



DataBank Supplier Code of Conduct

DataBank Holdings Ltd. and its affiliates (collectively "DataBank") upholds a policy of conducting business with utmost integrity and adherence to all applicable laws, rules, and regulations. DataBank relies on its employees as well as our partners, contractors, and suppliers to maintain its high ethical standards. DataBank values all contractors and suppliers who join DataBank in supporting these common goals of integrity and ethical business practices.

Scope

The DataBank Supplier Code of Conduct ("SCoC") applies to third party contractors, suppliers and their employees offering goods and/or services to DataBank ("Suppliers"). The SCoC defines DataBank's expectations for Suppliers and their employees, agents, and subcontractors when conducting business with or on behalf of DataBank.

Compliance with Applicable Laws, Rules, and Regulations

Suppliers shall conduct their business activities in full compliance with all applicable laws and regulations.

Conflicts of Interest

A conflict of interest involves conditions where a Supplier's commitments to third parties, relationships with DataBank employees, or other financial interests conflicts with DataBank's interests or may make it difficult or appear to make it difficult for Supplier to provide goods or services to DataBank objectively.

Suppliers shall disclose to the DataBank employee that they work with if Supplier has any relationships with DataBank employees, material financial interests (e.g., investments, loans, etc.), and other conditions which would create conflicts of interest in fact or in appearance.

Gifts and Entertainment

DataBank understands that usual business practices occasionally comprise the offering of meals, token gifts, prizes to employees and/or entertainment by or to current or prospective clients, vendors, and business partners in the course of pursuing the legitimate business interests. The SCoC is not meant to ban legitimate customary business practices that are designed to create goodwill and enhance business relationships. Gifts and entertainment from Suppliers to DataBank's employees must be



moderate in value, and suitable in nature. The following forms of gifts or entertainment are prohibited:

- Gifts of cash or cash equivalents (including gift cards) over \$100,
- Gifts or entertainment that might be interpreted as a bribe or a payoff,
- Gifts or entertainment intended to sway business with a person or an entity they are affiliated with,
- Gifts or entertainment that are illegal, obscene, or offensive in nature or would embarrass DataBank if made public,
- Gifts to individuals, not connected with business purposes (e.g., year-end holiday or birthday gifts).
- Merchandise, company branded items, prizes, or gifts valued at large dollars amount (>\$100).

Confidential Information and Protection of DataBank Assets

Confidential Information

In accordance with non-disclosure agreements entered into by Suppliers and DataBank, Suppliers' responsibility to protect DataBank's confidential and proprietary information continues even after the completion of their assignment or contract with DataBank.

Suppliers shall notify a DataBank authorized representative of any unauthorized use or disclosure of DataBank's confidential information. Suppliers shall protect and conserve DataBank's valuable property and resources in accordance with best industry practices and use them only for legitimate business with DataBank. Suppliers may also be subject to other information security requirements as specified in contracts between DataBank and Supplier.

Communications

Unless otherwise agreed to in writing by an authorized member of DataBank's Marketing department, Suppliers are prohibited from publishing any marketing materials, press releases or media interviews that include a reference to DataBank, our clients/customers or the work being completed together (a "Publication"). Any Publication by a Supplier should be pre-approved by the DataBank Marketing Department and all Supplier requests will be considered on a case-by-case basis.



Business Records

Suppliers shall record and report all business transactions involving DataBank honestly, completely, and accurately in accordance with all applicable laws and accounting principles and Suppliers shall provide such information to DataBank, when required or requested.

Privacy

Suppliers shall comply with all applicable data privacy laws. For more information, see DataBank's [Privacy Policy](#).

Fraud, Anti-Bribery, and Anti-Corruption

DataBank is committed to fostering a culture based on ethical behavior and values. To this end, DataBank strictly prohibits all fraudulent activities and we expect the same of our Suppliers. Fraudulent activities include theft, the misappropriation or misuse of assets for personal benefit; bribery and corruption; false accounting and/or making fraudulent statements with a view to personal gain or gain for another. Suppliers should not offer, provide, authorize or receive bribes, kickbacks or other improper payments for any reason. Suppliers should also comply with all applicable anti-bribery and corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act. Suppliers should prevent and monitor for possible money laundering, terrorist financing, or activity violating any applicable sanctions or export-based restrictions.

