



Supplier Code of Conduct (“Code”)

## Contents

Preamble.....	3
Environment .....	4
Human Rights & Decent Working Conditions.....	4
Occupational Health & Safety.....	6
Fair Business Practices.....	6
Sustainable Procurement.....	8

## Preamble

AVEVA prioritises ethical business practices and sustainability in its business dealings and recognises that it is core to our business success. We are taking actions to embed ethical business practices and sustainability into our operations, culture, and core business strategy. We are committed to leading on ethical and sustainable innovation and working in partnership with others to make a more just, net-zero world a reality for the next generation. We manage sustainability through the lens of [our technology handprint, operational footprint, and inclusive culture](#), and seek to drive positive change across our entire value chain working closely with our suppliers and business partners.

This Code describes the ethical business practices and sustainability expectations for AVEVA's suppliers and is applicable to AVEVA's providers of goods and services, independent contractors, employment agencies providing temporary and permanent workers, contract labour providers, and technology licensors ("Suppliers"). Suppliers are expected to communicate this Code to their own suppliers and third-party partners and are encouraged to monitor compliance.

In alignment with the [United Nation's Guiding Principles on Business and Human Rights](#), this Code's provisions are derived from and respect internationally recognised standards, including the [United Nation's Universal Declaration of Human Rights](#), the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#), and the [Paris Climate Accords](#).

At a minimum, AVEVA requires Suppliers to operate in full compliance with the laws, rules, and regulations of the jurisdictions in which they operate including any applicable international laws and regulations. This Code also encourages Suppliers to go beyond legal compliance to advance social and environmental goals, and business ethics drawing upon internationally recognised standards.

In no case should complying with this Code violate any local laws or regulations in the Supplier's jurisdiction. However, in the case that there are discrepancies between this Code and local law, AVEVA defines compliance as meeting the strictest requirement, whilst maintaining compliance with applicable laws at all times.

Suppliers should establish an ongoing process to assess their organization's understanding of this Code. Whilst AVEVA expects all Suppliers to self-monitor and demonstrate compliance with this Code, the Supplier may be subject to assurance and verification activities by AVEVA, including, but not limited to, self-assessment questionnaires, document requests and on-site audits.

AVEVA asks all Suppliers to review their own operations, adopt ambitious targets, and enact bold action in all areas mentioned in this Code. **Your commitment and action on these areas are a prerequisite to being one of our suppliers.**

## Environment

AVEVA is committed to protecting the climate and environment. We have set ambitious Green House Gas (GHG) emissions reduction targets that have been validated by the [Science Based Targets initiative](#) and we are dedicated to advancing environmental wellbeing throughout our value chain. AVEVA expects Suppliers to implement appropriate management systems, organisational structures, and procedures to move toward the goals of [Paris Climate Accord](#), assess environmental risks, implement adequate controls to mitigate impact, and maintain environmentally responsible business practices.

### Key Supplier Expectations:

- **Comply with Environmental Regulations**

Suppliers must identify and adhere to all applicable legal environmental requirements. This includes ensuring that all relevant permits, licences, and registrations are obtained and kept up to date; meeting all prescribed performance thresholds; monitoring all regulated discharges; and submitting all required returns and filings in a timely manner.
- **Address Climate Change & Reduce GHG Emissions**

Suppliers should quantify their own GHG emissions and upon request, provide company-wide GHG emissions data to AVEVA. Suppliers must also adopt ambitious emissions targets to push their own operations and their supply chain to become carbon neutral and eventually net zero, in line with 1.5°C warming described by the [Paris Climate Accord](#). Suppliers' climate policies should go beyond energy efficiency measures, by including targets for investments in renewable energy sourcing and encouraging innovation and impact at scale through measures such as supply chain engagement.
- **Prevent Environmental Hazards and Pollution**

Suppliers should have in place their own management systems, to identify, manage, communicate, and reduce the impact of any environmental hazards created by their operations. This includes any impacts resulting from pollution, non-GHG air emissions, effluent discharge, waste disposal, and hazardous substances.
- **Develop Measures to Conserve Resources**

Suppliers must have in place their own management system to identify, manage, and reduce their use of natural resources. This includes efforts to promote circular economy principles, as defined by the Ellen Macarthur Foundation, and ensure the responsible recycling and disposal of any solid waste.

