



EMPOWER CONSULTING LIMITED
EASY SOLUTION

ECL-CMP-004 REV.00

SUPPLIER CODE OF CONDUCT

1. PURPOSE

This Supplier Code of Conduct establishes the principles, values and standards of conduct that **Empower Consulting Limited** expects from all its suppliers, subcontractors, consultants, business partners and any other organization providing goods or services to the Company.

Empower Consulting Limited believes that business relationships founded on integrity, transparency, professionalism and mutual respect are essential to ensuring service quality, sustainable business relationships and the protection of the interests of all stakeholders.

Through this Code, the Company promotes a corporate culture based on responsibility, integrity, regulatory compliance and continual improvement, encouraging its suppliers to adopt equivalent ethical principles in the conduct of their own business activities.

This document forms an integral part of Empower Consulting Limited's Corporate Compliance Framework and should be read in conjunction with the Code of Ethics and Business Conduct, the Anti-Bribery & Anti-Corruption Policy, the Information Security Policy, the Whistleblowing Policy, and all other applicable corporate policies.

2. SCOPE

This Code applies to all suppliers, subcontractors, consultants, business partners, service providers and any other legal entity or individual engaged in a business relationship with Empower Consulting Limited.

The Company expects all recipients of this Code to conduct their activities in accordance with the principles set out herein and to promote equivalent standards of conduct within their own organizations and, where applicable, throughout their supply chains.

Acceptance of this Code forms an integral part of the commitment to developing business relationships based on trust, transparency and compliance with applicable laws and regulations.

Empower Consulting Limited encourages its suppliers to foster a corporate culture focused on responsibility, sustainability and continual improvement, recognizing that successful business relationships depend upon the

shared commitment of all parties involved.

3. PRINCIPLES EXPECTED OF SUPPLIERS

Empower Consulting Limited develops its business relationships on the basis of integrity, transparency, professionalism and accountability.

The Company expects all suppliers, subcontractors, consultants, business partners and service providers to embrace these principles and apply them throughout their business activities, contributing to the development of reliable, sustainable and long-term business relationships.

Suppliers are encouraged to implement management systems, procedures and business practices consistent with the principles contained in this Code, promoting a corporate culture founded on legality, respect for people, information protection, service quality and continual improvement.

Empower Consulting Limited recognizes that the quality and reliability of its supply chain depend upon the ability of all parties involved to operate with responsibility, fairness and transparency.

4. COMPLIANCE STANDARDS

Empower Consulting Limited expects all suppliers to conduct their activities in accordance with the principles contained in this Code and with all applicable laws and regulations in the countries where they operate.

The following standards establish the minimum behavioural expectations for all suppliers, subcontractors, consultants and business partners working with the Company. Compliance with these standards contributes to building business relationships founded on integrity, transparency, accountability and mutual trust.

4.1 BUSINESS ETHICS

Suppliers shall conduct their business activities with honesty, fairness, impartiality and professionalism, adopting practices consistent with the principles of business ethics and fair competition.

All business decisions shall be made independently and objectively, avoiding any conduct that could compromise the integrity of the business relationship or adversely affect the reputation of Empower Consulting Limited.

4.2 ANTI-BRIBERY AND ANTI-CORRUPTION

Suppliers shall conduct their activities with the highest standards of integrity, rejecting all forms of bribery, extortion, improper payments, fraud or any other unethical conduct.

They are expected to comply with all applicable anti-bribery and anti-corruption laws and regulations and to implement reasonable measures to prevent practices that could undermine the transparency and integrity of business relationships.

4.3 HUMAN RIGHTS AND WORKING CONDITIONS

Suppliers shall respect internationally recognized human rights and provide working conditions that are safe, fair and compliant with applicable legislation.

Forced labour, human trafficking, child labour, exploitation, discrimination, harassment or any other practice incompatible with respect for human dignity shall not be tolerated.

Suppliers are further encouraged to promote equal opportunities, diversity, inclusion and mutual respect throughout their organizations.

4.4 HEALTH, SAFETY AND ENVIRONMENT

Suppliers shall be committed to providing safe and healthy working environments by implementing appropriate measures to prevent accidents, injuries and occupational illnesses.

