



# Supplier Code of Conduct

QBA Third-Party Supplier Policy

## Introduction

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QBA firmly believes that its suppliers are an integral part of its ecosystem, and is committed to creating an environment where suppliers are confident they will be treated with respect. This Supplier Code of Conduct (“Supplier Code”) details the expectations QBA has of its suppliers and applies to QBA and its subsidiaries.

The term “Supplier” means any entity or person that sells, or seeks to sell, goods or services to QBA, including the Supplier’s employees, agents, and other representatives.

QBA conducts all business transactions with integrity and transparency and expects its Suppliers to uphold the same standards of ethics and integrity in all business dealings. This Supplier Code is organized into six sections: Ethics and Compliance with Laws; Labor Practices and Human Rights; Health and Safety; Environment and Community; Management System; and Reporting Concerns.

## A. Applicability

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The policy shall be applicable to all suppliers and vendors unless otherwise agreed.

## B. Ethics and Compliance with Laws

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QBA expects its Suppliers to partner with it with integrity and in an ethical manner, and to comply with all applicable anti-bribery and corruption laws. QBA maintains a zero-tolerance policy with respect to bribery and corruption and does not permit Suppliers or other third parties acting on its behalf to make such payments.

### Suppliers shall additionally:

- Disclose conflicts of interest involving QBA personnel promptly upon becoming aware of them.
- Ensure quality of goods and services delivered is in line with contractual terms and applicable product safety and labeling laws.
- Uphold fair business, advertising, and competition standards, and not engage in collusive bidding or price fixing.
- Comply with applicable export control and sanctions laws, and not transact with sanctioned or embargoed parties.
- Protect QBA’s confidential information, intellectual property, and Personal Data, and report any data breach to [Insert Security Incident Email] within 48 hours of discovery.
- Not use QBA’s brand name or logo, or comment publicly on their engagement with QBA, without prior written approval.
- Be responsible for ensuring any third party they engage to support QBA also adheres to this Supplier Code.

## C. Labor Practices and Human Rights

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QBA is committed to upholding the human rights of workers and treating them with dignity and respect. Suppliers shall comply with applicable wage, benefits, and working hours laws; shall not employ child labor or engage in forced, bonded, or compulsory labor or human trafficking; shall not confiscate worker identity documents; and shall not tolerate harassment, discrimination, or inhumane treatment of any kind. Suppliers shall respect employees’ rights to freedom of association and collective bargaining, and shall maintain a written grievance mechanism for employee concerns.

## D. Health and Safety

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Suppliers shall provide employees a safe and healthy workplace in compliance with applicable laws, addressing occupational safety, emergency preparedness, injury and illness prevention, industrial hygiene, and sanitation, and shall take adequate steps to minimize workplace hazards and prohibit illegal drug use in connection with their work for QBA.



## E. Environment and Community

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Suppliers shall develop and maintain environmentally responsible business practices, working towards reduced energy consumption and emissions, responsible water use, waste segregation and pollution reduction, and protection of biodiversity. Suppliers shall ensure their operations are in harmony with community stakeholders and do not infringe upon community land, forest, or water rights.

## F. Management System and Supplier Obligations

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Suppliers must establish a management system to demonstrate compliance with this Supplier Code, communicate the Code to their employees, subsidiaries, and subcontractors in a language known to them, and self-monitor their compliance, sharing reports with QBA upon request.

QBA reserves the right to conduct audits, with prior intimation, covering ESG, sustainability, modern slavery, information security, business continuity, and contractual compliance. Audits may be conducted physically, virtually, or in hybrid mode, by QBA or a nominated third party. Suppliers shall support such audits, provide requested artifacts within agreed timelines, and submit corrective action plans with evidence for any findings. Failure to cooperate may result in termination of the relationship.

## G. Reporting Concerns

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Suspected violations of this Supplier Code may be reported via email at [speakup@qbadvisory.com](mailto:speakup@qbadvisory.com).

It is important that all suspected violations, including retaliation, are reported. QBA will maintain confidentiality to the extent possible and will not tolerate retaliation against any individual who, in good faith, raises a concern or reports a possible violation of this Supplier Code. QBA is committed to fairly assessing all issues raised and providing resolution.

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