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# Vendor Code of Conduct

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## OBJECTIVE

Enstar is committed to maintaining a high ethical standard in all its business activities. Our aim is to:

- Conduct business responsibly, in accordance with all legal, regulatory, and moral expectations;
- Maintain high standards of welfare for individuals, including staff and all those involved in its supply chain;
- Minimise our impact on the environment through adoption of 'green' initiatives wherever possible.

Enstar expects all its vendors to adopt appropriate standards and strategies to enable Enstar to meet these aims. This document sets out our requirements for all vendors.

## LEGAL AND REGULATORY

All vendors shall undertake their business in accordance with any legal and regulatory requirements in each jurisdiction in which they operate. This shall include:

### ***Sanctions***

Vendors are prohibited from undertaking any business with parties sanctioned by OFAC, the United Kingdom, the European Union, or Australia.

### ***Bribery***

Vendors shall not receive, or make, any payments, whether in cash, tangible assets, services, or other benefits-in-kind, to procure or obtain services at favourable rates or other business advantage. Receipt or provision of any form of bribery or facilitation payment is strictly prohibited.

### ***Money Laundering***

Vendors shall maintain adequate procedures to prevent and detect suspicious activities which may be involved in the laundering of money or terrorist financing. Vendors shall take appropriate steps to satisfy themselves of the identity of parties with which they undertake business.

### ***Data Protection***

Vendors shall take appropriate steps to protect data which they hold, whether on behalf of Enstar or their other clients. Vendors shall not retain or use information for purposes other than for which the information was collected.

Vendors are prohibited from selling any personal, confidential, or other information which they may have access to through their relationship with Enstar.

### ***Information Security***

Vendors shall employ appropriate technological safeguards to minimise the risk of unauthorised access to their systems.



## HUMAN RIGHTS

Enstar advocates the fair treatment of all individuals, including staff and contractors, throughout its supply chain. Enstar requires all vendors:

- To prohibit discrimination on the basis of race, colour, gender, sexuality, nationality, language, religion, political or other opinion, including the provision of equal pay and working conditions;
- To prohibit any activity that may support or involve slavery or human trafficking, and to take appropriate steps to ensure that other firms involved in their supply chain do not support any such activity;
- To prohibit the use of child labour: when employing workers over the age of 15 (or 14 where the law of the country permits) and under the age of 18, vendors must ensure that such employment is in accordance with the relevant law and must provide adequate protection against any conditions that may be hazardous to the health and safety of young workers.
- To pay a fair minimum wage: to provide wages and benefits that meet or exceed the requirements of local law, the legal minimum wage, the prevailing industry wage, or the wage negotiated in an applicable collective agreement, whichever is higher.
- To adopt reasonable limitation of working hours and provision of periodic holidays with pay.

## ENVIRONMENT

Enstar is acutely aware of the impact firms may have on the environment and the need to minimise energy usage, travel, and production of non-recyclable waste. Enstar endeavours to adopt environmentally-friendly procedures to support a healthy environment, such as:

- Promoting the use of remote access, online meetings to minimise business travel;
- Promoting a paperless environment where possible, including employing electronic signatures for contracts and agreements;
- Utilizing low energy and motion-sensitive lighting;
- Minimizing water usage.

Enstar encourages its vendors to similarly develop and implement environmentally-friendly standards and procedures wherever possible.

## SOCIAL RESPONSIBILITY

Enstar is committed to supporting the communities it operates in, supporting staff in charitable giving initiatives, corporate/community workdays, education partnerships, and work experience opportunities. Enstar encourages its vendors to similarly build relationships with their local communities and contribute to the economic and social development of their localities.



## RELATED POLICIES

Vendors should be cognizant of Enstar's other corporate policies maintained on its website, [www.enstargroup.com](http://www.enstargroup.com), including:

- Anti-Slavery and Human Trafficking Policy Statement
- Enstar Code of Conduct
- Privacy Policy
- Whistleblowing Policy

## VENDOR PERFORMANCE MANAGEMENT

Enstar expects vendors to communicate this Vendor Code of Conduct to all those involved in the relationship with Enstar. Enstar reserves the right to validate vendors' compliance with this Vendor Code of Conduct, through the risk-based use of auditors, questionnaires, or other means, to confirm the accuracy of assertions and responses provided by vendors.

Where vendors are unable to meet any of the requirements of this Vendor Code of Conduct, they are expected to communicate this to Enstar, including reasons why such provisions are unable to be met.

Enstar may terminate relationships where vendors' behaviour does not meet the non-discriminatory, ethical, legal or regulatory requirements of this Code.

## OVERSIGHT

This Vendor Code of Conduct is supported by the Board of Enstar Group Limited and each of the boards of its subsidiary entities.

**Date last Approved:**

July 2021