They are also encouraged to conduct their operations in an environmentally responsible manner by promoting the sustainable use of natural resources, preventing pollution and, where applicable, reducing environmental impacts.

Empower Consulting Limited considers the protection of health, safety and the environment to be fundamental elements in developing sustainable and responsible business relationships.

4.5 CONFIDENTIALITY AND INFORMATION PROTECTION

Suppliers shall protect all confidential, technical, commercial and other proprietary information received from **Empower Consulting Limited** and use such information solely for purposes directly related to the contractual relationship.

Appropriate organizational and security measures shall be implemented to prevent unauthorized access, loss, improper disclosure or misuse of information, in accordance with applicable legal and regulatory requirements.

4.6 QUALITY OF PRODUCTS AND SERVICES

Suppliers shall ensure that the goods and services they provide meet contractual requirements, agreed quality standards and all applicable legal and regulatory obligations.

Empower Consulting Limited encourages its business partners to pursue continual improvement of their processes, promoting reliability, efficiency and the consistent quality of their products and services.

4.7 LEGAL AND REGULATORY COMPLIANCE

Suppliers shall conduct their business activities in full compliance with all applicable laws, regulations and contractual obligations in the jurisdictions where they operate.

Upon request, suppliers shall be able to demonstrate compliance with applicable legal requirements and with the principles contained in this Code through appropriate documentation, records or other supporting evidence.

Any conduct that could expose **Empower Consulting Limited** to legal, financial, operational or reputational risks shall be considered incompatible with the principles set out in this Code.

4.8 CONFLICTS OF INTEREST

Suppliers shall avoid any situation that may create actual, potential or perceived conflicts of interest in connection with their business relationship with Empower Consulting Limited.

Any circumstance that could compromise the independence, objectivity or impartiality of the business relationship shall be promptly disclosed to the Company.

Business decisions shall be based exclusively on objective professional criteria and on the proper execution of the contractual relationship.

4.9 COMPLIANCE WITH INTERNATIONAL SANCTIONS AND TRADE CONTROLS

Suppliers shall conduct their activities in compliance with all applicable international sanctions, export control regulations, trade restrictions and other laws governing international trade.

They are expected to adopt appropriate measures to prevent any involvement in activities that could result in violations of applicable legislation or expose **Empower Consulting Limited** to legal or reputational risks.

5. MONITORING AND COMPLIANCE

Empower Consulting Limited is committed to developing and maintaining business relationships founded on mutual trust, transparency and adherence to the principles set out in this Code.

In support of a responsible supply chain aligned with its Corporate Compliance Framework, the Company reserves the right to verify, in a proportionate manner and in accordance with applicable laws and contractual arrangements, that its suppliers operate in compliance with the principles and requirements established in this Code.

Suppliers are expected to cooperate with **Empower Consulting Limited** by providing, where reasonably requested, information, documentation or other appropriate evidence demonstrating compliance with the principles contained in this Code and with applicable legal and regulatory requirements.

Where situations of non-compliance or conduct inconsistent with the principles of this Code are identified,

Empower Consulting Limited will, where appropriate, adopt a collaborative approach focused on dialogue and continual improvement, requesting the implementation of appropriate corrective actions or improvement plans within agreed timeframes.

In cases of serious or repeated violations, or where a supplier fails to cooperate, the Company reserves the right to take any contractual measures it considers appropriate, including the suspension or termination of the business relationship, in accordance with applicable laws and contractual obligations.

Empower Consulting Limited regards compliance monitoring not only as a means of protecting its own interests, but also as a tool for strengthening transparent, responsible and sustainable business relationships while supporting the continual improvement of its entire supply chain.

6. REVIEW AND CONTINUAL IMPROVEMENT

This Supplier Code of Conduct is subject to periodic review to ensure its continued suitability, effectiveness and alignment with the evolution of the Company's business activities, applicable legal and regulatory requirements, and internationally recognized best practices in responsible supply chain management.

Any revisions to this Code shall be approved by the Managing Director and communicated to the relevant stakeholders through the Company's appropriate communication channels.

Empower Consulting Limited considers the continual improvement of its relationships with suppliers to be a fundamental element of its Corporate Compliance Framework and promotes collaboration based on trust, transparency, shared responsibility and the creation of long-term value.

DOCUMENT INFORMATION

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