

Kinly Supplier Code of Conduct

March 2024



Introduction

At Kinly, we know the importance of operating responsibly and sustainably. We aim to conduct our business in a caring and accountable manner, and engaging our supply chain is essential in doing this.

This Supplier Code of Conduct (the “**Code**”), represents the minimum standards our suppliers must meet in order to work with us. We expect our suppliers and their employees, personnel, agents, and subcontractors (collectively referred to as ‘**Suppliers**’) to read, understand, and apply this Code in their business processes. We also expect our suppliers to impose the same principles on their own supply chain.

The Code is based on the ten principles of the UN Global Compact and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.

Compliance and reporting concerns

Compliance with all applicable laws is the foundation on which Kinly's ethical standards are built. All suppliers must respect and comply with the applicable laws, rules, and regulations.

If any supplier has questions or concerns about the Code or how to manage a particular situation, they should reach out to their contact within Kinly or Kinly’s legal department.

Any concerns of breaches to the Code, misconduct, acts, or behaviour that is not in accordance with the Code should be reported to Kinly’s compliance committee (trust@kinly.com) or anonymously via the SpeakUp Communication tool: [SpeakUp Policy \(kinly.com\)](#).

Version Control			
Version number	Date	Author	Approved by:
Version 1	14-12-2023	Legal & HR	Compliance Committee
Version 2	29-04-2024	CSR	Compliance Committee

Labour and human rights

Working practices

Kinly is committed to protecting human rights and reducing negative social impacts from employment, including tackling modern slavery and human trafficking.

Kinly expects its suppliers to:

- Support and respect the protection of human rights and ensure they are not complicit in human rights abuses.
- Comply with all applicable child labour laws and employ only workers who meet the applicable minimum legal age requirement.
- Prohibit the use of forced and compulsory labour, prison labour, or any other form of modern slavery. Employment must always be voluntary.
- Prohibit the trafficking of persons.
- Set working hours, wages and overtime pay in compliance with all applicable laws, including abiding by any national minimum legal wage.
- Uphold the freedom of association and the effective recognition of the right to collective bargaining.
- Ensure that all third-party employment agencies it uses are compliant with the provisions of this Code and the law.

Diversity, Equity & Inclusion

We appreciate that all people are unique and are to be respected for their individual talents. We strive to attract a diverse workforce and create an inclusive work environment that allows everyone to contribute.

Kinly expects its suppliers to:

- Treat all employees with dignity and respect.
- Not discriminate against any employee based on race, religion, age, gender, national origin, citizenship status, marital status, sexual orientation, gender identity, disability, pregnancy, or other legally protected status.
- Have policies and procedures in place that prohibit and prevent any form of harassment, discrimination or other behaviour that may be perceived as threatening or degrading.

Health & Safety

Kinly strives to provide each employee, contractor, customer and visitor with a safe and healthy work environment. We follow best practice safety procedures and report accidents, injuries and unsafe equipment and conditions. Violence and threatening behaviour are not accepted at Kinly.

Kinly expects its suppliers to:

- Comply with all relevant legislation in relation to health and safety.
- Treat occupational health and safety of employees as a priority throughout all aspects of its activities.
- Make sure that their employees take reasonable care of their own health and safety. This includes following instructions, implementing control measures and safe systems of work, and using safety equipment and personal protective equipment as instructed and when applicable.
- Identify and report hazards, risks, accidents, or incidents that have or could have caused injury or damage. These reports should identify corrective action, along with opportunities for improvement, without fear of reprisal.
- Assist in the investigation of accidents or potential accidents to introduce measures that will prevent reoccurrence.

Environment

Kinly is committed to leading the industry in minimising the impact of our activities on the environment. We conduct our business in a way that supports environmental sustainability, and we set ourselves

challenging standards in areas such as energy consumption, waste management and reduction of harmful carbon emissions.

Kinly expects its suppliers to:

- Comply with all applicable environmental laws, regulations, and standards.
- Demonstrate a clear understanding of environmental risks and responsibilities, and have in place an effective management system to mitigate these risks.
- Encourage the development and distribution of products and technologies to minimise their environmental impact throughout their value chain.
- Set targets to reduce environmental impact and improve the environmental performance of their own supply chain.
- Actively promote waste reduction and increase reuse and recycling.
- Have in place plans to reduce emissions to air, ground and water, to limit pollution and prevent damage to biodiversity.

Governance

Anti-corruption & anti-bribery

Kinly seeks to outperform its competition fairly and honestly. We find competitive advantages through superior performance and never through unethical or illegal business practices.

Kinly expects its suppliers to:

- Not take unfair advantage of anyone through manipulation, extortion, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.
- Prevent bribery within its business and supply chain. This includes stopping any direct or indirect promise or offer, or pay anything of value to any Kinly employee or government official, to influence an act or decision to gain a business advantage.
- Comply with antitrust and fair competition law in all countries they operate.

Information Security

Kinly will process personal data in accordance with applicable data protection laws and only for limited, explicit, and legitimate purposes. We will not use personal data for any purpose that is incompatible with the purpose for which it was initially collected, unless we receive prior consent for further use. Kinly has an IT security framework in place that manages risks and reduces vulnerabilities.

Kinly expects its suppliers to:

- Have an IT security framework in place that is effective and appropriate taking into account its organisation and its activities.
- Process personal data in accordance with applicable data protection laws.
- Report any potential security incident that involves Kinly or Kinly's customer data as soon as possible.

Anti-money laundering & tax evasion

Kinly does not tolerate any business transaction or activity that would directly or indirectly support criminal acts or violate anti-money laundering or terrorism financing laws. Kinly has a zero-tolerance policy for corporate tax evasion and the facilitation of tax evasion.

Kinly expects its suppliers to:

- Comply with all relevant laws and regulations and to have adequate controls in place to prevent money laundering activities from occurring.
- Have procedures in place to mitigate and prevent tax evasion within its own organisation and its supply chain.