



EAGLE

Sports Integrity Services

Suppliers Code of Conduct

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Introduction of Suppliers Code

EAGLE Sports Integrity Services is dedicated to building a better world through sports.

EAGLE adheres to a responsible sourcing approach, ensuring that our procurement of products and services considers environmental, social, and ethical issues. This Supplier Code outlines the minimum requirements expected from any third party providing or intending to provide goods and services to EAGLE Sports Integrity Services.

Compliance with this Supplier Code is mandatory for all procurement or licensing contracts between EAGLE Sports Integrity Services and its suppliers for contracts signed after the Code comes into effect. EAGLE Sports Integrity Services also expects its suppliers to ensure these requirements are upheld by their own suppliers and subcontractors. As the business relationship progresses, EAGLE Sports Integrity Services expects suppliers to continuously enhance their environmental and social performance.

The following sections detail the standards EAGLE Sports Integrity Services expects its suppliers to adhere to and the processes they should implement. These requirements reflect EAGLE Sports Integrity Services' commitment to promoting compliance with internationally agreed standards, including the UN Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.

Human Rights

Suppliers shall respect internationally proclaimed human rights and ensure that they are not complicit in human rights abuses. They shall ensure that any violation of human rights is remedied in a manner consistent with international agreements, applicable laws, and regulations, including the [UN Guiding Principles on Business and Human Rights](#).

Labor Standards

Forced Labor

- All work must be conducted on a voluntary basis and not under threat of any penalty or sanctions.
- The use of forced or compulsory labor in all its forms, including prison labor when not in accordance with ILO Convention 29 (Forced Labor), is prohibited.
- Suppliers shall not require workers to make deposits or financial guarantees and shall not retain identity documents (such as passports, identity cards, etc.), nor withhold wages.
- Bonded labor is prohibited. Suppliers shall not use any form of bonded labor, nor permit or encourage workers to incur debt through recruitment fees, fines, or other means.
- Indentured labor is prohibited. Suppliers shall respect the right of workers to terminate their employment after reasonable notice. Suppliers shall respect the right of workers to leave the workplace after their shift.
- In the case of agency or indirectly employed workers, suppliers shall ensure that such workers do not pay any form of recruitment fees to any agents to gain employment.

Child Labor

Suppliers shall comply with:

- The national minimum age for employment.
- The age of completion of compulsory education.
- Any otherwise specified exceptions regarding child labor.
- They shall not employ any person under the age of 15, whichever of the above options is higher. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.
- Suppliers shall not recruit child labor nor exploit children in any way. If children are found to be working directly or indirectly for the supplier, the latter shall seek a sensitive and satisfactory solution that puts the best interests of the child first.
- Suppliers shall not employ young workers under 18 years of age at night or in conditions that might compromise their health, safety, or moral integrity, and/or that harm their physical, mental, spiritual, moral, or social development.
- Suppliers shall educate and inform their employees about child protection laws.

Freedom of Association and Effective Recognition of the Right to Collective Bargaining

- Workers have the right to join or form trade unions of their choice and to engage in collective bargaining without needing prior authorization from the suppliers' management. Suppliers must not interfere with, obstruct, or prevent these legitimate activities.
- In cases where the law restricts or prohibits the right to freedom of association and collective bargaining, suppliers must not hinder alternative forms of independent and free worker representation and negotiation.
- Suppliers must not discriminate against or penalize worker representatives or trade union members due to their membership in or affiliation with a trade union or for engaging in legitimate trade union activities.
- Suppliers must allow worker representatives access to the workplace so they can perform their representative duties.
- Suppliers must encourage worker representatives to regularly provide feedback and suggestions regarding the working conditions of the employees.

