

Suppliers Standards of Conduct

Diamondpick expects all Suppliers to uphold the Supplier Standards and urges the adoption of similar standards within their own businesses and apply those standards to subcontractors.

Relationship based on Trust

The relationship between Diamondpick and its direct and indirect affiliates and its Suppliers is an integral part of achieving and maintaining high performance in Diamondpick's business. Diamondpick is committed to working with reputable business partners who share our dedication to ethical business conduct and policies.

Suppliers are required to comply with all applicable laws, regulations, and rules, including relevant local laws and regulations such as those related to business integrity, human rights, health and safety, trade, and the environment.

Doing Business with Integrity

Suppliers must conduct business interactions and activities with integrity and must, without limitation:

- 1. Conduct business in compliance with antitrust and fair competition laws** that govern the jurisdiction(s) in which they conduct business. Suppliers must avoid agreements and practices that have a restrictive effect on competition such as price fixing, market allocation, or abuse of a dominant position.
- 2. Comply with all applicable anti-corruption laws**, including the India Prevention of Corruption Act of 1988, and local anti-corruption laws, as well as applicable laws governing lobbying, gifts, donations, hiring and payments to public officials, political campaign contribution laws and other related regulations. In addition, Diamondpick expects Suppliers to make reasonable efforts to implement procedures to ensure compliance with anti-corruption laws.
- 3. Suppliers must not engage, directly or indirectly, in bribery or corruption.** Suppliers must not promise, authorize, offer, or pay anything of value (including but not limited to gifts, travel, hospitality, charitable donations, or employment) to any person, including in particular any "Government Official," in order to improperly influence any act or decision of such official for the purpose of obtaining or retaining business or any improper business advantage related to Diamondpick or that would otherwise constitute a bribe, facilitation payment, kickback, or other illegal payment or benefit. A Government Official is any individual acting in an official capacity for or on behalf of any government or government division, department, agency, or instrumentality of such a government or organization, political party, or company or entity owned or controlled by or acting on behalf of any of the above.
- 4. Implement sufficiently robust risk management procedures** and internal controls to detect, prevent, deter and respond to all forms of financial crime, including tax evasion, facilitation of tax evasion, money laundering, fraud and the financing of terrorism.

Introduction

Diamondpick's Supplier Standards of Conduct, which aligns with our Code of Ethics, apply to all of our third-party representatives, suppliers, vendors, subcontractors and business development agents and their parent, subsidiary and affiliated entities, or collectively, Suppliers, including Suppliers engaged by Diamondpick's subsidiaries and affiliates.

All Suppliers are responsible to ensure that their employees, including temporary, migrant, student, contract, and direct employees, performing services in relation to Diamondpick business are familiar, and comply, with these Supplier Standards. Diamondpick expects its Suppliers to adopt similar standards within their own businesses and apply those standards to their next-tier suppliers.

The Supplier Standards are not intended to conflict with or modify any existing contractual terms between Diamondpick and its Suppliers. The Standards are intended to offer guidance for Diamondpick's suppliers and, should a conflict arise, any existing contractual terms and conditions will take precedence.

5. **Honestly and accurately maintain books and records**, including receipts and expenses, related to Diamondpick's business, and report all business information and comply with all applicable laws regarding their completion and accuracy. Suppliers shall make such books and records available for review by Diamondpick, or by an independent party agreed upon by the Supplier and Diamondpick, at Diamondpick's reasonable request. Suppliers must create, retain and dispose of business records in compliance with all applicable legal and regulatory requirements.

6. **Be clear, transparent, and truthful in providing information to Diamondpick.** Suppliers must not engage with Diamondpick employees in any way that could cause a potential or actual conflict of interest, for example dealing with any Diamondpick employee who has a close personal relationship with anyone that holds a financial interest in the Supplier, including their family members, intimate partners and close friends. Suppliers must not seek to take advantage through concealment, manipulation, abuse of confidential information, misrepresentation of facts or any other unfair dealing practice.