Suppliers should ensure they are conducting business only with reputable suppliers, for legitimate business purposes, with funds derived from legitimate sources.

Employment Practices and Human Rights

Anti-Harassment and Non-Discrimination

DataBank does not tolerate, and Suppliers shall not engage in, any form of discrimination, harassment or demeaning behavior against any individual or group on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin or ancestry, citizenship, age, marital or family status, military or veteran status, physical or mental



illness or disability, pregnancy or any other basis prohibited by applicable law. For additional information, see our [Workforce Excellence Statement](#).

Human Rights, Anti-Slavery, and Anti-Human Trafficking

DataBank is committed to a work environment that is free from human trafficking and slavery. DataBank will not and does not tolerate or condone human trafficking in any part of its organization or business relationships. Consistent with the United Nations Universal Declaration of Human Rights and the U.K. Modern Slavery Act, DataBank conducts business in a way that demonstrates its endorsement and regard for the defense and progression of human rights and expects the same of our Suppliers. We are opposed to all forms of discrimination with respect to employment and occupation, modern slavery, human trafficking, forced or compulsory labor, and child labor. We expect our Suppliers to comply with all relevant human rights laws and regulations.

Health and Safety

DataBank is committed to the health and safety of our employees, customers, Suppliers, and communities. As outlined in our [EHS Policy](#), Suppliers are expected to abide by our health and safety standards and comply with all applicable occupational health and safety laws and regulations. Any unsafe conditions, potential hazards, injury, accident, or illness should be reported to DataBank at EHS@ databank.com within 24 hours of the incident, regardless of the severity.

Environment and Sustainability

At DataBank we are committed to protecting the environment and reducing our consumption of resources. We have set a goal of scope 1 and 2 net zero emissions by 2030 and developed a [Climate Policy](#), both of which we expect Suppliers to support. At a minimum, Suppliers shall comply with all local, state and federal environmental regulations. DataBank encourages its Suppliers to develop environmental and energy management programs and take steps to measure, report, and manage their environmental footprints including their emissions, energy consumption, water use, air pollution, and waste generation. As we all work towards sustainable business practices, DataBank may, on an annual basis, request Suppliers to provide environmental and sustainability data to support DataBank's transparent reporting initiatives.



Audit

While Suppliers are expected to self-monitor and demonstrate their compliance with the SCoC, DataBank may audit Suppliers' or inspect Suppliers' facilities to confirm compliance. Suppliers that behave in a manner that is unlawful or inconsistent with the SCoC or any other contractual requirements risk termination of their business relationship with DataBank.

Supplier Screening and Onboarding

Suppliers shall comply with DataBank's screening, onboarding procedures, and other applicable policies.

Subcontractor Monitoring

Suppliers shall monitor and verify their subcontractors to assess, prevent, remediate and/or report any actual or potential noncompliance associated with all sections of this SCoC.

Reporting Violations

Suppliers shall report to DataBank any conduct, including conduct of any DataBank employee, that the Suppliers believe in good faith to be an actual, apparent or potential violation of this SCoC. Prompt reporting of misconduct is in the best interest of everyone and helps ensure our continued ethical business relationship. DataBank will maintain confidentiality to the extent possible and will not tolerate any retaliation taken against any individual who has, in good faith, reported questionable behavior or a possible violation of this SCoC.

Suppliers are encouraged to contact DataBank with questions about this SCoC and to promptly report a potential violation. Any suspected ethical or regulatory violations can be reported anonymously through DataBank's EthicsPoint Hotline:

- Online: www.DataBank.ethicspoint.com
- Mobile Devices: www.DataBankmobile.ethicspoint.com
- US Toll-Free: 844-979-4929
- UK Toll-Free: Dial 0-800-89-0011, then dial 44-979-4929.