



14721 Califa St.  
Los Angeles, CA 91411

# **Supplier Code of Conduct**

*(Last updated August 8, 2023)*

## **Introduction**

At FloQast, we are committed to conducting business ethically and legally across all our global operations, and we expect our business partners to share in this commitment. Our Supplier Code of Conduct (the "Supplier Code") sets out expectations for our business partners in the areas of business integrity, labor practices, anti-corruption, health and safety, diversity and inclusion. FloQast is committed to protecting human rights and strives to develop environmentally and socially sustainable chains of responsibility within our sphere of influence. FloQast expects the business partners that we work with, including all vendors, consulting firms, staffing agencies, agency temps, partners and licensees ("Suppliers"), to adhere to the high standards set forth in this Supplier Code as a condition of doing business with FloQast. If you suspect illegal or unethical practices, it is your responsibility to report it to FloQast and local authorities.

## **Compliance with the Supplier Code**

FloQast requires Suppliers and any subcontractors, providers, or agents that they use to abide by all applicable laws, regulations and other legal requirements in jurisdictions in which they operate, and the Supplier Code.

## **Reporting Misconduct**

Need Help? Questions for FloQast Procurement or if you believe that a Supplier or an employee of a Supplier is not meeting the standards of this Code, please reach out to: [ethics@floqast.com](mailto:ethics@floqast.com).

## **General Rights of Workers**

FloQast acknowledges and respects basic and fundamental human rights. Suppliers shall treat workers with dignity and respect as understood and defined by applicable law. Suppliers shall make all relevant information about their employee's rights easily accessible to the employees.



## Humane Treatment

FloQast requires its Suppliers to ensure there is no inhumane treatment or threat to workers, including any sexual harassment, sexual abuse, harassment, corporal punishment, or mental or physical coercion of workers. Suppliers must treat all workers with dignity and respect.

## Health and Safety

We expect Suppliers to provide all employees with safe and healthy working conditions that comply with local laws. Safe and healthy working conditions include offering emergency training and resources, practicing industrial hygiene, and enacting equipment safety initiatives, as appropriate. Suppliers should take proactive measures to prevent workplace hazards.

## Labor Practices

FloQast recognizes that our business decisions have a direct impact on people and communities. We are committed to enacting fair labor practices and expect Suppliers to share that commitment.

## Fair Compensation

FloQast requires Suppliers to comply with the local minimum wage laws and benefits requirements. Additionally, Suppliers should not unlawfully use deductions from wages as a disciplinary measure.

## Working Hours, Rest Days, and Compensation

FloQast expects its Suppliers to ensure their workers have reasonable work schedules that comply with local laws. While it is understood that overtime may be required, FloQast expects Suppliers to carry out their services in a way that promotes humane and productive working conditions. Suppliers shall comply with local laws regarding payment and working hours, including overtime, rest days and public holidays. Compensation paid to employees shall comply with all applicable local wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.

## Freedom of Association

Open communication and direct engagement between workers and management are effective ways to resolve workplace and compensation issues. We seek Suppliers who respect employees' right to freedom of association and collective bargaining in accordance with local laws. Suppliers will not unlawfully discriminate in employment decisions against or engage in threatening or harassing behavior towards workers because of their affiliation with worker groups.



## Child Labor

We do not tolerate the use of underage labor and will not work with suppliers that utilize underage workers. Suppliers shall adhere to minimum age provisions set forth in local laws and regulations and should not use workers that are under the legal age for employment. Suppliers may employ workers that are younger than 18 years of age, if they are legally employed in accordance with the law of the country in which they are working. Suppliers must monitor any and all employees under the age of 18 to ensure they are performing age-appropriate tasks, in age appropriate working conditions, and are protected from any type of labor likely to jeopardize their health or safety.

## No Forced Labor or Human Trafficking

FloQast condemns human trafficking and forced labor and will not work with Suppliers who engage in these practices. Suppliers must ensure that they do not use involuntary prison labor, or forced, bonded, or indentured labor, and do not employ anyone against their will. We expect Suppliers to adhere to all applicable anti-modern slavery and human trafficking laws, including the UK Modern Slavery Act 2015. Workers shall not be required to relinquish control of identity or immigration papers (including but not limited to passports, drivers' licenses, or work permits). Additionally, Suppliers must ensure that all work is voluntary and that their employees are free to resign their employment in accordance with applicable law.

