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[OPEN]

# Buypass Suppliers Code of Conduct

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# Suppliers code of conduct

These guidelines describe the basic requirements Buypass places on its suppliers and partners in relation to conducting responsible and ethical business.

## 1 Who do the guidelines apply to?

Suppliers and collaboration partners (hereafter collectively referred to as suppliers) to Buypass are obliged to comply with the requirements arising from this document in their own operations, relevant legislation, and internationally recognized conventions. This applies to all countries in which the supplier operates. The supplier is obliged to pass on corresponding provisions to its subcontractors. To ensure compliance with the ethical guidelines, Buypass can require the supplier to:

- Conduct follow-up interviews with Buypass and/or
- Explain where goods are produced and/or
- Deliver self-declaration.

## 2 Human rights and labour conditions

### 2.1 Non-discrimination and equal opportunities

Employees are hired and treated in a manner that does not discriminate regarding gender, nationality, religion, race, age, disability, sexual orientation, political opinion, union membership, or social or ethnic origin. The Supplier promotes the idea that all employees shall be treated with equal respect and dignity.

Furthermore, the Supplier promotes a culture of equal opportunities and diversity where appointments to jobs, rewarding and personal success depend on individual ability and performance. Fundamental human rights shall be known, understood, and respected and applied equally to all employees whether temporarily or permanently hired, or contracted.

### 2.2 Physical abuse and forced labour

Employees shall not be subject to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse. Child labour or other forms of compulsory or forced labour, including trafficking, are not accepted. Regarding child labour, the ILO convention No. 138 on the minimum age for admission to employment and work must be respected. No one under 15 years of age or below the country's legal minimum age is employed by Buypass's subcontractors.

Forced labour means "all work or service, which is exacted from any person under the menace of any penalty and for which the said person has not offered himself / herself voluntarily". Examples of forced labour are for example withholding wages or identity documentation, restricting movement, fraudulent debt, violence, threat or intimidation.

### 2.3 Fair labour conditions

The Supplier supports the freedom of association, and all employees have the right to be a member of a trade union and to bargain collectively.

### 2.4 Wages and benefits

Suppliers should strive to pay all workers a wage that meets basic needs and provides a discretionary income in compliance with all national applicable laws.

Employees with the same qualifications, experience and performance have the right to equal pay for equal work with respect to their relevant comparators. Men and women should be equally remunerated. Working hours and overtime must be kept within local legal limits.

## 2.5 Health and safety

All employees are provided with safe and healthy working conditions and environments. Adequate steps to prevent accidents and injury to health shall be taken by minimizing the causes of hazards inherent in the working environment and by providing appropriate safety equipment.

# 3 Environment

The Supplier shall have a precautionary approach to minimize environmental impacts within its value chain. Electronic waste, for example obsolete servers, computers, and other ICT goods, must be recycled without harming the environment and with respect to human rights. The Supplier shall acknowledge environmental legislation and applicable regulations and be able to provide evidence of compliance.

# 4 Anti-corruption and fair business practices

## 4.1 Anti-corruption

No abuse of power, nepotism, or bribery, including improper offers of payments to or from employees or organisations, shall be tolerated. Gifts or similar benefits may only be offered to, or accepted from, a third party if modest in value and if consistent with reasonable hospitality given in the ordinary course of business.

## 4.2 Fair competition

Buypass is firmly committed to fair competition and open markets. We require free and fair competition and expect the Supplier to always compete as forcefully and constructively as possible while complying with international and national competition law and regulations.

## 4.3 Conflict of interest

Business decisions shall always be made in the best interest of the companies involved, i.e., the Supplier and Buypass both. Personal relations or considerations will never influence decision-making. Should there be any risk, however small, of conflict of interest, our employees are instructed to immediately inform their manager.

## 4.4 Fraud, extortion, money laundering and other related crimes

The Supplier shall abide by all applicable national and international regulations aiming at preventing, detecting, and remedying economic crime and fraud, extortion, money laundering and other related crimes. Buypass employees will refrain from any act or omission in connection to such criminal activities and shall actively cooperate with any inquiry in relation to such crimes.

## 4.5 Trade and sanctions compliance

The Supplier shall ensure that their business practices are in accordance with applicable regulation governing the import/export of their deliverables. The Supplier shall provide truthful and accurate information and obtain export licenses and consents, where necessary. The Supplier warrants that it or its shareholders are not subject to any economic or administrative sanctions.

## 4.6 Insurance coverage

The Supplier is obliged to ensure that there are accurate and complete insurance schemes covering its operations, services, and products.

## 4.7 Political involvement

The Buypass name, or any resources controlled by Buypass, shall not be used to promote the interests of political parties or candidates.

## 5 Compliance and sanctions

### 5.1 Continuous improvement and management systems

Supplier is required to have appropriate management systems to enable adherence to this Code. The functioning and quality of the management system shall be in proportion to the size, complexity, and risk environment of the Supplier's business. This means that Supplier shall adopt a systematic approach to the assessment, mitigation and management of risks, measurable performance targets and monitoring and follow up of them. In addition, adequate communication and training about the requirements should take place.

### 5.2 Breach reporting

Should the Supplier find any obstacles in meeting the requirements or find any breaches, those shall be reported immediately to the Supplier's main contact in Buypass or report anonymously and confidentially to the Quality & Risk Manager of Buypass by email: [sqm@buypass.no](mailto:sqm@buypass.no)

*Actions inconsistent with the Supplier Code must be promptly corrected and may be subject to sanctions. In event of material breach Buypass is entitled to terminate the agreement with an immediate effect. Adequate communication and training about the requirements should take place.*

## 6 Communication and auditing

The Supplier shall provide Buypass with necessary information and allow Buypass or its representatives with an access to the Supplier's relevant premises and documentation to verify that the Supplier, its employees, relevant affiliated companies, and subcontractors comply with this Supplier Code.

The Supplier undertakes to provide all necessary information of its management systems, environmental performance, and all other relevant information to verify your compliance with this Supplier Code when Buypass requires for reporting purposes.

The Supplier and Buypass state that they will actively seek ways for further improvement in the areas of sustainability.

The content of this Supplier Code shall be reviewed on an ongoing basis.

## Policy link

This rule is linked with the [Buypass Code of Conduct](#).