

## **SUPPLIER CODE OF CONDUCT**

Zen Technologies Limited is dedicated to conducting its business in an ethical, responsible, and sustainable manner across all aspects of its supply chain. This Supplier Code of Conduct sets out the minimum standards and expectations that must be adhered to by all suppliers, subcontractors, and service providers (“**Suppliers**”) associated with Zen Technologies.

Zen Technologies upholds strong commitments to human rights, fair labour practices, environmental responsibility, and ethical conduct, both within the organisation and across its business relationships. The Company follows a zero-tolerance approach towards any form of corruption, forced or bonded labour, modern slavery, and child labour, in both public and private engagements.

Suppliers play a vital role in Zen Technologies’ business ecosystem and are recognised as key partners in achieving the Company’s objective of continuously strengthening and improving supply chain management practices.

Accordingly, Zen Technologies expects all Suppliers to demonstrate a firm commitment to responsible business conduct and sustainable development. All business activities, irrespective of the location of operations, must be carried out in compliance with this Supplier Code of Conduct as well as applicable laws and regulations.

### **1. Compliance with Laws**

Suppliers must comply with all laws and regulations applicable to their business, including the local laws and regulations of all countries outside their home country in which operations are managed or services are provided.

### **2. Human Rights:**

Suppliers shall conduct all business activities with due respect for human rights and dignity of all individuals. Suppliers are expected to provide fair, safe, and inclusive working conditions and ensure ethical employment practices across their operations.

Suppliers must:

- Treat all workers with dignity, fairness, and respect, and maintain a workplace free from harassment, abuse, discrimination, or intimidation.
- Comply with all applicable labour and employment laws relating to wages, working hours, benefits, and working conditions.
- Prohibit the use of child labour, forced labour, bonded labour, indentured labour, and human trafficking in any form.
- Ensure that employment is freely chosen and that all work is performed voluntarily.

- Protect young workers below the age of 18 from hazardous or harmful work.
- Respect the right of employees to freely leave the workplace after completion of their assigned work and to terminate employment after reasonable notice.
- Identify, prevent, and mitigate actual or potential adverse human rights impacts arising from their operations or business relationships.

### **3. Employment Practices**

Suppliers shall follow fair, ethical, and lawful employment practices and ensure a safe, respectful, and inclusive workplace.

#### **3.1. Harassment:**

- Maintain a work environment free from physical, verbal, psychological, or sexual harassment.
- Prohibit intimidation, threats, abuse, or any inappropriate conduct at the workplace.
- Implement procedures to prevent, report, and address harassment-related concerns.

#### **3.2. Diversity, Equity, and Inclusion:**

- Treat all employees with dignity, respect, and fairness.
- Prohibit discrimination in employment on the basis of gender, age, caste, religion, race, colour, nationality, disability, marital status, sexual orientation, political beliefs, or any other legally protected characteristic.
- Ensure equal opportunity in recruitment, compensation, training and promotion based solely on merit and capability.
- Allow open communication between employees and management without fear of retaliation or unfair treatment.
- Respect employees' rights to freely associate, organise, or engage in collective dialogue, in line with applicable laws.

#### **3.3. Wages and Benefits:**

- Pay employees wages that meet or exceed the minimum standards prescribed under applicable laws.
- Provide all statutory benefits, as required by law.

#### **3.4. Working Hours:**

- Comply with legal requirements relating to working hours, rest periods and leave entitlements.

- Ensure overtime work is voluntary and does not exceed permissible limits.

#### **4. Information Protection**

Suppliers shall safeguard all information received or accessed in the course of business and ensure responsible handling of data and intellectual assets.

##### **4.1. Protection of Confidential and Sensitive Information:**

- Protect all confidential, sensitive, and proprietary information belonging to Zen Technologies, its customers, employees, and business partners.
- Comply with all applicable data protection, privacy, and cybersecurity laws and regulations.
- Prevent unauthorised access, loss, misuse, alteration, or disclosure of information through appropriate physical, technical, and administrative controls.
- Implement suitable information security and IT safeguards to address emerging cyber and data security risks.
- Restrict access to information strictly on a need-to-know basis.
- Promptly notify Zen Technologies of any suspected or confirmed data breach, cyber incident, or security vulnerability and cooperate fully in remedial actions.

##### **4.2. Intellectual Property:**

- Respect and protect intellectual property rights in accordance with applicable laws and contractual obligations.
- Use proprietary information, designs, data, software, or materials only for authorised business purposes.
- Refrain from unauthorised disclosure, copying, or misuse of intellectual property belonging to Zen Technologies.
- Ensure that employees and subcontractors are aware of and comply with intellectual property protection requirements.

#### **5. Business Ethics**

Suppliers shall conduct all business activities with integrity, transparency, and accountability and comply with all applicable laws and ethical standards.

##### **5.1. Anti-Corruption and Compliance:**

- Comply with all applicable anti-bribery and anti-corruption laws and regulations.
- Maintain appropriate internal controls and processes to identify, prevent, and address corruption-related risks.

##### **5.2. Bribery and Improper Payments:**

- Not offer, promise, give, solicit, or accept any form of bribe, kickback, or improper benefit, whether directly or indirectly.
- Prohibit facilitation payments or unofficial payments made to secure or expedite routine government or business actions.
- Avoid any transactions intended to improperly influence decisions or secure unfair business advantage.

### **5.3. Fraud and Misrepresentation:**

- Refrain from engaging in fraudulent, deceptive, or dishonest practices.
- Ensure accuracy and transparency in all records, communications, and representations.
- Not misappropriate funds, assets, information, or property belonging to Zen Technologies.

### **5.4. Fair Competition:**

- Conduct business in compliance with applicable competition laws.
- Avoid agreements or practices that restrict fair competition, including price fixing, bid rigging, market allocation, or sharing sensitive commercial information with competitors.
- Compete fairly and ethically in all markets.

### **5.5. Conflict of Interest**

- Avoid situations where personal interests conflict, or appear to conflict, with business responsibilities.
- Promptly disclose any actual, potential, or perceived conflict of interest, including those involving relatives, close associates, or financial interests.

## **6. Environment, Health and Safety**

Suppliers are expected to operate responsibly and ensure the protection of the environment, employees, and communities affected by their operations.

- Minimise environmental impact by reducing greenhouse gas emissions and improving energy efficiency through sustainable practices.
- Use natural resources, including water, energy, and raw materials, efficiently and responsibly.
- Prevent pollution by ensuring the safe handling, storage, treatment, and disposal of waste, chemicals, and hazardous materials.

- Comply with all applicable environmental, occupational health, and safety laws, regulations, and permit requirements.
- Provide a safe and healthy working environment by identifying workplace hazards and implementing appropriate preventive and control measures.
- Ensure employees receive adequate health and safety training, protective equipment, and emergency preparedness support.
- Take steps to prevent accidents, injuries, and work-related illnesses and promptly address any unsafe conditions.
- Avoid activities that may lead to deforestation, biodiversity loss, or harmful land-use practices.
- Promote responsible and sustainable sourcing practices across operations and the supply chain.
- Monitor environmental, health, and safety performance and implement corrective actions where risks are identified.

## **7. Compliance, Monitoring & Reporting**

Suppliers must maintain systems that support compliance with this Code, manage risks, and implement corrective actions when required. Suppliers may be required to provide relevant documentation, offer visibility into their supply-chain practices, or participate in reviews, audits, or assessments to demonstrate compliance with this Code. Continuous commitment to responsible labor practices, environmental stewardship, and ethical conduct is expected across all supplier operations and their broader supply chain.

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