

Apogee Supplier Code of Ethics

Our Commitment

Apogee Corporation Limited is committed to conducting business with the highest standards of integrity, transparency, and respect for all stakeholders. As a leader in Managed Workplace Services and driven by our comprehensive Environmental, Social, and Governance (ESG) strategy, we strive to uphold ethical principles and responsible practices throughout our operations and supply chain.

This Supplier Code of Ethics outlines our fundamental expectations for ethical conduct and responsible business practices from all our suppliers, contractors, and business partners ("Suppliers"). By engaging with Apogee, Suppliers commit to adhering to these standards, or to demonstrably higher standards, in all their activities relevant to Apogee and their wider operations.

Ethical Principles

1. **Legal and Regulatory Compliance** Suppliers must comply with all applicable national and international laws, regulations, and industry standards in all countries where they operate. This includes, but is not limited to, laws related to:
 - Labour practices (e.g., working hours, minimum wage, non-discrimination).
 - Environmental protection.
 - Anti-bribery and corruption.
 - Data protection and privacy.
 - Health and safety.
 - Modern slavery and human trafficking.
 - Fair competition and antitrust.
2. **Human Rights and Labour Practices** Suppliers must respect the human rights of their employees and provide fair and safe working conditions. This includes, but is not limited to:
 - **Prohibition of Forced Labour:** Upholding a zero-tolerance policy against all forms of modern slavery, forced, bonded, indentured, or compulsory labour, and human trafficking.
 - **Prohibition of Child Labour:** Strictly prohibiting the employment of children below the minimum legal working age in any relevant country.
 - **Non-Discrimination & Harassment:** Ensuring a workplace free from any form of unlawful discrimination, harassment (including sexual harassment), intimidation, or retaliation based on age, disability, gender, race, religion, sexual orientation, or any other protected characteristic. Suppliers must have clear policies and procedures for prevention, reporting, investigation, and appropriate disciplinary action related to harassment.
 - **Fair Wages and Benefits:** Paying employees at least the prevailing minimum wage as required by law and providing legally mandated benefits.
 - **Working Hours:** Complying with all applicable laws regarding working hours, overtime, and rest periods.

- **Freedom of Association:** Respecting employees' rights to freedom of association and collective bargaining as allowed by law.
3. **Environmental Responsibility** Suppliers must minimize their environmental impact by adopting sustainable practices, promoting resource conservation, and reducing pollution. This includes:
- Complying with all applicable environmental laws and regulations.
 - Adopting practices to reduce waste, emissions (including greenhouse gases), and water consumption.
 - Promoting energy efficiency in their operations.
 - Considering the environmental impact of products and services throughout their lifecycle.
 - Disposing of waste responsibly and legally.
4. **Business Integrity and Anti-Bribery & Corruption** Suppliers must conduct business with honesty, integrity, and transparency.
- **Prohibition of Bribery and Corruption:** Strictly prohibiting any form of bribery, corruption, extortion, or fraud. This includes not offering, promising, giving, demanding, or accepting any improper advantage to influence business decisions. Facilitation payments are strictly prohibited.
 - **Fair Competition:** Competing fairly and complying with all antitrust and competition laws, avoiding anti-competitive agreements, price-fixing, or bid rigging.
 - **Gifts and Hospitality:** Avoiding offering or accepting gifts, hospitality, or entertainment that could be construed as an attempt to influence business decisions or gain an unfair advantage. Such activities must be reasonable, proportionate, transparent, properly recorded, and comply with applicable laws and regulations.
 - **Associated Persons:** Suppliers are responsible for ensuring their employees, agents, representatives, and any other person acting on their behalf comply with this Code, acknowledging that Apogee can be held liable for acts of bribery or corruption committed by its associated persons.
 - **Accurate Records:** Maintaining accurate and transparent records to reflect all business dealings.
5. **Information Security and Data Protection** Suppliers must protect Apogee's confidential information and personal data.
- Complying with all applicable data protection and privacy laws and regulations (e.g., GDPR, Data Protection Act).
 - Implementing and maintaining appropriate technical and organizational security measures to protect information assets.
 - Ensuring data privacy and reporting any security breaches or concerns promptly to Apogee.
 - Adhering to contractual data processing agreements (DPAs) and information sharing agreements (ISAs) with Apogee.

Supplier Responsibilities

Suppliers are expected to:

- **Communicate and Implement:** Disseminate this Code of Ethics to their employees, subcontractors, and other business partners, and implement appropriate management systems (e.g., internal policies, procedures, training) to ensure compliance with this Code.
 - **Review and Update:** Regularly review and update their own policies and procedures to align with or exceed the standards outlined in this Code.
 - **Cooperate with Apogee:** Cooperate fully with Apogee in conducting any due diligence, audits, or assessments of their compliance with this Code.
 - **Immediate Reporting:** Immediately report any concerns or suspicions of bribery, corruption, modern slavery, human trafficking, or other unethical practices to Apogee.
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Apogee's Commitment

Apogee is committed to working with suppliers who share our values and ethical principles. We will provide support and guidance to our suppliers to help them meet our Code. We will also monitor supplier compliance with this Code of Ethics and take appropriate action in the event of non-compliance. Where risks or non-conformances are identified, Apogee will work collaboratively with suppliers towards remediation where feasible. However, repeated non-compliance or a failure to address serious breaches may lead to the termination of the business relationship.

Reporting Concerns

Suppliers are encouraged to report any concerns or violations of this Code of Ethics to Apogee's Compliance team via compliance.support@apogeecorp.com or through Apogee's confidential whistleblowing channels as outlined in Apogee's **Whistleblowing Policy**. All reports will be investigated in a confidential and timely manner, and individuals reporting concerns in good faith will be protected from retaliation.