

SUSTAINABLE PROCUREMENT POLICY

Five fundamental principles guide the ITC Group team and how we treat each other, our clients, suppliers, and the general public. Wherever in the world, these deeply anchored values show up in our daily work and form the basis of all our relationships and our decisions.

- **Connection:** Create and maintain relationships with you, promote team spirit and collaboration.
- **Respect:** Demonstrate respect through cordial, constructive discussions. Show kindness.
- **Freedom:** Be free to get creative in order to support your most innovative projects.
- **Simplicity:** Be humble, facilitate discussions and communications.
- **Loyalty:** Honor our commitments, demonstrate honesty and transparency.

At ITC, we are always driven by these “Five fundamental” values – our unwavering commitment to always do the **right thing for our clients, our people, our suppliers, and our communities**. We are committed towards social impact and strive for sustainability across every function, **including sourcing and procurement**.

Through this procurement policy, we intend to make our operations more sustainable by:

- Upholding the laws and regulations of the respective countries we operate in
- Endorsing highest standards of economic, social, ethical, and environmental practices
- Identifying and moderating risks associated with our procurement process
- Communicating the policy with stakeholders (internal and external) and raising awareness among our suppliers

In accordance with our commitment to the highest standards, we also expect our suppliers to aspire to the same standards in their business operations, including but not limited to:

Employees

- Comply and adhere to all the applicable environmental laws in respective countries/jurisdiction
- Undertake initiatives to promote greater environmental responsibility such as:
 - Responsible waste management and disposal
 - Reduction of greenhouse gas and other emissions harmful to the environment
 - Conservation of non-renewable natural resources

Business Ethics

- Obey all relevant international and domestic laws regarding ethical business practices
- Demonstrate existence of procedures to prevent:
 - Money laundering
 - Fraud, bribery, corruption
 - Conflicts of interest
 - Data security issues

Labor and Human Rights

- Comply with all applicable laws, in accordance with the principles of the International Labor Organization, the UN Global Compact and the UN Universal Declaration of Human Rights
- Prohibit slavery and the use of forced, bonded, or child labor across the supply chain
- Prohibit unlawful discrimination and harassment to provide a safe and inclusive work environment

Community Development

- Provide employees with a living wage, at a minimum
- Partner with the local governments and communities to improve the education, cultural, economic, and social well-being of communities which they operate in

We understand that procurement performance improvement is a continuous process and recognize the contribution of our suppliers in our journey to become more sustainable.

For detailed guidelines on supplier sustainability, please refer to our Supplier Code of Conduct at: <https://www.itcglobaltranslations.com/corporate-social-responsability/>

For any grievances or suggestions regarding sustainable procurement practices, please write to compliance@itcglobaltranslations.com. Strict confidentiality will be maintained.

REVISIONS AND VALIDATION

Document Revisions

No.	Document Version	Revision Description	Revision Date	Reviser
1	V1	Creation of ITC sustainable procurement policy	10/12/2022	M.Lavarenne
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Document Validation

This document and its version number have been logged in the ITC Document Tracking file. It has been signed off and validated by the ITC HR Manager.

Date: 10/12/2022

Name: M. Lavarenne

Signature: 