Discrimination, Harassment and Abuse

- Suppliers must take appropriate steps to create a culture that recognizes, respects, values, and embraces differences for the benefit of everyone.
- Suppliers must ensure equal opportunities in recruitment, compensation, access to training, promotion, termination, and retirement.
- Suppliers must not engage in, support, or tolerate discrimination in employment, including recruitment, hiring, training, working conditions, job assignments, pay, benefits, promotions, discipline, termination, or retirement based on gender, age, religion, marital status, race, caste, social background, diseases, disability, pregnancy, ethnic and national origin, nationality, membership in worker organizations including unions, political affiliation, sexual orientation, or any other personal characteristics.
- Suppliers must treat all workers with respect and dignity, basing all terms and conditions of employment on an individual's ability to do the job, not on personal characteristics or beliefs.
- Suppliers must not engage in or tolerate bullying, harassment, abuse, or any other forms of intimidation.
- Suppliers are required to conduct educational and informational sessions on employee rights and inclusion policies.
- Suppliers must establish written disciplinary procedures and explain them clearly and understandably to their workers. All disciplinary actions must be recorded.

Health and Safety

- Suppliers must ensure that all work and residential facilities (where provided) are safe and clean and must establish and adhere to clear procedures for regulating occupational health and safety.
- Suppliers must take appropriate measures to prevent workplace accidents and health injuries by minimizing, as much as reasonably possible, the inherent hazards in the working environment.
- Suppliers must provide suitable and effective personal protective equipment as needed and train workers in its proper use and maintenance.
- Suppliers must provide access to adequate medical assistance and facilities.
- Suppliers must ensure that all workers have access to clean toilet facilities and drinkable water, and, if applicable, sanitary facilities for food preparation and storage.
- Suppliers must assign a senior management representative the responsibility for health and safety.
- Suppliers must provide regular and documented health and safety training to both workers and management, and this training must be repeated for all new or reassigned workers and management.
- Suppliers must implement adequate fire safety measures, including providing an adequate number of unblocked escape routes and exits, and ensure the strength, stability, and safety of buildings and equipment, including residential facilities where provided.
- Accommodation, where provided, must be separate from production facilities, located only in buildings designed for worker accommodation, and must offer individual privacy and secure storage for personal belongings.

Wages, Benefits and Terms of Employment

- Work performed must be based on a recognized employment relationship established in compliance with national legislation and practice and international labor standards, whichever affords greater protection.
- Labor-only contracting, subcontracting, home-working arrangements, and apprenticeship schemes without the genuine intention to impart skills or provide regular employment, as well as the excessive use of fixed-term employment contracts or similar arrangements, shall not be used to circumvent obligations to workers under labor or social security laws and regulations arising from regular employment relationships.
- Suppliers must compensate their workers with wages, overtime pay, benefits, and paid leave that meet or exceed legal minimum standards, industry

benchmarks, or collective agreements, whichever is higher. Wages and compensation for regular working hours should meet basic needs and provide some discretionary income for workers and their families.

- Suppliers must provide all workers with written and comprehensible information about their employment conditions, including wages, before they start employment. They must also provide details of wages for each pay period whenever workers are paid.
- Suppliers shall not make any deductions from wages that are unauthorized or not provided for by national law. Wage deductions shall not be used as a disciplinary measure.
- Suppliers must provide all legally required benefits, including paid leave, maternity leave provisions, and support for childcare where appropriate.
- Suppliers must compensate all workers for all overtime work at a premium rate, as required by law and, where applicable, by contractual agreement.

Working Hours

- Suppliers must establish working hours that comply with national laws, benchmark industry standards, or relevant international standards, whichever provides greater protection, to ensure the health, safety, and welfare of workers.
- Workers must be given at least one day off in every seven-day period or, where permitted by national law, two days off in every 14-day period, in addition to public and annual holidays.

Optimization of Travel and Freight

- For the delivery of goods or services, suppliers should aim to minimize transport distances and optimize transport efficiency, favoring low- or zero-emission transport modes.
- If vehicles are used, preference should be given to electric or hybrid vehicles, or low fuel-consumption vehicles (e.g., labels A or B under the EU labeling scheme) that meet EURO 6 emission standards.
- For long-distance freight, suppliers should prefer transport by train or boat over air transport.

