

REF:GDP/COC/09032024

REV:9th March 2024

Code of Conduct for Third Party dealing with the Trust:

- 1. Third parties are expected to act honestly and with integrity and to comply with the provisions of the applicable laws and regulations of the jurisdictions in which they operate.
- 2. Third Parties must never pay or offer anything of value, directly or indirectly, to any official or private individual with the intent to induce an act or decision by the recipient. These payments can take the form of cash, gifts, travel, lodging, entertainment or any other type of expenses.
- 3. Third Parties are expected to compete fairly and legitimately and are responsible for complying with all applicable laws designed to preserve the competitive market system.
- 4. Third Parties must treat all others, including Trust's employees and their own employees, with dignity, professionalism and respect. This means complying with applicable laws prohibiting forced or involuntary labor, child labor, human trafficking and slavery. They must also abide by all applicable wage and labor laws and refrain from any discrimination based on race, religion, age, nationality, skin color, gender, gender identity, disability, pregnancy, marital status, political affiliation, military status, sexual orientation or any other characteristic protected under applicable law.
- 5. Third Parties to comply with all applicable environmental laws and regulations. They are also expected to maintain a safe and healthy work environment for their employees and comply with all applicable workplace safety regulations.
- 6. The Trust will not tolerate fraudulent or dishonest business activities. Third parties must not engage in any fraudulent activities, including, but not limited to: theft, embezzlement or misappropriation of the Trust's funds or property; forgery or alternation of any document or part thereof, falsification, misuse or unauthorized removal of company records; false representation or concealment of information that is designed to result in the Trust obtaining a benefit to the detriment of others.



- 7. Third Parties should comply with all applicable laws, regulations, and standards related to privacy and data protection. Third Parties will only access, store or process personal data provided by the Trust in connection with a legitimate business purposes and will only use personal data as necessary for such legitimate business purpose.
- 8. Third parties must use Trust property (as defined below) responsibly and solely for authorized business purposes and must ensure that the Trust property is returned to the Trust upon termination of contract as appropriate or upon request. Trust property includes the equipment, supplies, intellectual property (including the Trust's name), records, documents, and other assets owned by the Trust. The Third parties who are using the Trust's hardware, software, website, e-mail, telecommunications, internet access or other systems that support and host the network of the Trust are expected to abide by the Trust's guidelines with respect to the proper use of those facilities.
- 9. All Third Parties are expected to maintain accurate, complete and reliable financial and business records in connection with all transactions with the Trust.
- 10. Where Third Parties are allowed under the terms of their contract to subcontract work or services to other third parties, we expect those sub-contractors to also comply with the requirements of this Code. Relationships with Third Parties will normally be subject to binding contractual obligations in relation to issues including data protection and confidentiality
- 11. Third Parties must avoid situations that may involve a conflict or the appearance of a conflict between their personal interests and the interests of the Trust. These situations may compromise a Third Parties' ability to act objectively with respect to the Trust. The Third Parties to report any potential conflicting situations to the Trust. This includes, but is not limited to, any close personal or family relationships with employees of the Trust.
- 12. Third Parties that become aware of any violations of this Code by any individual, including any employees, contractors or agents of the Trust, shall immediately report the violation to the Trust.



Name of the firm:	Contract reference: