Supplier Code of Conduct

Introduction

At AtlasEdge, we are committed to the highest principles and standards of ethical conduct, safety, sustainability, and regulatory compliance in the construction and operation of our data centres. Our suppliers share these values and we require that they meet the standards set out in this Supplier Code of Conduct ("**SCoC**"). Compliance with these principles and standards is essential for maintaining business relationships with AtlasEdge.

The SCoC applies to all AtlasEdge business partners, including but not limited to our suppliers, resellers, contractors, consulting partners and service providers ("**Suppliers**"). It states our expectations of AtlasEdge Suppliers and their employees, agents and subcontractors when conducting business with or on behalf of AtlasEdge.

Aherence to the principles set out in this SCoC forms an integral part of AtlasEdge's contractual conditions with Suppliers. Suppliers should ensure that the principles and standards set out in this SCoC are implemented in their operations and across their supply chain.

All references to AtlasEdge include the relevant contract entity and each direct or indirect parent or subdiary company that benefits from the goods and services being provided.

1. Anti-Corruption (Including FCPA and UK Bribery Act)

Suppliers must comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. This includes:
- **No Bribery or Corruption**: Suppliers must not engage in any form of bribery, facilitation payments, or corrupt practices when dealing with government officials, customers and/or business partners including their suppliers.
- **Accurate Records**: Suppliers must maintain accurate and transparent financial records that truly and fairly reflect all transactions.
- **Internal Controls**: Suppliers must establish internal controls to prevent, detect, and address any instances of corruption.
- **Tax Evasion and Fraud Prevention**: Suppliers must take measures to prevent facilitating tax evasion or fraud in any form.

2. Information Security and Data Privacy

Suppliers must protect the confidentiality, integrity, and security of any sensitive data exchanged with AtlasEdge (or held thereafter). This includes:
- Implementing appropriate physical and cyber security measures to safeguard data centre infrastructure and information.
- Complying with all applicable data privacy laws, such as GDPR (UK and EU) and CCPA, to ensure that personal and/or sensitive data is protected.
- In case of a data breach or a cyber security incident that could affect AtlasEdge or its clients, Suppliers must immediately notify AtlasEdge and fully cooperate in any investigations or remediation efforts.

3. Ethics (Conflicts of Interest)

Suppliers must act in the best interests of AtlasEdge and avoid conflicts of interest (including the appearance of a conflict of interest). Key requirements include:
- **Disclosure of Conflicts**: Suppliers must disclose any actual or potential conflicts of interest to AtlasEdge and seek guidance on how to address them.
- **Impartiality**: Suppliers must avoid any activities or relationships that could compromise their impartiality or create the appearance of a conflict of interest.
- **Ethical Dealings**: Suppliers are expected to uphold principles of fairness, integrity and transparency in all business dealings.

4. Environmental, Health and Safety Compliance

Suppliers must comply with all applicable environmental, health, and safety (EHS) laws and regulations, ensuring (among other things) the safe and sustainable construction and operation of data centres. This includes:

- **Environmental Responsibility**: Suppliers must take steps to minimise their environmental impact, including energy-efficient design, water conservation, waste reduction, and emissions control.
- **Occupational Safety**: Suppliers must ensure a safe working environment by adhering to safety standards, providing appropriate protective equipment, and ensuring employees are trained on safety protocols.
- **Emergency Preparedness**: Suppliers must implement robust safety procedures for dealing with emergencies, including fire hazards, electrical risks, and equipment malfunctions.
- **Sustainability Measures**: Suppliers should implement energy-efficient technologies (wherever possible) and ensure responsible waste disposal practices in line with sustainable development goals.
- **Regulatory Reporting:** Suppliers must support AtlasEdge in its regulatory reporting requirements for Environmental, Health and Safety.

5. Trade Compliance

Suppliers must comply with all applicable trade regulations, including import/export and customs laws. This includes:
- **Compliance with Export Controls**: Suppliers must ensure that all materials, technology, and equipment used in the data centre construction and operations comply with local export control laws and sanctions.
- **Proper Documentation**: Suppliers must provide accurate information regarding the origin, classification, and valuation of goods for customs purposes.
- **Licenses and Permits**: Suppliers must obtain the necessary licenses and certifications for cross-border transactions involving critical equipment or technology.

