

Introduction

At Xperate, we are committed to operating with integrity, transparency, and respect for the people and communities we impact. As a global software development consultancy, we expect the same high standards from every supplier, partner, contractor, and service provider we work with.

This Supplier Code of Conduct outlines the ethical, environmental, and professional principles we require all suppliers - and their own supply chains—to uphold. By working with Xperate, suppliers agree to support and promote these values throughout their organisation.

1. Ethical Business Practices

1.1 Fair and Honest Conduct

Suppliers must conduct business with honesty, fairness, and professionalism at all times. This includes:

- Acting with integrity in all business dealings
- Protecting confidential information shared by Xperate
- Avoiding conflicts of interest
- Competing fairly and responsibly

1.2 Compliance With Laws

Suppliers must comply with all applicable international, national, and regional laws and regulations, including those related to:

- Employment
- Environment
- Data protection and privacy
- Trade controls
- Anti-corruption
- Modern slavery

2. Human Rights & Labour Standards

Xperate is committed to protecting human rights and expects suppliers to uphold the following principles:

2.1 No Modern Slavery

There must be **zero tolerance** for:

- Human trafficking

- Forced, bonded, or compulsory labour
- Child labour
- Any form of servitude

2.2 Fair Employment Practices

Suppliers must:

- Provide fair compensation and working hours
- Ensure legally compliant employment terms
- Allow freedom of association and collective bargaining
- Avoid all forms of discrimination, harassment, or abuse

2.3 Safe & Respectful Workplace

Suppliers must provide a safe, healthy, and respectful working environment, following recognised health and safety standards and taking proactive steps to minimise workplace risks.

3. Anti-Bribery & Anti-Corruption

Xperate applies a **zero-tolerance** approach to bribery and corruption. Suppliers must not engage in:

- Offering, giving, or receiving bribes
- Improper gifts or hospitality
- Kickbacks, commissions, or facilitation payments
- Fraud, deception, or any unethical financial practice

Suppliers must maintain transparent and accurate financial records that reflect actual transactions.

4. Data Protection & Information Security

Suppliers handling Xperate data or customer information must:

- Comply with all applicable data protection laws (such as GDPR)
- Maintain strong information security measures
- Use data only for agreed business purposes
- Notify Xperate promptly of any suspected or actual data breach

5. Environmental Responsibility

Xperate encourages suppliers to operate in an environmentally responsible manner, including:

- Minimising waste and emissions

- Using resources efficiently
- Complying with environmental laws and standards
- Reducing environmental impact across operations and supply chains

6. Whistleblowing & Reporting Concerns

Suppliers must foster a culture where workers can safely raise concerns without fear of retaliation. Suppliers should provide confidential channels for staff to report issues related to:

- Ethical breaches
- Unsafe conditions
- Human rights concerns
- Unlawful behaviour

Any concerns affecting Xperate must be reported promptly.

7. Compliance, Monitoring & Consequences

Xperate reserves the right to assess supplier compliance with this Code of Conduct, which may include:

- Requests for supporting information
- On-site audits with reasonable notice
- Corrective action plans where needed

Failure to comply with this Code may result in suspension or termination of the business relationship.

Suppliers who are unable to meet any aspect of this Code must notify us immediately.

8. Commitment to Shared Values

By working with Xperate, suppliers acknowledge and accept this Supplier Code of Conduct. We expect suppliers not only to uphold these principles, but also to promote them within their own supply chains—helping to build a responsible, ethical, and sustainable global business environment.