



ACT Ethical Guidelines

Version 1

Date: March 2024

Sustainable Market Solutions Holding B.V., and Affiliated Companies (hereafter 'ACT') is committed to acting in accordance with its core values and expects its suppliers to exhibit a commitment to similar standards. As a socially and environmentally responsible corporate entity, ACT recognizes the economic, ecological, and social impacts of our operations and activities. Our *Ethical Guidelines below* explain how we expect our 'Suppliers and Business Partners' to operate and work towards ethical business operations.

1. Legal compliance

As a responsible company, we expect our Suppliers and Business Partners to share our commitment to compliance with applicable laws and regulations:

- Know and adhere to the laws that apply to their business and operations
- Alert ACT regarding any breaches of applicable laws and/or regulations reasonably likely to adversely impact any transaction with ACT or Supplier's continuing ability to do business, or cause ACT reputational harm

2. Conduct business with integrity

We seek business relationships based on trust, transparency, and mutual accountability. We expect our Suppliers and Business Partners to:

- Compete equitably and ethically for ACT's business
- Refrain from offering, promising, or accepting bribes or facilitation payments (in any manner related to any transaction with ACT)
- Avoid any conflict of interest that pertains to financial stakes or other arrangements with our employees and disclose to ACT any knowledge of such conflicts of interest
- Collaborate with their own suppliers to promote ethical business behavior that aligns with these Ethical Guidelines

3. Environmental practices

Our Suppliers and Business Partners are expected to operate their business in an environmentally sustainable way. We expect our Suppliers and Business Partners to:

- Monitor, track, and document their total Scope 1, 2, and 3 emissions, and work towards reducing their carbon footprint across their supply chain
- Identify, manage, reduce, and responsibly dispose of or recycle solid waste

- Take appropriate steps to ensure that biodiversity is preserved throughout their operations, with no deforestation in protected areas
- Take appropriate steps to minimize water consumption at their sites and/or along their supply chains

4. Treat people with dignity and respect

We expect our Suppliers and Business Partners to respect and support the protection of human rights of their workers and others affected by their activities:

- Promote an inclusive work environment that is free of harassment and discrimination
- Neither engage in nor permit human trafficking, forced labor, or child labor as delineated by the International Labour Organization (ILO)
- Respect workers' rights to organize and bargain collectively
- Meet or exceed all applicable legal requirements for compensation and working conditions

5. Health & safety practices

Our Suppliers and Business Partners are expected to provide a safe and healthy workplace. We expect our Suppliers and Business Partners to:

- Identify, assess, and control workplace hazards (e.g., chemical, electrical, and other energy sources, fire, vehicles, and fall hazards)
- Implement emergency plans and response procedures to be prepared for emergency situations
- Prevent, track, manage, and report occupational injury and illnesses across their operations
- Alert ACT regarding any material health and safety issues with the goods and services they supply

6. Keep accurate and honest records

Our Suppliers and Business Partners are expected to maintain accurate and honest records. This helps ACT to make responsible business decisions and disclose truthful and timely information to our stakeholders. We expect our Suppliers and Business Partners to:

- Maintain books and records that reflect all transactions in an accurate, transparent, and timely way according to locally applicable and accepted accounting standards
- Employ appropriate compliance processes for matters such as worker health and safety, and labor and employment

7. Protect ACT's information, assets, and interests

Our Suppliers and Business Partners are expected to responsibly handle and protect any proprietary information or property of ACT entrusted to them in connection with business dealings with ACT. We expect our Suppliers and Business Partners to:

- Safeguard any confidential information belonging to ACT that is shared in the course of engaging in business with ACT, which includes intellectual property, confidential business information, and financial data
- Safeguard any property belonging to ACT while under their control