6. Anti-Money Laundering

Suppliers must take measures to prevent money laundering and comply with anti-money laundering ("**AML**") laws. This involves:
- **Due Diligence**: Suppliers must implement procedures to identify and verify the identity of customers and suppliers to prevent fraudulent financial activities.
- **Financial Integrity**: Suppliers must maintain accurate financial records and report any suspicious transactions or activities to relevant regulatory authorities.
- **AML Controls**: Suppliers should adopt internal controls to detect and prevent money laundering or the financing of terrorism.

7. Fair & Professional Business Practices (Including Antitrust and Competition)

Suppliers involved in the construction and operations of data centres are expected to conduct business professionally, particularly in the selection and management of subcontractors and must comply with all antitrust and competition laws. Key requirements include:
- **Subcontractor Evaluation**: Suppliers must implement a fair and transparent process for evaluating and selecting subcontractors. All subcontractors should be evaluated based on merit, technical expertise, compliance with safety standards, and ability to meet the project's requirements.
- **Avoiding Favouritism**: Suppliers must avoid favouritism or unfair preferences when selecting subcontractors. Decisions must be based on objective criteria to ensure the best outcomes for the project.
- **Ethical Business Conduct**: Suppliers are expected to conduct all business transactions with professionalism, fairness, and integrity. Accurate information about capabilities, timelines, and pricing must be provided during project bids and execution.
- **Compliance with Antitrust Laws**: Suppliers must avoid anti-competitive practices, such as price-fixing, bid-rigging, or market allocation, and ensure that all procurement decisions are based on merit and competitiveness.
- **Fair Bidding**: Suppliers must participate in fair bidding processes and avoid deceptive or collusive practices.
- **Respect for Intellectual Property**: Suppliers must protect and respect intellectual property rights and maintain confidentiality over proprietary data, technology, and systems used in data centre operations.
- **Whistleblower Protections**: Suppliers must establish systems for employees to report unethical or illegal activities without fear of retaliation. Reports must be investigated and appropriate action taken to address any failures.

8. Labour and Employment Compliance (Local Labour Law Regulations)

Suppliers must comply with all local labour laws and international labour standards, ensuring fair treatment of workers:
- **Fair Compensation**: Workers must be provided with fair wages, benefits, and working conditions that meet or exceed local legal requirements.

- **No Child or Forced Labour**: Suppliers must not use child labour, forced labour, or engage in any form of human trafficking.
- **Employee Rights**: Employees must be free to associate, bargain collectively, and work in a non-discriminatory environment free from harassment or abuse.

9. Supplier Risk Assessment

To ensure alignment with our ethical, environmental, and operational standards, Suppliers must implement and manage a risk assessment process to identify and mitigate potential risks associated with their own supply chain.

- **Risk Criteria**:
    i. **Financial Stability**: Suppliers key subcontractors should demonstrate financial health through credit ratings and financial statements to ensure they can fulfill their obligations.
    ii. **Compliance**: Suppliers subcontractors should verify adherence to local and international laws, including labour and environmental regulations.
    iii. **Ethical Standards**: Suppliers should evaluate their key subcontractors commitments to ethical practices.
- **Data Collection**:
    i. Suppliers should utilise surveys and questionnaires to gather information and assess risks.
    ii. Suppliers may conduct on-site audits to validate compliance with AtlasEdge standards.
- **Scoring and Rating**:
    i. Suppliers should implement a scoring system (e.g., low, medium, high) to categorise risk exposure, which will help prioritise those needing closer oversight.
- **Integration with Procurement**:
    i. Risk assessments must be embedded within the procurement process to ensure evaluations are completed before finalising contracts and are part of ongoing supplier management.
- **Documentation**:
    i. Suppliers must maintain records of assessments and decisions for accountability and compliance purposes.
- **Continuous Improvement**:
    i. Suppliers should regularly update their risk assessment processes to adapt to changing market conditions and regulatory requirements.

Monitoring and Compliance
AtlasEdge reserves the right to monitor and audit Supplier activities to ensure compliance with this SCoC. Suppliers must fully cooperate with these efforts, including providing access to facilities, documentation, and personnel as required.

Reporting Violations
Suppliers must promptly report any violations of this SCoC or applicable laws to AtlasEdge. Reports can be made confidentially and Suppliers will not face retaliation for raising concerns in good faith.

Acknowledgement
By engaging in business with AtlasEdge, Suppliers acknowledge and commit to comply with this SCoC, ensuring that their operations align with the ethical, legal, and sustainability standards of our organisation. The SCoC will be periodically updated to reflect changes in laws and regulations as well as AtlasEdge's policies and standards and, unless stated otherwise, will be effective when posted. Suppliers are required to keep themselves informed as to any changes to this SCoC.