to comply with the terms outlined in this Supplier Code of Conduct:

Date

Authorised Signature

Job Title