

CODE OF ETHICS FOR THIRD PARTIES AND SUPPLIERS

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This Code of Ethics for Third Parties and Suppliers (henceforth called “Supplier Code”) applies to suppliers and third parties in their work with QGMI through a contractual agreement. This Supplier Code should be interpreted in conjunction with the QGMI Code of Ethics.

The group collectively referred to as “Supplier(s)” within this Supplier Code includes suppliers, subcontractors, service providers, professional service providers, consultants, intermediaries, agents and business partners.

As a Supplier to QGMI, your company and employees are critical to QGMI’s success, and for QGMI to provide superior services in a responsible manner, QGMI requires its Suppliers to comply with this Supplier Code. This Supplier Code sets forth QGMI’s fundamental ethical and business conduct requirements for Suppliers. It is not intended to be an exhaustive list of all requirements to be followed by the Supplier but is intended to be a high-level overview of such requirements.

All references in this Supplier Code to “Laws” means all applicable laws, regulations, directives, rules, decrees and governmental orders.

QGMI reserves the right to amend the requirements of this Supplier Code as a result of changes in legislation or to its Compliance Programme; following which QGMI shall communicate any such changes or expectations to the Supplier.

QGMI Suppliers acknowledge and agree to the following standards:

- ❖ **Legal Compliance:** comply with all laws of the legal system of any jurisdiction to which they are subject.
- ❖ **Prohibition of corruption and bribery:** not carry out any form of bribery or corruption in their commercial relations and, therefore, is willing to fight and prevent conflict situations and violation of the legislation and to the guidelines of conduct laid down in the Code of Ethics of QGMI. The most common form of corruption is bribery which means giving or receiving money, gift or any valuables in return of favourable treatment by Public Official or Government Authority, directly to or through intermediaries, in order to: i) influence any act or decision of the Public Official; II) induce to practice an act in violation of their legal obligations; III)

Undue Advantage; and iv) induce to use his influence with a Public Agent to help achieve, retain or speed up business.

- ❖ **Conflicts of interest:** do not perform activities that might, directly or indirectly, diverge, confront or violating the interests of QGMI, for reasons of a personal nature or third party related to an employee/supplier.
- ❖ **Gifts, Benefits e Hospitalities:** prior to send or offer gifts, benefits or hospitality to agents of the private market and public administration, when in the framework of the provision of services/supplies contracted by QGMI, observe the limits set by the QGMI Ethics Committee and, particularly in the case of representatives of the Public Administration, observe the limits allowed by the current legislation on the subject.
- ❖ **Contributions to Political Parties or Election Campaigns, Donations and Sponsorships in General:** is not allowed to perform any type of contributions to political parties or election campaigns, either donations or sponsorships in General, when in the name, interest or benefit, direct or indirect, of the QGMI.
- ❖ **Respect for worker human rights:** Supplier is responsible for respecting human rights in its operations and will comply with the standards set forth in the United Nations (UN) Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights. The standards set forth in this Supplier Code apply to all your workers, including, without limitation, temporary, migrant, student, contract, direct employees, and any other type of worker engaged by the Supplier. Where the Supplier becomes aware of an instance of child, forced, bonded or compulsory labour within its operations or supply chain, the Supplier shall cooperate with law enforcement authorities to address it. The applicable labour standards are:
 - Child labour: Supplier shall not engage in or condone the unlawful employment or exploitation of children in the workplace. Supplier shall ensure all workers are of local legal age and shall not hire workers considered to be "minors" under local legislation. Supplier shall be committed to combating the exploitation of children, and therefore prohibit any use of child labour with any vendor, supplier or other third-party arrangements.
 - Human trafficking, slavery and the right to voluntary labour: Supplier shall ensure all work done by employees according to the rules; without the use of forced or compulsory labour. Supplier shall not allow any practice that would restrict free movement of employees; such as requiring that employees hand over identification documents, passports or work permits as a condition of employment. Supplier shall not do business with, tolerate, or associate with organisations or entities that condone or are engaged in the practice of coercing or imposing work with little or no freedom of choice.

- Freedom against prejudice and discrimination: Supplier shall strive to maintain an inclusive workplace free of harassment and discrimination based on a person's status such as ethnicity, religion, nationality, gender, sexual orientation, age, disability, veteran or military status or other characteristics protected by Law. Supplier shall ensure that it has requisite policies and practices in place to foster a harassment and retaliation free environment, ensuring safe and diverse environment.
- Privacy: Supplier shall respect the privacy of employees and customers and comply with all Laws in the collection, use and protection of personal information.

- ❖ **Health and safety of workers**: To safeguard the occupational health and safety of QGMI's direct and indirect workforce, Supplier shall:
 - Comply with all health, safety and security Laws of the jurisdictions in which it does business;
 - Comply with QGMI's Integrated Management System (IMS) requirements as stipulated in its IMS Policy and IMS Manual;
 - When necessary to safely perform a job, Supplier shall provide to workers at no cost and as appropriate the proper personal protective equipment and ensure proper maintenance of the equipment;
 - Ensure employees are free to raise safety concerns without fear of retaliation in any form.

- ❖ **Environmental Protection**: QGMI is committed to protecting the environmental values of the regions where it operates and maintaining good project stewardship. Supplier shall:
 - Observe and comply with all applicable environmental Laws, including, without limitation, those which relate to (i) obtaining and maintaining required environmental permits, approvals and registrations, as well as complying with applicable operational and reporting requirements; (ii) the handling, removal, transportation and disposal of hazardous materials used by Supplier; and (iii) monitoring, controlling, treating and sanitizing air emissions, waste water and solid wastes;
 - Seek opportunities to continuously improve environmental and resource management - reduce, reuse and recycle;
 - Seek opportunities that promote the use of clean and low energy solutions.

- ❖ **Supply chain "flow-down"**: Suppliers shall ensure that their own suppliers, subcontractors and business partners undertaking activities for or on behalf of QGMI are aware of and understand the requirements set forth in this Supplier Code, and shall make best efforts to ensure their compliance with it.

- ❖ **Quality**: seek improvement of processes and business management, as well as the qualification of employees, at all levels, continuously.

- ❖ **Dissemination and Training:** Supplier shall disseminate this Code internally to its employees responsible for the provision of the services/supplies to QGMI and ensure that they understand the text and undertake to stick to it. Suppliers must also perform periodic training of its employees to ensure that the rules herein were properly understood and are being properly observed on the day to day provision of services/supplies to QGMI.

- ❖ **Communication channel:** Supplier - including its employees and supply chain – must report to QGMI suspected or known misconduct in relation to goods, services or activities rendered for or on behalf of QGMI. Suspected or known misconduct must be reported by speaking with the Supplier’s QGMI contact person, or with the management unit, subsidiary or project for which the Supplier is working. If preferred, the Supplier may report suspected or known misconduct confidentially and anonymously through the QGMI Ethics Channel, either by telephone or online, 24 hours a day 7 days a week. The Ethics Channel information is available in QGMI webpage.