



 Alludo

Supplier Code of Conduct

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Introduction to our Values



Alludo is committed to developing a business and culture that supports and respects global human rights, good governance, environmentally sustainable practices, and ethical business conduct.

Just as we have standards around legal and ethical practices for ourselves, we expect the same commitment from our suppliers, distributors, and resellers (“Suppliers”). This Code of Conduct establishes what is expected of all of our Suppliers, specifically regarding compliance, ethics, human rights, and environmental protection. We believe this commitment is essential in building and developing trusting and meaningful business relationships.

In addition to this Code of Conduct, Suppliers are expected to comply with all applicable national and international laws and regulations.

We expect our Suppliers to have the necessary policies, processes, and monitoring systems in place to comply with this Code of Conduct.

Respecting Human Rights



Alludo's Suppliers must protect and actively promote internationally recognized human rights and use best efforts to ensure that these rights are not violated along the Supplier's supply chain.

The following responsibilities are expected of Suppliers:

- To only employ persons who have reached the minimum age required to perform work in accordance with the applicable legislation.
- To ensure all work performed on its behalf is free from forced or compulsory labor as well as from any form of slavery. All work must be voluntary and without threat of punishment or physical, psychological, sexual or verbal violence and / or abuse or economic exploitation, including any forms of modern slavery or human trafficking, as well as unethical recruitment practices.
- To ensure a fair remuneration for regular working hours and overtime as well as benefits at least equal to the minimum wage established under the applicable law.
- To support diversity and inclusion and ensure that any employment relationship is free from discrimination or harassment.
- To provide workers with an environment where they are respected, safe, and secure.

Anti-Bribery, Anti-Corruption, and Conflicts of Interest

All Alludo Suppliers must comply with applicable laws and regulations concerning anti-bribery and anti-corruption, including those concerning foreign corrupt practices. Suppliers must neither engage in nor tolerate any form of corruption, bribery, theft, embezzlement, or extortion.

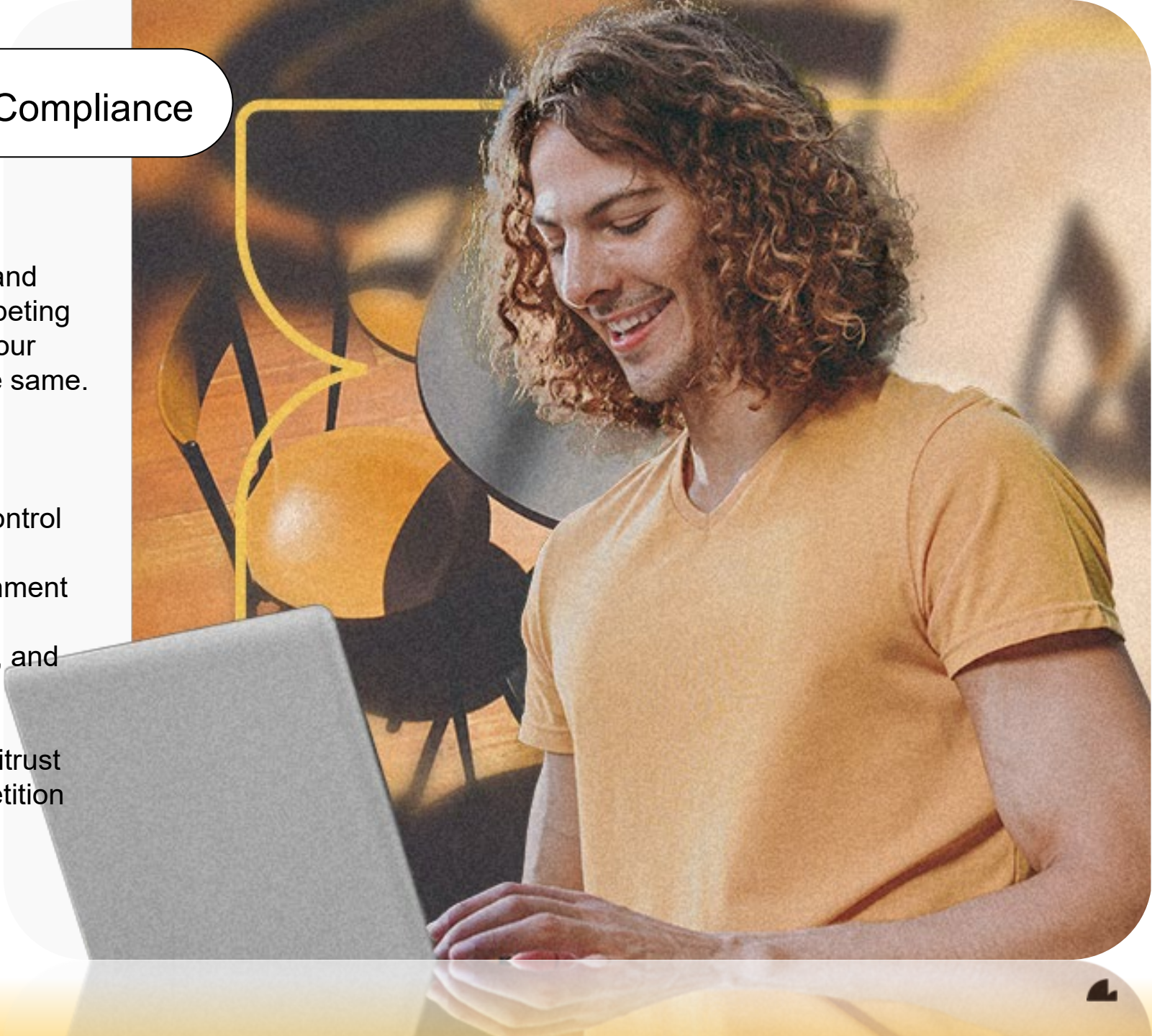
All Suppliers are expected to:

