

Last Updated March 12, 2025

Supplier Code of Conduct



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INTRODUCTION

Why have a Supplier Code of Conduct?

Salas O'Brien is an employee-owned engineering and technical services firm committed to achieving sustainability across our operations, including sourcing and procurement services. Suppliers are integral to our operations.

Salas O'Brien seeks to develop a long-term business relationship with its suppliers, who should have a natural respect for our ethical standards in the context of their own particular culture.

The Salas O'Brien Supplier Code of Conduct outlines the minimum requirements regarding fair business practices and ethics, labor practices, cyber security and data privacy, environmental impact, and health and safety performance. Our Supplier Code of Conduct details how we expect our suppliers to conduct their respective business operations and aspire to specific sustainability standards.

SUPPLIER EXPECTATIONS

Salas O'Brien suppliers will uphold the highest standards of fair business practices and ethics, including:

1. Legal aspects and intellectual property rights

Salas O'Brien suppliers confirm they will always comply with all local legal requirements. The intellectual property rights of third parties will be respected by all concerned.

Salas O'Brien suppliers confirm compliance with all applicable policies and procedures regarding ethical business practices. They will demonstrate a commitment to policies and practices intended to prevent unethical behavior.

2. Employment conditions

Salas O'Brien suppliers confirm that they support the [United Nations Universal Declaration of Human Rights](#), the conventions and recommendations of its [International Labor Organization](#), and the [UN global compact](#). Under no circumstances can Salas O'Brien tolerate:

- ▶ Child labor. Employees must meet the minimum age for employment.
- ▶ Exploitation of any vulnerable individual or group.
- ▶ Slavery, forced labor, or labor that involves physical or mental abuse or any form of mental or corporal punishment.



Wages and benefits must fully comply with local norms and laws and with the general principle of fair and honest dealings. Suppliers must ensure that all manufacturing processes are carried out under conditions with proper and adequate regard for the health and safety of those involved.

Salas O'Brien suppliers confirm they will implement all necessary and reasonable policies to ensure adequate working hours, compensation, the right to association, and freely chosen employment.

3. Anti-corruption

Salas O'Brien suppliers confirm to strictly comply with applicable laws prohibiting the bribery of public officials and private persons, influence peddling, and money laundering that may, in particular, entail a public contract debarment, including:

- ▲ French anti-corruption law
- ▲ The 1977 Foreign Corrupt Practices Act of the United States
- ▲ The Canadian Corruption of Foreign Public Officials Act
- ▲ The 2010 UK Bribery Act
- ▲ The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of December 17, 1997

Salas O'Brien suppliers commit to implementing all necessary and reasonable policies and measures to prevent corruption.

Salas O'Brien suppliers declare that, to their knowledge, none of their company's legal representatives, directors, employees, agents, or anyone performing services for or on behalf of Salas O'Brien engage in corrupt practices. This includes the direct or indirect offering, giving, agreeing to give, authorizing, soliciting, or accepting money or anything else of value in exchange for unethical or illegal favors.

Suppliers also confirm that they will not grant any advantage or gift to any person, company, or undertaking whatsoever, including government officials or employees, political party officials, candidates for political office, or individuals in legislative, administrative, or judicial positions. This includes public agency employees, officials of state-owned companies, and officials of public international organizations.

These commitments aim to ensure that no person is corruptly influenced in their official capacity. Additionally, these actions must not serve to reward or induce the improper performance of any relevant function or activity. All efforts are made to ensure that Salas O'Brien does not obtain or retain business through improper means or gain an unfair advantage.



Salas O'Brien suppliers confirm that no legal representatives, directors, employees, agents, sub-contractors, or anyone performing services for or on behalf of Salas O'Brien have been listed by any government agency as debarred or suspended, including anyone performing services for or on behalf of Salas O'Brien.

Suppliers further confirm that no one is proposed for suspension or debarment or deemed ineligible for participation in government procurement programs. This applies to bidding processes advertised by the World Bank or any other international development bank.

4. Non-discrimination

Salas O'Brien suppliers must commit to a workforce and workplace free of harassment, unlawful discrimination, and retaliation. Suppliers should ensure their business practices respect the rights of different demographic groups, including women and migrant workers. While we recognize and respect cultural differences, suppliers must provide equal opportunity in the workplace and reasonable accommodation and not engage in harassment or discrimination in employment on the basis of age, ancestry, citizenship, color, family or medical care leave, gender identity or expression, genetic information, immigration status, marital or family status, medical condition, national origin, physical or mental disability, political affiliation, union membership, protected veteran status, race, religion, sex (including pregnancy), sexual orientation, or any other characteristic protected by applicable local laws, regulations, and ordinances.

