

Service Provider Code of Conduct

Owning Department: Corporate Governance

Effective From:

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Service Provider Code of Conduct

Corporate Governance

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SIMBEC-ORION

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1 PURPOSE AND SCOPE

It is Simbec-Orion's policy to conduct all our business in an honest, transparent, and ethical manner. We communicate clearly, openly and with respect and are committed to running our business in a responsible and sustainable way. We seek to manage our environmental and social impacts, whilst aiming to create shared value for our clients, employees, service providers and shareholders. We are committed to ethical, sustainable, and socially responsible procurement and we expect the same standards from our Service Providers. We view our Service Providers as partners, and we care about the way they do business when providing goods or services.

This Code of Conduct policy describes our minimum expectations, and Service Providers to Simbec-Orion are required to review this code ensuring relevant areas of their business and supply chains meet these standards and continuously strives to improve the standard of its business practices.

This code applies to all Simbec-Orion's Service Providers (defined as any company supplying a product or service to Simbec-Orion) and their affiliates and applies to all products and services we purchase. We have a wide and diverse range of Service Providers and developed a comprehensive but flexible Service Provider Management Process incorporating Quality, Data Protection and Environmental, Social and Governance (ESG) assessments for managing risk in our supply chain. Temporary Workers such as Consultants and Contractors are out of scope of this Code of Conduct.

The purpose of this policy is to outline our expectations regarding Environmental, Social and Governance (ESG) of Service Providers and can form part of the contractual documentation issued during engagement. Simbec-Orion reserves the right to terminate an agreement with any Service Provider who does not comply with this Code.

2 CODE OF CONDUCT

2.1 TRANSPARENCY AND DELIVERY

Simbec-Orion conduct all our business in an honest and ethical manner, we communicate openly and are committed to ensuring our supply chain partners adhere to standards as set out in this Code of Conduct. Simbec-Orion expects Service Providers to demonstrate openness and honesty and to be realistic about capacity and capability at all times, accepting accountability and responsibility for performance along the full delivery chain.

We expect Service Providers to act ethically and within legislation and to where practical continuously improve their sustainability performance by implementing appropriate measures through the delivery chain and monitor their performance. We expect Service Providers to be aware of how they contribute to our overall delivery, and to work with us to ensure that their product or service is used effectively in the delivery of high-quality service. We expect Service Providers to behave in accordance with required standards and be transparent and forthcoming, work collaboratively with Simbec-Orion to deliver exceptional services throughout and in accordance with any contractual agreement. To establish trusting and open relationships,

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we can work with Service Providers to ensure the standards of this code are met and drive improved performance year on year.

We are committed to paying all valid invoices for delivery of products/services promptly. We require our Service Providers to pass this commitment down to subcontractors via standard terms and conditions and have mechanisms in place to monitor.

2.2 COMPLIANCE WITH LAWS AND REGULATIONS

The Service Provider shall adhere to all applicable laws and regulations in which they operate. This includes laws and legal environmental requirements in the countries of their operations and international laws (including those relating to international trade, data protection and anti-trust/competition laws). Furthermore, Simbec-Orion encourages its Service Providers to strive to comply with international and industry standards and best practices. The Service Provider is required to cooperate fully with any appropriately authorised internal or external investigation and should never withhold, tamper with, or fail to communicate relevant information in connection with an appropriately authorised investigation.

2.3 QUALITY SERVICE

Service Providers shall provide high-quality, safe, efficient, and effective products and services that are in full compliance with applicable laws and regulations and in line with contractual agreements with Simbec-Orion. Service Providers should have functional clear processes that work smoothly and in collaboration with Simbec-Orion and are under continuous review. Service Providers will provide assurances their workforce has the necessary training and capability to carry out and engage with Simbec-Orion and will meet generally recognised quality standards with demonstrable mechanisms in place to monitor quality and able to immediately address all critical issues that have the potential to negatively affect the quality of goods and services.

2.4 RISK MANAGEMENT

Service Providers are expected to implement processes and procedures to identify, determine and manage risk in all areas addressed by this Code of Conduct and with respect to all applicable legal and regulatory requirements as a minimum to ensure the highest standards are maintained.

We encourage our Service Providers to proactively identify and manage risks and communicate with us promptly in the event of any issues that could impact on delivery of our business. Risks should be managed by the party that is best placed to do so. Providers will comply with all applicable quality, health, safety, and environmental regulations. All required permits, licenses and registrations will be obtained, maintained, and kept up to date. Service Providers will fulfil their operational and reporting requirements, depending on our requirements, we may ask to evidence compliance either during onboarding or through regular qualification management activity.