Anti-Bribery and Corruption

- Suppliers must always comply with all applicable laws and regulations related to their activities and the provision of services, including all relevant anti-bribery and anti-corruption laws, some of which may have extraterritorial reach. They must also respect the principles outlined in the [UN Guiding Principles on Business and Human Rights](#).
- Suppliers must not, directly or through a third party, promise, offer, make, authorize, solicit, or accept any financial or other advantage to or from anyone to obtain or retain business or secure an improper advantage in business conduct. This rule applies whether such third parties are government officials or private sector employees. A financial or other advantage includes anything of value, such as cash, gifts, services, job offers, loans, travel expenses, entertainment, or hospitality. All facilitation payments, which are unofficial, improper, small payments or gifts made to secure or expedite a routine or necessary action to which the supplier is legally entitled, are prohibited as they are considered bribes.

Digital Safety

- Suppliers should utilize specific techniques when using software and hardware devices, ensuring responsible behavior in online environments.
- Suppliers must use strong passwords. They should create complex passwords using a mix of letters, numbers, and special characters. Avoid easily guessable information like birthdays or common words. Change passwords regularly and avoid reusing them across different accounts.
- Suppliers are required to implement Two-Factor Authentication (2FA). They should enable 2FA to enhance security and utilize authentication apps or SMS codes for identity verification.
- Suppliers must ensure that their software remains current with the latest updates and that all necessary security patches are promptly applied.
- Suppliers are required to utilize secure networks, including refraining from using public Wi-Fi for sensitive transactions and employing a VPN to encrypt internet connections, particularly when accessing public networks.
- Suppliers are required to secure their devices by using and keeping antivirus software updated, enabling firewalls on computers and networks, and locking devices with a PIN, password, or biometric security when they are not in use.
- Suppliers must routinely back up data to an external drive or cloud service, ensuring that backups are secure and readily restorable when necessary.
- Suppliers are required to offer digital literacy training to their employees and continually educate them on emerging trends in digital safety.

- Suppliers must navigate the digital world with a commitment to respecting diverse viewpoints and opinions encountered online. This involves being tolerant of differing beliefs and perspectives, maintaining polite and constructive communication in all online interactions, and refraining from using inflammatory or offensive language that could potentially harm or provoke others.
- Suppliers are encouraged not to propagate undefined rumors. It's important to verify the accuracy and credibility of information before accepting and sharing it, as misinformation and rumors can rapidly spread online, potentially impacting individuals and communities adversely.
- Suppliers should honor the privacy of others by refraining from sharing personal information without consent.
- Suppliers should adhere to copyright laws and give appropriate credit to the original creators when using or sharing content such as images, videos, or written material.
- Suppliers are encouraged to refrain from participating in or endorsing cyberbullying behaviors. Instead, they should contribute to fostering a positive online environment by reporting instances of harassment or bullying to the appropriate platforms or authorities.

Complying with The Supplier Code

The requirements set out in this Code constitute minimum and not maximum standards. Suppliers are expected to comply with applicable laws and regulations related to anti-bribery and corruption, and environmental and social responsibility. Where regulatory provisions are more stringent, suppliers shall apply the more stringent provisions.

Transparency

Suppliers must obtain prior agreement from EAGLE Sports Integrity Services regarding the organizations and production site(s) to be used. Subcontracting of any kind (e.g., organizations, sites, or units) is not allowed without written pre-authorization from EAGLE Sports Integrity Services.

Workplace Complaints Mechanism

Suppliers shall provide a mechanism for their employees and workers in their supply chain to raise workplace issues and concerns without fear of retribution. This mechanism should involve an appropriate level of management and seek to address concerns promptly and transparently. Arrangements must allow for issues and concerns to be raised and addressed anonymously and be clearly communicated to all workers and their representatives. A good example of a monitoring process includes a speak-up line and an application for anonymous feedback from workers and suppliers.

EAGLE Sports Integrity Services will monitor its suppliers' adherence to its requirements through various methods, including reviewing documented evidence or independent specialist audits if deemed relevant. Any violations may jeopardize the supplier's business relationship with EAGLE Sports Integrity Services and may lead to the termination of the contract or cooperation. EAGLE Sports Integrity Services reserves the right to take any further legal action at its discretion.

Sign

I hereby confirm that we accept and will comply with the EAGLE Sports Integrity Services Supplier Code.

Supplier name

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Signature

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Date

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Signatory name and function

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