

Supplier Code of Conduct

Introduction

Avinto is dedicated to operating in an ethical and responsible manner both internally and in our business relationships. Avinto requires that all suppliers agree to ethical business practices and sustainable development, adopting zero tolerance for modern slavery, corruption, or child labour.

The standard of business ethics that applies to all suppliers in their commercial engagement with Avinto is outlined in the Supplier Code of Conduct or “SCoC.” A report is required for any suspected or proven cases of violations of the SCoC in their business activities related to Avinto. In the event of a violation of SCoC, responsible persons shall promptly take the required corrective action, without any expense to Avinto.

If any supplier or their representatives violate this SCoC, Avinto may suspend business operations or professional engagement and, in extreme circumstances, file a civil lawsuit. When accusations of non-compliance are made, Avinto will respond to them in a responsible and appropriate manner through our whistleblowing channel.

1. Compliance with the law

Suppliers are required to abide by all applicable Norwegian and Nepali or other relevant countries’ laws and rules. In the event that a requirement in this SCoC deviates from national laws or regulations, the supplier shall adhere to the more restrictive one.

2. Business ethics

2.1 Corruption and Bribery



Avinto adopts a zero-tolerance policy regarding bribery and corruption. All suppliers shall abide by all applicable laws and rules regarding unethical business practices such as fraud, bribery, and corruption. In order to maintain, acquire, or achieve any kind of economic advantage, they must refrain from accepting, seeking, receiving, or giving any favors, presents, or hospitality of considerable value.

2.2 Money laundering

All suppliers must abide by any anti-money laundering rules and regulations that are applicable to them and take preemptive steps to prevent third parties from abusing their financial transactions.

2.3 Fair business conduct

All suppliers must operate businesses fairly, ethically, and in compliance with antitrust rules and regulations in order to foster healthy competition.

2.4 Conflict of interest

All suppliers must refrain from engaging in conflicts of interest with Avinto. This includes dealings with an Avinto representative that could potentially result in a conflict of interest given the representative's duty to act in the organization's best interests. In the event that a real or prospective conflict of interest arises, suppliers are required to notify all relevant parties promptly.

2.5 Privacy and Confidentiality

All suppliers handling sensitive and personal data must abide by all applicable data privacy laws and regulations. They shall adopt technological and organizational precautions to safeguard security against potential risks. Additionally, all suppliers must abide by the

information and confidentiality requirements of the contract and refrain from disclosing to other parties any private or sensitive business data.

2.6 Compliance with trade regulations

All suppliers are required to abide by laws governing international trade, such as export control laws and any other applicable sanctions regimes, such as those imposed by the US, UN, EU, and Norway. Avinto will verify that current and prospective suppliers are in compliance with all applicable sanctions.

3. Human rights and working conditions

3.1 Protection of human and labour rights

All suppliers must abide by all applicable national and international regulations, as well as other laws pertaining to the protection of labour and human rights. They must implement procedures and policies to reduce violations of labour and human rights.

3.2 Working environment and employment conditions

All suppliers are required to promote an inclusive and diverse work environment that is free from any form of verbal, indirect, or direct harassment, bullying, or discrimination. They must take action to ensure that everyone has equal access to opportunities and abide by all applicable laws pertaining to wages and working conditions.

3.3 Health and safety

In compliance with all laws and regulations that are applicable to its operations, all suppliers are required to safeguard the health, safety, and welfare of their employees, guests, and the general public from health and safety hazards. They shall be responsible for ensuring that

employees are aware of the risks associated with their jobs, safe work practices, and regular, sufficient training.

3.4 Modern slavery, child or forced labour

All suppliers are prohibited from using, supporting, or tolerating the use of forced labour, child labour, or human trafficking. The International Labour Organization (ILO) defines child labour as any employment by anyone under the age of fifteen (15) or under the age at which they have completed their mandatory education, whichever is higher.

3.5 Association and collective bargaining

All suppliers are required to uphold workers' rights to form and/or join unions, engage in collective bargaining, and join them.

4. Environment

All suppliers shall take preemptive actions to address environmental issues and initiate campaigns to encourage better environmental responsibility. They are required to follow all applicable laws and regulations, obtain all required environmental approvals, permits, and registrations, and actively contribute to the protection of the environment.

Suppliers are expected to uphold Avinto's environmental pledges and carry out ongoing efforts to lessen the environmental effects of their business operations.