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2.5 BRIBERY AND CORRUPTION

Corruption, extortion, and embezzlement, in any form, are strictly prohibited. Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. Service Providers must fully comply with requirements of all applicable bribery and anti-corruption laws in the country of operation. In no circumstance shall the Service Provider offer bribes or facilitation payments, or grant any advantage, whether directly or indirectly, or offer any gift or entertainment with the aim of influencing decisions, or to secure an improper advantage with or for Simbec-Orion. The Service Provider will ensure appropriate business conduct at all times and that anti-bribery and anti-corruption measures along with a clear route to raise any concerns are in place. In the event that formal Code of Conduct, Anti-Bribery Anti-Corruption and Whistleblowing policies are not yet in place, Simbec-Orion will work with the Service Provider to assess framework in place and any associated risks.

2.6 CONFLICTS OF INTEREST

It is Simbec-Orion's policy to conduct all our business in an honest and ethical manner. We communicate clearly, openly with respect and are committed to ensuring our supply chain partners adhere to the highest standards of ethics. In dealings with Simbec-Orion, the Service Provider shall avoid conflicts of interest. All and any, conflict of interest in any business dealings with Simbec-Orion, of which the Service Provider is aware, will be declared to Simbec-Orion to allow us the opportunity to take appropriate action. In particular, the Service Provider shall in no circumstance offer any payment or personal advantage to any Simbec-Orion employees or representatives in exchange for conducting business with Simbec-Orion.

The Service Provider is encouraged to report to the Simbec-Orion appropriately appointed officer any request or attempt by Simbec-Orion employees to gain a personal advantage. Service Providers are required to act ethically and within regulations and legislation by implementing appropriate measures.

2.7 ANTI COMPETITIVE PRACTICES

The Service Provider shall conduct its business using competitive and fair market practices and must not obtain confidential information on competitors by using illegal or unethical means. When tendering to procure goods or services to or for Simbec-Orion, the Service Provider shall not attempt to reach understandings with its competitors about prices or market allocation, or otherwise attempt to influence improperly the competitive process.

2.8 WHISTLE-BLOWING

Simbec-Orion strives to achieve transparency and a high level of business ethics. An employee should have the right to be protected from workplace retaliation for reporting injuries, safety concerns, or other protected activities. We are committed to a culture of openness so that individuals feel encouraged and confident to raise any concerns related to suspected misconduct. With the same commitment, we expect Service Providers to have a comprehensive whistleblowing policy which allows employees to report any incidents or concerns anonymously, safely and without repercussion. In the event that the Service Provider

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does not yet have a formal Whistleblowing policy, Simbec-Orion will work with the Service Provider to assess the pathways in place to raise concerns and plans for a formal Whistleblowing policy.

2.9 MODERN SLAVERY

Service Providers should ensure that slavery and human trafficking are not taking place in supply chains or in any part of their own business, act transparently and disclose information about any modern slavery risks they have identified and what actions they have taken in response to them. Service Providers should have procedures and safeguards mechanisms in place and provide reporting. If any Service Provider, their affiliates, or their supply chain are unable to demonstrate that they have a robust policy in place, we will seek assurance that they agree to act in accordance with this Code of Conduct.

Businesses providing labour presents unique risks and should ensure personnel are capable of recognising, preventing, and reporting modern slavery and have compliance checks to verify workers are being paid in line with minimum wage legislation. The Service Provider shall be responsible for their own, their affiliates and their third parties' procedures by undertaking due diligence including reporting the modern slavery and human trafficking risks of each. Service Providers must take steps to improve substandard practices, including providing advice and implementing actions appropriately. Service Providers that fail to improve their performance in line with an action plan or which seriously violate our code of conduct, risk the termination of our business relationship.

2.10 LABOUR & WORKING CONDITIONS

A safe and hygienic working environment shall be provided in line with the country's Health and Safety regulations and laws, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

Child labour is strictly prohibited. The minimum age for employment or work shall be the minimum age for employment in that country. When young workers (above the minimum age and below 18 years of age) are employed they must not do work that is mentally, physically, socially, or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school.

