

Supplier Code of Conduct

Radancy

October 2024

Introduction

TMP Worldwide Advertising & Communications, LLC dba Radancy (with its affiliates, "**Radancy**") is committed to the highest standards of integrity and social responsibility and Radancy expects all suppliers providing products and/or services to Radancy ("**Suppliers**") to make a similar commitment. This Supplier Code of Conduct (the "**Code**") describes Radancy's expectations of how its Suppliers conduct business. Suppliers must agree to act in accordance with the Code and comply with applicable laws and regulations within the geographies where they operate, including being open and cooperative with the regulators enforcing such laws. In instances where expectations outlined in the Code differ from local laws, Suppliers must follow the Code within the bounds of applicable local laws. The Code reflects Radancy's values and sets forth what is expected of its Suppliers.

Radancy may actively engage with individual Suppliers to encourage these practices and may consider these practices when making procurement decisions.

Supplier Code of Conduct

Ethics and Integrity

Radancy is committed to the highest ethical standards and compliance with all applicable laws, rules and regulations. Radancy emphasizes teamwork, dignity and mutual respect. Radancy requires Suppliers to adhere to the following standards:

Bribery and anti-corruption

Suppliers must never offer or promise any direct or indirect improper advantage to a third party, including arranging or accepting any bribe or kickback. In addition, Suppliers must fully comply with requirements of all applicable bribery and anti-corruption laws, including establishing and maintaining policies that prohibit bribery and other improper payments to public officials consistent with the U.S. Foreign Corrupt Practices Act, similar laws in other countries, such as the UK Bribery Act.

Conflicts of interest

Personal business relationships must never influence Suppliers' business decisions. Suppliers must report any relationships that could interfere with its ability to act with total objectivity. Any potential Supplier conflict of interest must be immediately disclosed to Radancy.

Suppliers must refrain from offering or making any payments of money or anything of value (including kickbacks, favors, gifts, gratuities, entertainment, travel, political contributions, charitable donations or other business courtesies) to customers, government officials, political parties, candidates for public office, charities, or other business-related parties that could be considered to improperly influence business decisions. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, except in situations where there is an imminent threat to personal health or safety.

Gifts and entertainment

Suppliers must not offer, solicit or accept any gift to obtain improper advantages or influence for Supplier, Radancy (such as Radancy employees and their family members and associates) or any third party. Gifts include any benefit, fees, commissions, dividends, cash, gratuity, political contributions, services or any inducements.

Anti-Competition and Antitrust Laws

Suppliers must comply with anti-competition and antitrust laws which prohibit price fixing, colluding, or rigging bids with competitors, allocating customers or markets with competitors, or exchanging any pricing information with Radancy competitors.

Non-retaliation for reports of concern

Radancy expects Suppliers to have a policy and process for reporting workplace concerns. The policy and process should be transparent and understandable and should protect reporting and participating individuals from retaliation.

Data Privacy and Security

Radancy requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information.

Confidential assets and information

Suppliers must protect Radancy's and its customers' confidential assets and information. Suppliers must design and maintain processes to provide appropriate protections for this information.

Personal information and privacy

Radancy requires Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of Radancy may only be used, accessed and disclosed as permitted by the agreements between Radancy and Supplier.

Inclusion and Diversity

Radancy fosters an inclusive culture and believes diversity should be celebrated and discrimination of any form should not be tolerated. Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, harassment and retaliation.

Radancy believes in providing equal opportunity in all aspects of employment and we expect the same from its Suppliers. Radancy's policies prohibit unlawful discrimination and harassment in the workforce and workplace on the basis of race, religion, color, national origin, ancestry, sex (including gender, gender expression and gender identity), pregnancy, childbirth and related medical conditions, age, physical or mental disability, medical condition, genetic information, weight, height, marital status, caregiver status, sexual orientation, hairstyle, citizenship status, AIDS/HIV status, political activities or affiliations, military or veteran status, credit history, unemployment status, status as a victim of domestic violence, assault or stalking or any other characteristic protected by federal, state or local law.

Further, Radancy is committed to identifying and developing qualified diverse Suppliers from underrepresented groups, including companies owned and operated by minorities, women, military veterans, disabled veterans, people with disabilities and members of the LGBTQ+ community.

We encourage Suppliers to have in place programs and initiatives to advance diversity, equity and inclusion within their business and to provide transparency regarding workforce representation as appropriate to their business and the countries in which they operate.

Employment And Working Conditions

Radancy supports the United Nations Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Radancy strives to adhere to the principles set forth in these standards and expects its Suppliers to do the same.

