

Supplier Code of Conduct

Introduction

At ADAMftd Pte Ltd, we are dedicated to maintaining the highest standards of integrity, transparency, and ethical conduct across our operations. Our Supplier Code of Conduct outlines the principles and expectations we hold for our suppliers to ensure ethical business practices and compliance with applicable laws. This code is integral to our mission of promoting supply chain transparency, corporate due diligence, supply chain traceability, trade compliance, market analysis, and risk management.

Integrity and Transparency

Suppliers play a crucial role in upholding the integrity and transparency of the supply chain. We expect our partners to adhere to the highest ethical standards, ensuring that all business dealings are conducted honestly and openly. This commitment to transparency is vital for building trust and ensuring that our collective operations are ethical and compliant with all applicable regulations.

- **Honesty in Reporting:** Suppliers must provide accurate and truthful information in all business dealings and communications with ADAMftd.
- **Transparency:** Suppliers are expected to conduct their operations transparently, particularly in data sourcing, access, and corporate due diligence, ensuring that the information provided is trustworthy and verifiable.

Compliance with Laws and Regulations

ADAMftd is committed to ensuring that all our suppliers operate within the legal frameworks that govern their activities. Compliance with these laws is crucial for maintaining transparency, ethical standards, and accountability across our supply chains. Our suppliers must rigorously adhere to all relevant regulations to foster a responsible and lawful business environment. The following points outline the specific legal and regulatory requirements that our suppliers must comply with:

- **Trade Compliance:** Adherence to all relevant international trade laws and regulations is mandatory. Suppliers must ensure compliance with applicable trade compliance standards.
- **Supply Chain Laws:** Suppliers must comply with laws related to supply chain transparency, traceability, anti-slavery, conflict minerals, human rights, AML, and KYC.
- **Anti-Slavery Laws:** Suppliers must adhere to laws prohibiting modern slavery and human trafficking, ensuring that their operations and supply chains are free from such practices.
- **Conflict Minerals:** Suppliers must comply with regulations regarding the sourcing of conflict minerals, ensuring their supply chains do not contribute to human rights abuses.
- **Human Rights:** Suppliers must uphold and promote human rights in all business activities, ensuring fair treatment and respect for all individuals.
- **Good Corporate Citizenship:** Suppliers are expected to comply with national laws and global standards and contribute to ethical business practices and transparency worldwide.

Ethical Business Practices

ADAMftd is committed to fostering an environment of ethical business conduct throughout our supply chains. We expect our suppliers to uphold the highest standards of integrity, fairness, and responsibility in all their dealings. Ethical business practices are essential for maintaining trust and credibility with stakeholders, including customers, partners, and the broader community. The following principles outline the core ethical standards that our suppliers must adhere to:



- Anti-Corruption: Suppliers must prohibit all forms of corruption and bribery, ensuring fair and just business practices.
- Fair Competition: Suppliers must engage in fair and ethical competition, avoiding practices that could unfairly limit competition or harm consumers.
- **Respect for Human Rights:** Suppliers must respect human rights, ensuring no engagement in or support of practices that violate these rights.
- **Confidentiality:** Suppliers must protect confidential information and respect privacy rights, ensuring data is handled responsibly and securely.
- **Sustainable Practices:** Suppliers must commit to sustainability and environmental responsibility, minimizing their environmental impact.
- **Diversity and Inclusion:** Suppliers should promote diversity and inclusion, providing equal opportunities for all employees.
- Workplace Safety: Suppliers must ensure a safe and healthy working environment for all employees, complying with relevant health and safety regulations.

Supplier Responsibilities

At ADAMftd, we hold our suppliers to the highest standards of conduct to ensure the integrity, transparency, and ethical behavior of our entire supply chain. Our suppliers play a crucial role in our business operations, and it is imperative that they adhere to these principles to maintain trust and foster a collaborative environment. The following responsibilities outline our expectations from all our suppliers:

- Ethical Standards: Suppliers must adhere to the highest ethical standards in all interactions with ADAMftd.
- **Transparency:** Suppliers must conduct business transparently, providing accurate and truthful information.
- Anti-Corruption: Suppliers must prohibit all forms of corruption and bribery.
- **Confidentiality:** Suppliers must protect confidential information obtained through their relationship with ADAMftd.
- Anti-Harassment: Suppliers must ensure a workplace free from harassment, including sexual harassment and discrimination based on religion, disabilities, race, nationality, or gender identity.
- Fair Competition: Suppliers must engage in fair competition practices.
- Environmental Responsibility: Suppliers should adopt sustainable practices and minimize their environmental impact.
- Diversity and Inclusion: Suppliers should promote diversity and inclusion within their workforce.
- Workplace Safety: Suppliers must ensure a safe and healthy working environment for all employees.
- **Supply Chain Responsibility:** Suppliers must ensure their supply chains are free from modern slavery, human trafficking, and other unethical practices.
- **Product and Service Quality:** Suppliers must ensure the products and services provided to ADAMftd meet the agreed-upon standards of quality and reliability.
- **Reporting Violations:** Suppliers should promptly report any violations of these responsibilities or any unethical behavior observed in dealings with ADAMftd.

Conclusion

ADAMftd is committed to fostering an ethical business environment and promoting transparency in international trade. We expect all suppliers to uphold these values and contribute to a fair and just global trading system. By adhering to this Supplier Code of Conduct, suppliers help us achieve our mission of promoting supply chain transparency, corporate due diligence, supply chain traceability, trade compliance, market analysis, and risk management.



ADAMftd Pte Ltd.

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Signed,

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James York Chief Executive Officer ADAMftd Pte Ltd 30th June 2024