## Respect, Dignity, and Non-Discrimination

Suppliers will not discriminate in screening, hiring, or employment practices based on race, color, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, covered veteran status, hair style or body art. Suppliers will not permit harassment, sexual harassment, corporal punishment, inhumane treatment, bullying, and threats of physical violence. Suppliers shall provide a working environment that is free of abusive, violent, threatening, disruptive, demeaning, and other improper behavior.

Suppliers will not inquire about potential workers' criminal histories on employment applications or before initial interviews, or, if no interview is conducted, before making conditional offers of employment. FloQast also expects Suppliers to refrain from disrespectful, unprofessional, harassing, defamatory actions and any activities that are prohibited by law or the terms of use on social media platforms.

## **Business Practices and Ethics**

Suppliers must not engage in any unlawful activity in conducting business for or on behalf of FloQast, nor should Suppliers instruct others to do so.



## Ethical Conduct

Suppliers must adhere to the highest standard of ethical conduct, respect all local laws, and not engage in any form of illegal or improper business practices such as extortion, fraud or any other act which could enable corruption in any manner. Suppliers shall comply with all legal requirements regarding accurate marketing and sales, and shall act with integrity when handling competitive or proprietary information. Suppliers should not engage in false or misleading accounting practices and should not use fictitious, inaccurate or misleading documents to support transactions related to business with FloQast. Suppliers should conduct appropriate screening and background checks of its service providers in accordance with applicable laws to ensure its agents reflect these high standards of ethical conduct.

## Fair Dealing

We expect Suppliers to comply with all applicable laws and regulations regarding fair competition and antitrust.

## Anti-Corruption

FloQast is committed to conducting its business in compliance with all laws prohibiting bribery and other corrupt practices. Suppliers must comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, equivalent laws of Supplier's jurisdiction, and all applicable anti-corruption regulations and international anti-corruption conventions.

## Conflicts of Interest

A "conflict of interest" occurs when personal or professional interests or activities interfere with, or appear to interfere with, the best interests of FloQast or Supplier.

We trust that Suppliers will:

- Avoid conflicts of interests and situations that may have the appearance of a conflict of interest.
- Disclose to FloQast any material transaction or relationship that reasonably could be expected to give rise to an apparent or actual conflict of interest regarding its relationship with FloQast.

## International Trade and Export Controls

FloQast expects Suppliers to comply with all applicable import, export, customs, sanctions, embargoes, boycott and other trade compliance laws and regulations.

## **Data Information and Privacy**

FloQast is committed to protecting the privacy and security of data in our developer ecosystem, and of our customers and users. We expect Suppliers to comply with all



applicable data privacy laws and regulations when processing the personal or identifying information of FloQast and FloQast's employees, customers and end users, workers, and suppliers.

A comprehensive list of all recipients (including supplier's entities, sub-processors and onward transferees) of FloQast personal data will be made available to FloQast. This will include all locations to which personal data is transferred or in which personal data is processed (e.g., accessed/viewed from). Updates to this list will be communicated to FloQast in a timely manner.

Suppliers must implement measures to protect the personal data received from FloQast. These measures include

- Technical measures, e.g., encryption (during transit/at rest/while in use), obfuscation, pseudonymization, and penetration testing;
- Organizational measures e.g., internal policies (data protection impact assessments, security policies and procedures), and organizational methods or standards, controls and audits; and,
- Administrative measures, e.g., internal training, access control, confidentiality rules.

Suppliers must require its sub-processors to implement the same technical, organizational and administrative measures as the supplier to ensure that the equivalent level of protection of personal data is transferred to all sub-processors.

To reduce or eliminate the risk that the personal data suppliers receives from FloQast is not or will not be accessed by public authorities, suppliers must adopted written internal policies and procedures for responding to or challenging requests or demands for access to or disclosure of personal data received by supplier from FloQast, and for informing customers and data subjects of such requests or demands. Suppliers must require from sub-processors notification of requests/demands for disclosure of or access to personal data shared with those sub-processors, and that sub-processors will resist/challenge requests where appropriate.

## Intellectual Property and Confidential Information

Suppliers may not share, disclose or use FloQast's intellectual property, confidential information, or any other proprietary or non-public information that the Supplier acquires through its engagement with FloQast except as provided for in the applicable contract with FloQast or as provided by express written consent by FloQast.

## Monitoring and Auditing

We expect that every Supplier will:

# #FloQast

- Monitor its own operations through appropriate due diligence, audits or other activities.
- Maintain honest and accurate accounting and business records that comply with all relevant legal and regulatory requirements.
- Comply with its agreement with FloQast including any permissions to review records or facilities.