## Human Rights & Decent Working Conditions

AVEVA is committed to upholding international human rights and, at a minimum, those expressed in the [International Bill of Human Rights](#) and the principles concerning fundamental rights set out in the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#). We adhere to the principles set out in the [United Nations Guiding Principles on Business and Human Rights](#) and have a zero-tolerance approach to modern slavery, as outlined in our [Anti-Slavery and Human Trafficking Statement](#) and [Business Conduct Guidelines](#). Suppliers must provide decent working

conditions, and ensure that all workers including temporary, migrant, student, contract, and indirect employees are treated with dignity and respect. AVEVA expects Suppliers to uphold these requirements for their own suppliers.

#### **Key Supplier Expectations:**

- **Child Labour & Young Workers**

As defined in the International Labour Organization core conventions and the Universal Declaration of Human Rights, Suppliers must not employ the use of child labour in any form. In this context, “child” refers to any individual under the age of 15, or under the legal minimum age defined by local law, whichever is higher. If Suppliers employ any young workers (aged 15-18 years), Suppliers must adopt appropriate safeguards to prevent exposure to hazardous working conditions including night shifts and overtime. If Suppliers employ any students or interns as part of educational trainings, legal minimum age criteria must be respected.

- **Freely Chosen Employment**

Suppliers must not employ anyone against their will. Forced labour, bonded (including debt bondage) labour, involuntary prison labour, and any other forms of coerced labour must not be used by Suppliers in any capacity. Suppliers must ensure that all employees have basic liberties, dignity, and freedom of movement, including the freedom to leave their employment at reasonable notice without any penalty or obstruction. Upon hire, all employees must be provided with clearly written contracts in a language that they are able to understand. Suppliers, and any agent or intermediary, must not withhold original documents or worker wages from any worker, including migrant workers.

- **Working Hours and Time Off**

Suppliers must ensure that working hours, including overtime, do not exceed applicable legal requirements or surpass sixty hours per week. All overtime performed must be voluntary and all workers must be provided at least one day off every seven days.

- **Freedom of Association**

Suppliers must respect the rights of all workers to form and join trade unions of their own choosing, bargain collectively, and engage in peaceful assembly.

- **Compassionate Treatment**

Suppliers must not use corporal punishment, disciplinary measures, or any other behaviour which violates the dignity, liberty, or basic human rights of its workers. Any behaviour, including gestures, language, and physical contact that is sexual, harassing, coercive, threatening, abusive, or exploitative is prohibited.

- **Non-discrimination**

Suppliers must not discriminate or harass their workers on the basis of race, colour, creed, age, gender, ethnicity, religion, marital status, pregnancy, disability, or veteran status or any other characteristic protected by applicable laws and regulations in any of their hiring or employment practices.

- **Access to Remedy**

Suppliers must have processes in place to ensure that any company stakeholder including employees, business partners, suppliers, contractors, and members of civil society have the opportunity to raise a concern without fear of retaliation. The Supplier's grievance processes must guarantee the confidentiality, anonymity, and protection of the stakeholder. Suppliers should also encourage their workers to use the [AVEVA Speak Up Portal](#) if they wish to raise a concern directly with our business.

## Occupational Health & Safety

Suppliers must provide a safe and healthy work environment for all employees and integrate health and safety management practices into their operations in accordance with applicable laws and regulations and industry practices. These practices should include conducting occupational health and safety risk assessments, implementing adequate hierarchy of controls, and clearly communicating and training workers on required practices. Recognised standards such as the [International Organization for Standardization 45001](#) and the [International Labour Organization's Guidelines on Occupational Safety and Health](#) can be used as a reference.

### Key Supplier Expectations:

- **Unsafe Work**

Suppliers must ensure workers are aware of any inherent risks involved in their work. Workers shall have the right to refuse unsafe work and report unhealthy working conditions without fear of repercussions.

- **Mitigating Hazards**

Suppliers must provide workers with appropriate personal protective equipment free of charge and must properly maintain physical guards, interlocks, and barriers where machinery presents an injury hazard to workers. Where relevant, Suppliers must provide workers with reasonable ergonomic accommodations.