7. **Suppliers must not unlawfully use insider information relating to Diamondpick** for material gain or disclose insider information to unauthorized persons. Suppliers must not engage subcontractors in performing work for Diamondpick without prior notification.

8. **Comply with applicable Trade Control laws and regulations.** This includes:

1. Avoiding the "embargoed" jurisdictions that Diamondpick does not do any business or transact with – directly or indirectly. These jurisdictions currently include Cuba, Iran, North Korea, and Syria, as well as the Crimea, Donetsk People's Republic, and Luhansk People's Republic regions of Ukraine. [ND3]

2. Being aware of the significant sanctions and trade controls on certain other countries, including but not limited to, Russia, Belarus, Burma / Myanmar, and Venezuela that restrict the ability to engage or transact with parties there.

3. Ensuring that Diamondpick does not work with certain persons and companies – "denied parties" – because they are named on lists published by governmental authorities, including OFAC's Specially Designated Nationals ("SDN") list, BIS' Entity List, Her Majesty's Treasury Sanctions List, and EU Consolidated List of Financial Sanctions.

4. Recognizing that Trade Controls, such as the US Export Administration Regulations, EU Dual Use Export Control Annex, and UK Strategic Export Control Lists, govern the export of products, hardware, software, data, services, and technology around the world.

Respect for People and the Environment

Labour and human rights

As expressed in Diamondpick's Human Rights Policy, we respect, consider, integrate and promote internationally recognized human rights in accordance with principles outlined in the United Nations Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. [ND4]

Diamondpick expects its Suppliers to commit to these same principles concerning fundamental rights at work in the eight core conventions of the ILO's Declaration and conventions on working hours. In addition, we expect our Suppliers to respect, in particular, the rights of women, children, migrants and other vulnerable groups and individuals, in accordance with the ILO conventions and the Convention on the Rights of the Child. Diamondpick's standards on labour and human rights specifically include the following requirements:

1. **Prohibition on Discrimination.** Suppliers must provide a workplace free from discrimination, harassment, or any type of abuse. Suppliers must not discriminate against a person's Legally Protected Characteristics, such as race, colour, religion, gender identity, pregnancy, age, national origin, sexual orientation, marital status, disability status, veteran status, or freedom of association, including political affiliations and union memberships, when making employment decisions, including recruiting, hiring, training, promotion, termination, or providing other terms and conditions of employment. Suppliers should also promote diverse and inclusive workplace environments where everyone is treated with respect and where people are encouraged to embrace diverse backgrounds, cultures and thought. In addition, Suppliers should make reasonable efforts to engage under-represented diverse businesses such as minority-owned, women-owned, disabled-owned, LGBTQ-owned and veteran-owned companies (where it is legal to classify suppliers in these groups) when making their own sourcing decisions. Please see Diamondpick's Harassment & Discrimination Prevention Policy.

2. Prohibition on Child Labour. Diamondpick strictly prohibits the use of child labour in any of the Supplier's operations. Suppliers must not employ workers younger than the greater of (a) 15 years of age, or 14 where the local law allows such exception consistent with International Labour Organization guidelines, or (b) the age for completing compulsory education, or (c) the minimum age established by law in the country of operations. In addition, Suppliers must comply with all legal requirements for authorized young workers (including students and interns), particularly those pertaining to hours of work, wages and working conditions.

3. Prohibition on Forced Labour. All forms of forced or compulsory labour, such as prison labour, bonded labour, or indentured labour, are forbidden in any operations. Forced overtime and human trafficking are also strictly prohibited. Additionally, Diamondpick expects Suppliers to follow responsible recruitment practices to prevent forced labor and other forms of modern slavery. Suppliers and their labour agents and sub agents shall not hold, destroy, conceal, confiscate, or deny workers access to their identity or immigration documents.

4. Prohibition on charging Workers for employment: Suppliers should not charge any recruitment or other related fees to workers for employment. If any such fees are found to have been charged by the Suppliers to workers, such fees shall be repaid to the workers immediately.

5. Commitment to Health and Safety. Suppliers must provide clean, safe and healthy working conditions for all employees. Suppliers must comply with all applicable, legally mandated standards for workplace health and safety in the countries in which they operate, and Diamondpick encourages Suppliers to implement industry best practices.

6. Fair Wages and Benefits. Suppliers must pay workers according to any applicable minimum wage, as well as any legally mandated overtime premium for all hours worked. Suppliers also must ensure that any legally mandated benefits are being provided to their employees and that there are no illegal deductions for employee benefits. Workers must be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Suppliers shall also take steps to ensure equal pay for equal work and that remuneration for work of equal value is established without discrimination.

7. Working Hours. Working hours are not to exceed the maximum set by local law. Furthermore, a standard workweek should not exceed 48 hours or 60 hours, including overtime, except in emergency or unusual situations. All overtime must be voluntary and workers must be allowed at least one day off every seven days.

8. Freedom of Association and Collective Bargaining. Suppliers must respect the right of all workers to form and join, or not join, a trade union of their choice (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) and to bargain collectively. Suppliers will prohibit any form of intimidation, harassment, retaliation and violence against workers exercising these rights.

9. Commitment to Responsible Sourcing. Suppliers will be committed to sourcing goods and services for Diamondpick in alignment with all the principles and standards laid out in Diamondpick's Supplier Standards of Conduct. Suppliers should give exceptional emphasis to sourcing with the same fundamental support of human rights, labour, health and safety, environment and ethics as set forth in these Supplier Standards.

Environmental responsibility

Diamondpick encourages its Suppliers to draw upon internationally recognized principles to advance social and environmental responsibility.

1. Compliance with all Applicable Environmental Laws. Suppliers must comply with all local environmental laws applicable.
2. Environmental Management. Diamondpick encourages Suppliers to focus on continuous improvement of environmental performance, including in the areas of water, waste, chemicals and energy and emissions management.

Our Responsibilities

Data and Intellectual Property Responsibility

Suppliers will respect intellectual property rights, protect confidential information and comply with privacy rules and regulations. All Diamondpick Suppliers must, without limitation:

1. Protect and responsibly use the physical and intellectual assets of Diamondpick, including intellectual property, tangible property, supplies, consumables and equipment, when authorized by Diamondpick to use such assets.
2. Respect and protect the intellectual property rights of all parties by using only information technology and software that has been legitimately acquired and licensed.
3. Use software, hardware and content only in accordance with their associated licenses or terms of use.
4. Use Diamondpick -provided information technology and systems (including email) only for authorized Diamondpick business-related purposes. Diamondpick strictly prohibits Suppliers from using Diamondpick -provided technology and systems to (1) create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate, or (2) send any false, derogatory, or malicious communications.
5. Any solicitation of Diamondpick employees using information gathered from Diamondpick -provided technology or systems is prohibited.
6. Consider all data stored or transmitted on Diamondpick -owned or leased equipment to be the property of Diamondpick. Diamondpick may monitor all use of the corporate network and all systems (including email) and may access all data stored or transmitted using the Diamondpick network.
7. Comply with the intellectual property ownership rights of Diamondpick and others, including but not limited to copyrights, patents, trademarks and trade secrets.
8. Manage the transfer of technology and know-how in a manner that protects intellectual property rights.
9. Follow all local privacy and data protection laws.
10. Provide clear and accurate privacy notices when collecting or processing personal data.
11. Honor privacy choices by using data only as agreed to by Diamondpick representatives or Diamondpick's customers.
12. Protect data by building secure products and services.