2.11 HEALTH & SAFETY SYSTEMS

Simbec-Orion implements and maintains an Occupational Health & Safety Management System (SMS) that aligns to ISO 45001, in conjunction with additional relevant regional and national industry standards. The health and safety management system are also practiced in association with other standards such as ISO 14001 via a simple model. Our Service Providers shall establish procedures to manage, track and train employees and report occupational injury and illness. Such procedures and systems shall encourage reporting, classifying, and record injury and illness cases. Simbec-Orion will expect the Service Provider to have its own Health & Safety policy and management system, ideally one that conforms to ISO Health and Safety Standards and records employees training.

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2.12 DIVERSITY AND DISCRIMINATION

The Service Provider shall respect and encourage equality, diversity and inclusion and should be committed to a workforce free of harassment and unlawful discrimination. The Service Provider shall not engage in discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training.

2.13 CONFIDENTIALITY, DATA PROTECTION AND CYBER SECURITY

The Service Provider has a duty to safeguard and to make appropriate use of Simbec-Orion assets, data and funds under its control. All information provided by Simbec-Orion shall be used only for its intended and designated purpose and in accordance with confidentiality agreements and data protection regulations. The Service Provider must respect intellectual property rights and secure Simbec-Orion (and its clients) proprietary information; transfer of technology must be done in a manner that protects intellectual property rights.

It is essential that Service Providers safeguard the security, integrity and privacy of their systems and our data by complying with all relevant legislation, policies, and standards applicable for the services. This may include relevant accreditation where appropriate and proactively monitor their systems and notify us of any security incidents that affect or have the potential to affect our data. Service Providers must inform Simbec-Orion Privacy team at privacy@simbecorion.com if they become aware of any cyber security incident that affects or has the potential to affect data integrity. The processing of digital information must be managed in line with industry standards and security best practice. Service Providers are required to have an appropriate level of technical and organisational security measures with controls in place to protect data at every stage of the supply chain process including network security to protect their systems against cyber-attacks and non cyber causes.

2.14 ENVIRONMENTAL MANAGEMENT

Simbec-Orion is committed to achieving sustainable growth whilst managing the impact of our business. We use natural resources efficiently and minimise waste where possible. We believe that growing our business and improving our environmental impacts should be achieved in parallel. We are consequently minimising our energy consumption and working to reduce our carbon intensity. We therefore expect our Service Providers to achieve sustainable growth by improving their environmental performance and encourage similar improvements further down their supply chain. Service Providers whose activities have an environmental impact shall have a structured and systematic approach to manage environmental aspects. We expect the Service Provider to have its own Environmental Management System, preferably certified to the current ISO 14001 standard or another internationally recognised standard. In the event that the Service Provider does not have an Environmental Management System, we will work with the Service Provider to understand the risks and any actions required.

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2.15 CARBON FOOTPRINT INITIATIVES

We expect the Service Provider to prevent pollution and minimise generation of waste, wastewater, and air emissions as a result of its business activities. The Provider shall have, or work towards a waste management system which aims to reduce the environmental impact as much as possible. The Service Provider is encouraged to take steps to minimise its impact through carbon footprint reduction initiative and have action plans to take steps to offset and reduce impact. Simbec-Orion encourages the Service Provider to share carbon footprint data so we are able to calculate the carbon footprint of our Supply Chain.

3 REPORTING

We would expect any Service Provider who experiences anything that is not aligned with this code of conduct to report it to us in the spirit intended to enable us to review and improve where possible. If a Service Provider considers that they or another business in their supply chain has deviated from or breached their obligations under this Code, it is expected to report these concerns to serviceprovidersprocess@simbecorion.com.

It is anticipated Service Providers will self-assess their compliance with this Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review.

Service Providers should support Simbec-Orion in reviewing compliance with this Code of Conduct and ensure a comprehensive whistleblowing policy is in place (or a robust procedure for raising concerns if a formal policy is not yet in place) which allows employees to report any incidents or concerns anonymously, safely and without repercussion.

We are keen to embed and build upon this code of conduct in future years and as such we intend to review on a regular basis.

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5 PREVIOUS VERSION HISTORY

Previous Version	Current Version	Details of change
N/A	1.0	Not applicable – first version

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Document Approvals
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Task: Approvers Approval Verdict: Approve changes & release Approval to be made Effective	Joanne Robson, (joanne.robson@simbecorion.com) Approver 19-Jun-2024 14:50:26 GMT+0000
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Task: QA Approval Verdict: Approve changes & release QA Approval to be made Effective	Anne Hall, (anne.hall@simbecorion.com) QA Approver 19-Jun-2024 14:51:33 GMT+0000
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