- **Food and Housing**

When provided by the Supplier, housing facilities and food must be maintained in hygienic conditions in accordance with local laws and regulations.

## Fair Business Practices

AVEVA expects both its employees and Suppliers to uphold the highest standards of business ethics in all of their endeavours. If a Supplier witnesses an AVEVA employee failing to uphold ethical business standards, including as outlined in our [Business Conduct Guidelines](#), the Supplier is required to report the instance to AVEVA and may do so confidentially via the [AVEVA Speak Up Portal](#). All Suppliers must have in place policies and procedures to ensure fair business practices and must comply with all applicable laws and regulations, and ethical requirements in connection with any and all business relating to AVEVA. These include but are not limited to:

- a) all applicable trade and economic sanction laws, regulations, embargoes or similar restrictive measures in any jurisdiction, including all applicable international and national export laws, regulations, orders, decrees, and lists, and any other laws relating to export control;
- b) all applicable anti-money-laundering laws and laws relating to terrorist funding;
- c) all applicable tax laws (including laws relating to duties, levies and any other form of compulsory contributions);
- d) all applicable laws relating to bribery and corruption, including, but not limited to, the [U.S. Foreign Corrupt Practices Act](#) and the [U.K. Bribery Act 2010](#).

#### Key Supplier Expectations:

- **Anti-corruption and Bribery**

Suppliers must adopt a zero-tolerance policy for any form of bribery, corruption, extortion, or embezzlement. Suppliers must uphold ethical standards at every level of their business, including their relationships, practices, purchasing, and operations. Corrupt practices include promising, offering, authorising, giving or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Suppliers must not offer, promise or give any gratuities or rewards in connection with any business transactions with the intent to improperly influence or induce the improper performance of any activity or function by any person, or to reward any person for improperly performing any activity or function or procuring improper performance of any activity or function by another person. These prohibited activities apply to government officials and to anyone working in the private sector.
- **Conflicts of Interest**

Suppliers must in good faith disclose to AVEVA any apparent or actual conflicts of interest regarding its relationship with any AVEVA employees or any financial interest in AVEVA or its related parties.
- **Anti-trust**

AVEVA expects all Suppliers to compete independently in the market and follow all applicable anti-trust and competition laws. Suppliers must never agree, formally or informally, with any actual or potential competitor(s) to align or coordinate commercial behaviour. All Suppliers are expected to implement measures to ensure full compliance with the antitrust and fair competition laws that govern the jurisdictions in which they conduct business.
- **Insider Trading**

Insider trading is prohibited. Supplier's may have access to non-public information relating to AVEVA. Suppliers (including any supplier employees) must not buy or sell securities when in possession of information that is not available to the investing public and could influence an investor's decision to buy or sell the security.
- **Transparency in Business and Reporting**

Suppliers must maintain up-to-date and accurate business and accounting records relating to all aspects of its business such as labour practices, health and safety practices, environmental

practices, business activities, corporate structure, financial accounting, tax filings, all in accordance with applicable laws and regulations and prevailing industry practices. Suppliers must disclose relevant business and accounting records to AVEVA, to allow AVEVA to assess Supplier's compliance with this Code.

- **Intellectual Property & Confidentiality**

Suppliers must respect intellectual property rights and ensure the use of, or transfer of, any technology or know-how is subject to proper legitimate authorisation. Suppliers must have measures in place to protect AVEVA confidential information, including AVEVA intellectual property, that may come into its possession from unauthorised disclosure or use. Suppliers must conduct its business in accordance with all applicable data privacy and information security laws and regulations. Suppliers must effectively manage the risk of counterfeiting and must have appropriate processes in place to protect AVEVA from receiving counterfeit products or sub-components.

- **Respect Ethics in Material Usage (Conflict Minerals)**

Suppliers must adopt a policy and exercise due diligence for the sourcing and chain of custody of conflict minerals including cobalt, tantalum, tin, tungsten, and gold in their products to assure that they are sourced in a way consistent with the [Organisation for Economic Cooperation and Development \(OECD\) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas](#).

## Sustainable Procurement

Suppliers must engage in procurement in a responsible manner. Suppliers are encouraged to engage socially and economically different categories of suppliers through inclusive sourcing processes that promote equal opportunity.