Information security responsibility

We expect our Suppliers and their third-party suppliers or subcontractors to comply with contractually agreed Information Security & Privacy requirements throughout the contracted period. Suppliers must:

1. Act in good faith to deliver Information Security & Privacy obligations in a timely manner, including but not limited to extending support to annual audits and risk assessments, ensuring third party assessments and attestations are kept current. Notify Diamondpick proactively of lapse in any of the aforementioned, and mitigating and cooperating with Diamondpick in the resolution of any security incidents or breaches impacting Diamondpick or its customers.
2. Notify Diamondpick:
 - Within contractually agreed upon timeframes of any security incident that impacts Diamondpick or our customers at <mail id>
 - As soon as reasonably possible of any change in their security management or controls affecting the services or solutions provided to Diamondpick.
3. Adhere to and maintain security standards commensurate with industry recognized security frameworks and Diamondpick's security standards.

4. Obtain approval from Diamondpick's Corporate Security team prior to performing any integration between the infrastructure of:
 - Diamondpick and Suppliers,
 - Diamondpick's Customers and Suppliers,
 - or between Diamondpick, Diamondpick's Customers & Suppliers.
 - Assets involved in integration must be updated with current patch levels and their configuration must be hardened and follow "least privilege policy."
5. Mitigate, within contractually agreed upon turnaround times, any risks discovered through Diamondpick's or any external accredited party's security assessments or audits.
6. Provide appropriate physical and technical security measures to protect Diamondpick's or its clients' data in its possession throughout the contracted period against unauthorized access, usage, destruction and modification.
7. Terminate the integration of its IT platforms or those of its third-party suppliers with Diamondpick's or our clients' IT platforms, delete relevant security credentials created in supplier systems at the time of contract termination or when the need for such integration ceases and provide written confirmation to Diamondpick of such termination.
 - a. Upon termination as agreed in the Supplier's contract, any assets and/or confidential data must be returned or deleted.

Business continuity responsibility

Diamondpick maintains a Business Resilience office, whose mission is to align, centralize and integrate disciplines and capabilities to deliver timely and effective incident identification, impact assessments, escalation, communication, and resolution. The resiliency efforts extend beyond the assets of Diamondpick to the third-party service providers that support our business processes.

Diamondpick expects its suppliers to manage business continuity risk to ensure availability of critical services to Diamondpick during a disaster event. It is a requirement that each supplier maintain a comprehensive business continuity program that addresses the loss of facilities, technology, human capital, or suppliers necessary to support Diamondpick. We routinely request collaborative disaster recovery testing with our Suppliers to appraise their resiliency and identify potential issues that would impact continuous service delivery to our customers. Suppliers are expected to share these plans as requested.

Compliance with the supplier standards of conduct

These Supplier Standards are incorporated into the Agreement between Suppliers and Diamondpick by reference. Compliance with these Supplier Standards is mandatory. At the same time, should these Standards conflict with the terms of any Agreement, any existing contractual terms and conditions will take precedence.

Diamondpick reserves the right to monitor and audit each supplier's compliance with the Supplier Standards including, but not limited to, conducting on-site audits of our Suppliers' premises, IT systems and infrastructure. Suppliers should maintain all documentation necessary to demonstrate compliance with the Supplier Standards and cooperate with Diamondpick associates or third-party monitoring firms in connection with such inspections, or other Diamondpick -initiated fact-finding inquiries related to Supplier's work for Diamondpick.

Failure to comply with these Supplier Standards may lead to consequences, including termination as a Supplier to Diamondpick.

Reporting of violations

Suppliers, and their employees and supply chains, are obliged to inform Diamondpick immediately if they suspect or become aware of any unethical conduct, actual or potential violation of the Supplier Standards or of any applicable law, regulation or rule. Reports can be made to your business sponsor and/or the Diamondpick Ethics & Compliance Team, anonymously. Diamondpick does not retaliate against anyone for submitting in good faith a report of suspected or known misconduct, nor does Diamondpick tolerate others retaliating.

- > Finance and Human Resources
- > CFO and CHRO
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Contact

If any part of the Supplier Standards is unclear, please reach out to your business sponsor or contact Finance mail id dpfpna@diamondpick.com

Policy Control Information

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