



Supplier Code of Conduct

Introduction

Toros Consulting ("Toros") is committed to the highest standards of integrity and social responsibility, and Toros expects all its Suppliers engaged in providing products and services to Toros ("Suppliers") to have or to make a similar commitment. The Toros Supplier Code of Conduct ("Code") describes Toros' expectations of how its suppliers conduct business. Toros expects suppliers to act according to the Code. At a minimum, all Suppliers must comply with applicable laws and regulations within the geographies where they operate and be open and cooperative with the regulators enforcing such laws. In instances where expectations outlined in the Code differ from local laws, Suppliers must follow these expectations within the bounds of applicable local laws.

Overview

Direct connection of two pieces of IT equipment using a dedicated cable rather than a generic cabling system.

The Code reflects Toros' values and sets forth what is expected of its Suppliers concerning the following topics:

- Ethics and integrity.
- Data privacy and security.
- Inclusion and diversity.
- Employment and working conditions.
- Wellbeing, health, and safety.
- Environment.

Ethics and integrity

Toros is committed to the highest ethical standards and compliance with all applicable laws, rules, and regulations. Toros requires Suppliers to adhere to the following standards:

Anti-Bribery and corruption

Suppliers must fully comply with the requirements of all applicable anti-bribery and anti-corruption laws (e.g., the UK Bribery Act and the US Foreign Corrupt Practices Act).



Gifts and entertainment

Suppliers must not offer or accept any gift to obtain improper advantages or influence for the Supplier, Toros (such as Toros' employees and their family members and associates), or any third party. Gifts include benefits, fees, commissions, dividends, cash, gratuity, services, or any inducements.

Non-retaliation for reports of concern

Toros expects Suppliers to have a policy and process for reporting workplace concerns. The policy and process should be transparent and understandable and protect reporting and participating individuals from retaliation.

Data privacy and security

Toros requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information.

Confidential assets and information

Suppliers must protect Toros' and its clients' confidential assets and information. Suppliers must design and maintain processes to provide appropriate protection for this information.

Personal information and privacy

Toros requires Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of Toros should only be used, accessed, and disclosed as permitted by the Supplier agreement.

Inclusion and diversity

Toros fosters an inclusive culture and believes diversity should be celebrated and discrimination of any form should not be tolerated.

Supplier diversity

As one component of Toros' long-standing commitment to advancing diversity and inclusion, Toros actively promotes relationships with diverse and underrepresented businesses in its strategic sourcing and procurement process. Toros searches for Suppliers that similarly value diversity in Suppliers' own supply chains and that support Toros' goals concerning supplier diversity. Toros expects Suppliers to (i) utilise search and assessment processes that are both unbiased and transparent, (ii) ensure that Suppliers' procurement teams proactively provide diverse businesses with fair access to bids, and (iii), where practicable, actively seek out and provide opportunities for diverse suppliers to participate in business opportunities.



Employment and working conditions

Toros supports the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. Toros strives to adhere to the principles outlined in these standards and expects its Suppliers to do the same.

Modern slavery / human trafficking

Toros does not tolerate slavery, forced labour, or human trafficking in any form. Toros requires Suppliers to comply with the applicable legal requirements of slavery fully, forced labour and human trafficking laws (e.g., UK Modern Slavery Act 2015), and expects Suppliers to enact practices to ensure compliance with such laws.

Child labour

Toros does not tolerate child labour in any form. Suppliers must comply with all laws regulating the minimum working age for each position, including any laws pertaining to the employment, apprenticeships, and internships of youths and students.

Human rights

Toros does not tolerate human rights violations in any form. Toros expects Suppliers to enact practices to maintain a respectful and safe workplace. Toros expects Suppliers not to tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behaviour, bullying or harassment of any kind.

Employment laws

Suppliers must comply with all applicable local wage and labour laws. Toros expects Suppliers to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch and outsourced labour shall be in accordance with local law.

Wellbeing, health, and safety

Toros expects Suppliers to implement sound health and safety practices throughout their business operations.

Health and Safety

Suppliers must comply with all applicable health and safety laws and regulations. Toros expects Suppliers to adopt practices to minimise health and safety risks, support accident prevention, and ensure a safe workspace for all workers.



Environment

Toros is committed to reducing the impact of its operations on the natural environment and working with its Suppliers to do the same.

Environmental footprint

Suppliers must comply with all applicable environmental laws and regulations. Toros expects Suppliers to address Suppliers' environmental risk and impact. Toros expects Suppliers to measure, manage, and address energy usage and greenhouse gas (GHG) emissions. And, where applicable, Toros expects its Suppliers to measure, manage and reduce water and waste in its operations.

Compliance with the Code

Violations

Suppliers must promptly report legal violations of the Code or other Toros policies to Toros. Suppliers must promptly forward any subpoenas, regulatory requests, media inquiries, or other third-party requests concerning Toros to Toros if permitted by law. To report a violation or other information, please email privacy@toros.consulting. Toros will keep the reported information confidential, provided it does not hinder any investigation and is permitted to do so by law.

Toros' rights

Toros reserves the following rights to ensure and enforce Suppliers' compliance with the Code. Toros will evaluate Suppliers' compliance with the Code during the Suppliers' evaluation and selection process or upon Toros' request.

Supplier assessment

During the Supplier certification process, Suppliers must complete a self-assessment questionnaire on compliance with the Code. Suppliers may be asked to reaffirm compliance with the Code periodically. Upon request, the Supplier will provide written information on its policies and practices related to compliance with the Code. Toros is committed to working with Suppliers to improve performance on topics addressed by this Code and expects Suppliers to agree to work together with Toros to address applicable and relevant topics jointly.

Violations and termination

Supplier shall ensure that its subcontractors, if any, comply with the Code and acknowledge that it is responsible for its subcontractors' violations. In the event of non-compliance with, or violation of, the Code, Toros may give the Supplier a reasonable opportunity to respond with proposed corrective actions unless the violation is severe or incurable or there is a violation of law. Toros may suspend or



terminate its relationship with the Supplier and/or disclose the matter to the appropriate authorities if there is a violation of law.

Order of Precedence; changes to the Code

The Code is not meant to supersede any applicable law or any term in an agreement between Toros and a Supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls. Toros reserves the right to update or change the Code requirements.

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