

AXIOM: SUPPLY CHAIN CODE OF BUSINESS

We require all of our directors, officers and employees and those working on our behalf to comply with the law and to act ethically and with integrity at all times. We have the same requirements of our supply chain and aim to only work with companies who understand and share our commitment to the principles we set out below. Working together we can build a sustainable business relationship that enables us all to succeed, based on our shared commitment to the clear principles and minimum standards contained within our Supply Chain Code.

AXIOM partner companies are signatory of the UN Global Compact (www.unglobalcompact.org) and adheres to its 10 principles in the areas of anti-corruption, environment, human rights and labour. We expect our supply chain to adhere to the same principles and in turn encourage their own suppliers to do the same.

Health, safety, security and environment
(HSSE)

AXIOM's commitment to sustainability includes efficient use of resources, respect for the environment and safe and healthy workplaces.

Supply chain partners:

- Must comply with all applicable HSSE laws and regulations as well as industry requirements.
- Must manage their operations to minimise negative impact to the environment and community.
- Must provide a safe and healthy work environment for their employees, including training, adequate and appropriate work procedures and provision of personal protective equipment.
- Must provide a workplace that has suitable temperature, ventilation, lighting, washing and sanitation areas appropriate for both genders.
- Where accommodation / housing is provided they must be safe, sanitary and meet the basic needs of workers including with regard to space, temperature, lighting, ventilation, food, water, privacy, affordability, and they must meet host country housing standards.
- Must establish and maintain a management system or programme that encourages continual improvement in HSSE performance.

Ethics and legal requirements

AXIOM conducts its business ethically and in accordance with the law and requires its supply chain companies to conduct their business in the same way.

Supply chain partners must:

- Disclose in advance any relationship with an AXIOM director, officer or employee or person working with AXIOM that represents or might appear to represent a conflict of interest.

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- Comply with all applicable anti-trust, competition laws, and anti-corruption laws including the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act and similar laws and have in place adequate policies and procedures designed to effectively prevent bribery and corruption. The highest standards of integrity are expected in all interactions.
- Keep complete, accurate and reliable records of all matters related to their business with AXIOM and provide copies of relevant records on request.
- Protect AXIOM's confidential information and take all reasonable steps to prevent its disclosure, loss, theft, damage or unauthorised use.

Supply chain companies partners must not:

- Develop any relationship with an AXIOM director, officer or employee or those working for AXIOM, whether financial or otherwise, which might conflict, or appear to conflict, with such person's obligation to act in the best interests of AXIOM.
- Engage or allow others to engage in any form of bribery, including the small payments often known as "facilitation payments" intended to improperly influence someone.
- Offer any incentive to any AXIOM director, officer or employee or such person's family or friends in order to obtain, retain or influence AXIOM business.

Human rights and labour standards

We expect AXIOM's supply chain to demonstrate their commitment to human rights by respecting the rights and dignity of all their employees and those of their suppliers and to treat them fairly

Supply chain partners must:

Comply with all applicable labour laws.

- Set working hours, wages and overtime pay in compliance with all applicable laws. Workers should be paid at least the minimum legal wage or a wage that meets local industry standards, whatever is greater.
- Ensure all workers are provided with recruitment agreements and employment contracts in writing as required by applicable laws, in a language understood by them.
- Ensure the work relationship between their workers and their suppliers is freely chosen and free from threats and that all workers are free to have time off, or to leave their employment or work after giving reasonable notice in compliance with all applicable laws.
- Comply with all applicable laws on harassment and abuse of employees.
- Employ workers on the basis of their ability to do the job, not on the basis of their personal characteristics or beliefs (including race, colour, gender, ethnicity, nationality, religion, sexual orientation, age, disability, maternity or marital status).

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- Respect freedom of association and the right to collective bargaining. Where the right to freedom of association and collective bargaining is restricted under law, the employer must not hinder the development of parallel means for independent and free association and bargaining.
- Have adequate policies and reliable systems to prevent the use of illegally or unethically sourced materials, in particular policies and systems to prevent improper procurement of “conflict minerals” also known as tantalum, tin, tungsten and gold. Supply chain partners must only use sources that have been verified as conflict free, and provide supporting data on its supply chain for those materials to AXIOM promptly when requested.
- Use recruiters that uphold and respect the standards contained in this Supply Chain Code and reflect best practices for recruiting in respect of human rights and labour standards.

Supply chain partners must not:

- Use any forced, bonded, involuntary prison or child labour.
- Subject their employees to psychological, verbal, sexual, or physical harassment or any other form of abuse.
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose or misrepresenting key terms and conditions of employment, including wages and benefits, the location of work, the living conditions, housing and associated costs, and any significant cost to be charged to the employees, and, if applicable, the hazardous nature of the work.
- Use recruiters that do not comply with local labour laws.
- Charge employees recruitment fees.
- Retain workers’ identification documentation.
- Use temporary labour arrangements solely for the purpose of avoiding obligations to workers under labour or social security laws and regulations arising from the regular employment relationship.