- Refrain from the use of illegal kickbacks, benefits, or payments, including without limitation, any payment or other benefit conferred on any individual, company, or government official for the purpose of influencing the decision-making process in violation of applicable laws.
- Only offer gifts and entertainment if such gift or entertainment is reasonable and customary under the circumstances, is offered for a legitimate business purpose, and does not create an appearance of impropriety.
- Disclose any relationships, associations, or activities that could create actual, potential, or even perceived, conflicts of interest. If Supplier or its employees are engaged in an activity or relationship that may interfere with Supplier's ability to adhere to these requirements, you must promptly notify us.

With operations in numerous countries worldwide, Alludo is committed to complying with and respecting global trade laws. We succeed by competing vigorously with other businesses on the quality of our products. We fully expect that our Suppliers do the same.

Suppliers are required to:

- Comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the international transmission or shipment of goods, technology, and payments.
- Conduct business in line with all applicable antitrust laws, trade practice laws, and any other competition laws, rules, and regulations.





Suppliers must ensure that confidential information or personal data provided by Alludo and others on behalf of Alludo is used solely as explicitly permitted and in accordance with applicable laws and regulations.

We require our Suppliers to:

- Adopt and maintain stringent policies and regularly train employees accordingly.
- Ensure Supplier employees store all personal identifying information securely, mark it as confidential, and store it only for as long as it is needed for the purpose for which it was collected.
- Limit access to Alludo data to only those working for the Supplier with a clear business need for the information.
- Report any suspected or actual breaches of privacy or data, including the loss, theft of or unauthorized access to personal information, to Alludo without delay.
- Cooperate with Alludo to mitigate any harm or losses in the event of a security breach or unauthorized disclosure of private information.
- Maintain a security infrastructure and appropriate safeguards that maximizes security and minimizes the potential for any breach of personal information.

At Alludo we have made commitments relating to our impact on the planet and these commitments extend to our supply chain and Suppliers. We require our Suppliers to work with us to support our goals.

Suppliers are expected to:

- Ensure compliance with all applicable environmental laws, regulations, and legal standards.
- Make practical efforts to minimize the use of energy, water, and raw materials where possible.
- Minimise usage of hazardous substances as well as the consumption of scarce resources.
- Cooperate with any requests from Alludo to disclose their environmental data, if applicable.

Questions?

To discuss this Supplier Code of
Conduct, please reach out to:
compliance@alludo.com