Modern slavery / human trafficking

Radancy prohibits its Suppliers from using slave, forced, bonded, indentured or prison labor, involvement in any human trafficking, or child labor under any circumstance in its operations and for all entities in its supply chain(s), including those involved in the recruitment, selection and hiring of workers. Suppliers are expected to fully comply with the applicable legal requirements of slavery, forced labor and human trafficking laws (e.g., UK Modern Slavery Act 2015) and expects Suppliers to enact practices to ensure compliance with such laws.

Child Labor

Radancy does not tolerate child labor in any form. Suppliers must act in compliance with all laws regulating minimum working age for each position, including any laws pertaining to the employment, apprenticeships and internships of youths and students.

Human rights

Radancy does not tolerate human rights violations in any form. Radancy expects Suppliers to treat employees with dignity and respect and to enact practices to maintain a respectful and safe workplace. Radancy expects Suppliers to not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, power abuse, bullying or harassment of any kind.

Employment laws

Suppliers must comply with all applicable local wage and labor laws, including with respect to regulations that pertain to working hours, rest day requirements, benefits and wages (such as minimum legal wages). Radancy further expects Suppliers to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch and outsourced labor shall be in accordance with local law. In addition, Radancy expects Suppliers to maintain a workplace that is free from unlawful discrimination and harassment for all employees.

Wellbeing, Health and Safety

Radancy expects Suppliers to implement sound health and safety practices across business operations and provide employees with a safe and healthy working environment. Suppliers must comply with all applicable health and safety laws and regulations. Radancy expects Suppliers to adopt practices to minimize health and safety risks, support accident prevention and ensure a safe workspace for all workers, including by developing and implementing health and safety management practices in all aspects of their businesses, including ensuring that Supplier employees are provided with appropriate, well-maintained, personal protective equipment and health and safety training, such as safe work practices and emergency preparedness in compliance with all applicable laws and regulations of the countries we serve.

Environment

Radancy expects its Suppliers to comply with all applicable laws and regulations in relation to environmental protection, including but not limited to maintaining all required environmental permits, regulatory approvals and registrations. The Supplier shall comply with environmental laws and regulations and shall also implement measures that help protect the environment: fight against climate change and conservation of natural resources and biodiversity. The Supplier must minimize the negative environmental impacts of its products and services throughout their life cycle. The Supplier is encouraged to implement an Environmental Management System based on international standards such as ISO 14001 or a similar standard.

Additionally, Radancy encourages Suppliers to apply a conservation-minded approach to their business activities, including their supply chains. This includes, but is not limited to, undertaking efforts that encourage:

- Efficient use of natural resources (e.g., water, fossil fuels, minerals, and virgin forest products).
- Minimizing waste by implementing strategies to reduce, reuse and recycle (in that order) materials prior to disposal whenever possible.
- Measuring and reporting greenhouse gas emissions (Scopes 1, 2 and 3) as well as the greenhouse gas emissions that are directly attributable to the products and/or services being provided to Radancy as may be applicable.
- Setting greenhouse gas emissions reduction goals and demonstrating meaningful progress towards those goals, such as improving energy efficiency and/or using cleaner sources of energy.

Compliance with the Code

Violations

Suppliers are required to promptly report to Radancy any legal violations or violations of the Code or any other Radancy policy. Suppliers must promptly forward to Radancy, if permitted by law, any subpoenas, regulatory requests, media inquiries or other third-party requests concerning Radancy.

To report a Radancy Supplier please email legal@radancy.com (monitored during business days and hours). Radancy will keep the reported information confidential, provided it does not hinder any investigation and is permitted to do so by law.

Radancy's Rights

Radancy reserves the following rights to ensure and enforce Suppliers' compliance with the Code.

Supplier selection

Radancy will evaluate Suppliers' compliance with the Code during the Suppliers' evaluation and selection process or from time to time.

Supplier assessment

During the Supplier certification process, Suppliers may be required to complete a self-assessment questionnaire on compliance with the Code. Suppliers may be asked to re-affirm compliance with the Code periodically.

Social/Environmental/Compliance Audits and Monitoring

Radancy and/or its authorized representatives may have the right to conduct audits, including on-site inspections, and to conduct questionnaires and interviews with workers selected at the Supplier's premises, sites and/or other locations where work is performed on the Supplier's behalf.

Violations and termination

Supplier shall ensure that its subcontractors, if any, comply with the Code and Supplier acknowledges that it is responsible for any of its subcontractors' Code violations. In the event of non-compliance or violation of the Code, Radancy may give the Supplier a reasonable opportunity to respond with proposed corrective actions, unless the violation is severe or incurable or there is a violation of applicable law. Radancy may suspend or terminate its relationship with the Supplier and/or disclose the matter to the appropriate authorities if there is a violation of applicable law.

Order of Precedence; Changes to the Code

The Code does not supersede any applicable law or any terms in an agreement between Radancy and Supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls. Radancy reserves the right to update or change the Code requirements immediately upon notice to the Supplier.