

## **SUPPLIER CODE OF CONDUCT**

### **Introduction**

ITC Group (referring to ITC Translations USA, Inc., SAS International Traduction Conseil – ITC, and ITC Traductions Canada Inc.) is committed to the highest standards of ethics, integrity, and compliance.

ITC Group has adopted the following Code of Conduct (the “Code”) for all suppliers, contractors, and vendors (collectively “Suppliers” or individually “Supplier”) that are engaged to provide services to ITC Group (the “Services”).

ITC Group expects its Suppliers to cascade this Code down to their own suppliers, contractors, and vendors that are either connected to the Services or have access to ITC Group’s or its clients’ confidential information or personal data.

By its acceptance of any agreement to provide services to ITC Group or by providing services to ITC Group, the Supplier acknowledges and accepts this Code and agrees to comply with these requirements:

### **1. Compliance with Laws and Regulations**

Suppliers must comply with applicable laws and regulations within the geographies where they operate (including, but not limited, to employment and discrimination laws, child labor laws, health and safety laws, human rights laws, antitrust laws, export and trade control laws, environmental laws, and others referenced below) and be open and cooperative with the regulators enforcing such laws. In instances where expectations outlined in the Code differ from local laws or regulations, ITC Group expects its Suppliers to comply with the more stringent laws or policies.

### **2. Anti-Bribery and Anti-Corruption**

Suppliers must fully comply with the requirements of all applicable anti-bribery and anti-corruption laws (e.g. the UK Anti Bribery Act, The US Foreign Corrupt Practices Act, and any other applicable laws) and enact adequate policies and procedures to ensure compliance with these laws. Supplier must not offer or accept any gift to gain an improper influence or business advantage. Gifts include anything of value (e.g. a benefit, fees, commissions, cash, services, or inducements).

### **3. Conflict of Interest**

Suppliers must avoid any engagement or activity with ITC Group or its employees that may conflict or appear to conflict with the best interests of ITC Group. Suppliers that are aware of a conflict of interest or concerned that a conflict might develop are required to notify ITC Group.

#### **4. Respectful Workplace**

ITC Group is committed to maintaining a workplace in which all individuals and applicants are treated with respect, dignity, and equal opportunity. ITC Group expects its Suppliers to do the same.

ITC Group prohibits harassment or discrimination based on race, color, religion, gender identity, national origin, sexual orientation, age, or any factor prohibited by applicable law. ITC Group expects its Suppliers to do the same for their employees, contractors, and applicants.

#### **5. Modern Slavery**

ITC Group does not tolerate slavery, forced labor, or human trafficking in any form. Suppliers must fully comply with all applicable slavery, forced labor, and human trafficking laws, and enact adequate policies and procedures to ensure compliance with such laws.

#### **6. Confidentiality**

Suppliers must protect personal data disclosed during the Services and ITC Group's and its clients' confidential information. Suppliers must design, implement, and maintain sufficient policies, processes, and procedures to protect this information.

#### **7. Personal Data and Privacy**

Suppliers must comply with all applicable data protection and privacy laws. In providing the Services, ITC Group may directly or indirectly disclose personal data to Suppliers (the "Personal Data").

Suppliers must:

- collect, use, process, store, transfer, and disclose Personal Data only as permitted in the agreement with ITC Group,
- retain Personal Data only as long as is reasonably necessary to satisfy the purpose for which it was disclosed or as long as legally required,
- obtain enough insurance (from a reputable insurance carrier) to cover any violation of applicable data protection and privacy laws, and
- implement technical, administrative, and physical safeguards that are consistent with industry best practices to protect Personal Data from theft, fraud, improper access disclosure, and misuse. In the event of any unauthorized access or disclosure of Personal Data, Suppliers must promptly notify ITC Group.

#### **8. Environmental Sustainability**

ITC Group recognizes the importance of protecting the natural environment and our shared responsibility in addressing these critical environmental issues facing the planet. Suppliers are encouraged to notify ITC Group about products or services that might help ITC Group reduce its environmental impact. ITC Group reserves the right to request information from its Suppliers regarding their own environmental practices.

**Compliance with this Code**

Violations

Suppliers are required to promptly report violations of this Code or other ITC Group policies to [compliance@itcglobaltranslations.com](mailto:compliance@itcglobaltranslations.com).

ITC Group’s Rights

In the event of non-compliance with or violations of this Code, ITC Group may give the Supplier a reasonable opportunity to respond with proposed corrective actions, unless the violation is severe, incurable, or there is a violation of law. In such cases, ITC Group reserves the right to suspend or terminate its relationship with a Supplier and/or disclose the matter to the appropriate authorities if there is a violation of law.

Order of Precedence and Revisions to the Code

This Code does not supersede any applicable law or provision of any agreement between ITC Group and Supplier. ITC Group reserves the right to update or revise this Code upon notice to Supplier.

**REVISIONS AND VALIDATION**

**Document Revisions**

No.	Document Version	Revision Description	Revision Date	Reviser
1	V1	Creation of ITC supplier code of conduct	10/12/2022	M.Lavarenne
2				
3				
4				
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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: 