5. Health and Safety

Salas O'Brien seeks to collaborate with suppliers that provide employees with a safe and healthy workplace. Any Salas O'Brien supplier and its employees are committed to operating safely and working towards a goal of zero incidents. Salas O'Brien suppliers must provide employees with all necessary training and personal protection.

Suppliers are responsible for developing, maintaining, and implementing health and safety programs, policies, procedures, and equipment as necessary to protect their workers and others from their activities. Suppliers shall operate equipment according to their standard operating procedures and manufacturer specifications. Any project monitoring activities conducted by Salas O'Brien at a facility or property shall not in any way relieve suppliers of their critical obligation to monitor their operations and employees for the determination of exposure to hazards that may be present at a location and to provide required guidance and protection. If requested, suppliers will provide Salas O'Brien with a copy of their health and safety plan for a project or other health and safety program documents for review.



The supplier shall remain responsible for identifying and evaluating hazards at a work location as they pertain to their activities and for taking appropriate precautions. Salas O'Brien suppliers confirm compliance with international industry and safety standards, as applicable.

6. Environmental aspects

The realization of environmental standards is a complex issue. Salas O'Brien expects its suppliers to comply with all applicable environmental regulations and legislation. Salas O'Brien suppliers are committed to developing cleaner processes and aim to minimize the environmental impact and follow best practices in environmental management, including energy and resource efficiency, limitation of CO2 emissions and other greenhouse gases, responsible water management, waste treatment and reduction, and recycling.

Salas O'Brien suppliers comply with setting an environmental policy that accounts for product and material use and transportation technology. As applicable, Salas O'Brien suppliers confirm to follow ISO 14000 standards and guidelines regarding environmental management systems, ecolabeling, environmental auditing, environmental performance evaluation, environmental aspects in product standards, and life cycle assessments.

7. Freedom of association

Salas O'Brien recognizes and respects the freedom of employees to choose whether to associate with any group of their choosing, as long as such groups are legal in their own country. Suppliers must not prevent or obstruct such legitimate activities.

8. Economic sanction regulations

Salas O'Brien suppliers and their subcontractors confirm compliance with applicable global trade laws, including:

- ▶ The U.S. Export Administration Regulations (EAR) administered by the U.S. Commerce Department's Bureau of Industry and Security (BIS)
- ▶ The U.S. International Traffic in Arms Regulations (ITAR) administered by the U.S. State Department's Directorate of Defense Trade Controls (DDTC)
- ▶ The economic sanctions rules and regulations administered by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC)
- ▶ The Canadian Special Economic Measures Act



- ▶ European Union (EU) regulations on export controls and sanctions
- ▶ United Nations (UN) sanctions policies
- ▶ All relevant regulations made under any of the foregoing, and other applicable economic sanctions, export control, or import laws.

If the Salas O'Brien supplier deals in controlled products, technology, services, or information, directly or indirectly, it will first obtain all necessary written consents, permits, and authorizations and complete such formalities as required by any applicable global trade laws.

9. Community development

Salas O'Brien recognizes the value of the communities in which we do business. Salas O'Brien suppliers and their subcontractors confirm that they will have a positive impact on the communities and environments in which they operate.

10. Data protection

Salas O'Brien is committed to protecting corporate data in compliance with applicable laws. Salas O'Brien expects that our suppliers, their employees, contractors, and any third parties who handle corporate data on behalf of Salas O'Brien uphold these standards to ensure the privacy and security of all data handled.

Salas O'Brien suppliers and their subcontractor confirm that they will:

- ▶ Process corporate data lawfully, fairly, and transparently.
- ▶ Collect data only for specified, legitimate purposes.
- ▶ Limit data collection to what is necessary, ensure data is accurate and kept up to date, and retain data only as long as required for its intended purpose.
- ▶ Secure data against unauthorized access and breaches. If such data breaches occur, the supplier shall provide prompt notification to privacy@salasobrien.com within 12 hours of the breach.
- ▶ Implement data protection measures from the outset of any project and ensure privacy settings are set to the highest level by default.
- ▶ Designate a Data Protection Officer, if applicable, to oversee compliance, ensure resources are allocated for data protection, and employees are trained on these principles.



Salas O'Brien data privacy suppliers confirm that they will process personal data to ensure appropriate security and confidentiality and conduct data privacy impact assessments for any new or significantly changed processing activities.