



Template

IONX Supplier Code of Conduct

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1 Supplier Code of Conduct

This Supplier Code of Conduct applies to all individuals and entities who are providing services or products to [IONX Networks], or any of their affiliated companies (collectively the “**Suppliers**”). Adhering to this Supplier Code of Conduct is a condition of continued work with IONX Networks and is in addition to, not in lieu of, legal and contractual obligations or other professional obligations owed to IONX Networks. In the event that a Supplier has signed a contract with more stringent requirements than set out below, the more stringent requirements will govern. It is the Supplier’s responsibility to raise any questions it may have about this Supplier Code of Conduct with IONX Networks in a timely manner.

2 Compliance with Applicable Laws.

We expect our Suppliers to understand and follow all applicable laws and regulations in the jurisdictions in which they operate, particularly when conducting business for or on behalf of IONX Networks. In addition, Suppliers are expected to conduct themselves in an ethical manner and have appropriate policies and procedures, including appropriate internal controls in place, to comply with applicable laws, their contractual obligations to IONX Networks, and the requirements below.

3 Conflicts of Interest.

Suppliers must disclose any actual or potential conflicts of interest to IONX Networks as soon as the conflict is known. This includes any personal relationships between IONX Networks personnel and Supplier personnel or a Supplier engaging in work for a competitor of IONX Networks.

4 Anti-Corruption and Anti-Bribery.

IONX NETWORKS has a zero-tolerance policy for bribery and corruption in both the private and public sectors. Suppliers shall comply with all applicable in country anti-bribery, anti-corruption and anti-fraud laws and regulations including the UK Bribery Act (2010) and the United States Foreign Corrupt Practices Act (the “**FCPA**”). Suppliers must never offer or give anything of value that is designed or could appear to improperly or illegally influence the recipient. Any gifts or entertainment offered or given on behalf of IONX Networks must be reasonable and appropriate, comply with relevant laws, have a clear business purpose, and be supported by documentation.

5 Anti-Trust Compliance.

Suppliers shall comply with all applicable anti-trust laws, including but not limited to the UK Competition Act 1998.

6 Accurate Books and Records.

Suppliers must keep accurate books and records that accurately reflect any financial transactions related to IONX Networks, including written records of all expenses, gifts and entertainment given or received in relation to their engagement with IONX Networks. In the event of any suspected wrongdoing, IONX Networks may audit these books and records to ensure compliance with this requirement. Suppliers must never falsify documents or destroy any documents subject to a legal hold.

7 Security.

All Suppliers must implement appropriate technical and organization measures to ensure the security of IONX Networks information and the confidential information of any third party which the supplier learns in the course of its work for IONX Networks.

Business Continuity

Where appropriate to the services provided to IONX Networks, Supplier shall maintain a documented emergency response and disaster recovery plan to guarantee the protection of data and intellectual property and the business continuity of the services and/or goods being provided. Suppliers shall review and test their business continuity plan to ensure it is fully compliant with industry best standards.

8 Privacy

Suppliers must comply with all applicable data privacy laws related to the personal information of any individual that they process in the course of working with IONX Networks. This includes respecting the privacy rights of data subjects, ensuring personal information is adequately protected via security measures, immediately notifying IONX Networks in the event of any data breach, not transferring personal information outside its original jurisdiction without adhering to applicable data transfer requirements, and never, absent specific contractual provisions, selling or sharing the personal information of any individual.

9 Respect for Workers

Ensuring Human Rights, Health & Safety, Protection Against Harassment and Discrimination, and Compliance with Labour and Modern Slavery Laws. IONX Networks is committed to ensuring that all workers are treated with respect and dignity. IONX Networks will only work with Suppliers who adhere to these minimum standards which must be followed at all times:

- Identify and eliminate any slavery in their business and supply chains, provide fair and competitive compensation and act ethically and with integrity in their business relationships;
- Workers must be free to terminate their employment at any time (notice may apply);
- Compliance with all applicable health and safety laws;
- All applicable labor laws and regulations, including those related to wages, working hours and rest breaks;
- A worker's identification or travel documents must not be held by a Supplier any longer than needed (i.e., for initial administrative processing requirements);
- Workers must not be required to pay or repay recruitment fees;
- Any deduction of wages to a worker must be in compliance with applicable laws and regulations and be clearly documented;
- Workers must be allowed freedom of movement, including the ability to leave the working facilities, or, if applicable, any worker housing;
- Workers must receive a written agreement setting forth the terms of their employment in a language they can understand and be provided with a supervisor who is able to communicate with them in a language which they can understand;
- Prior to hire, all workers must provide proof of their age and, if the document shows or if there is a reasonable belief that a potential worker is under the minimum age of employment in the applicable jurisdiction, that worker must not be hired;
- In compliance with applicable laws, workers must be allowed to associate freely, bargain collectively and otherwise seek representation related to their working conditions or benefits; and
- Prohibitions on any harsh or inhumane treatment, bullying, intimidation or discrimination based on race, colour, age, sex, gender, gender identity or expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, or veteran status.

10 Environmental Protection and Compliance.

Suppliers shall comply with all applicable environmental laws and regulations and encourage the efficient use of energy, water and materials, natural resources, promote the protection of the environment, preserve biodiversity and seek to prevent pollution and other environmental harm.

11 Artificial Intelligence

When using large language model-based, artificial intelligence or machine learning technologies (collectively, “AI”), Suppliers must comply with all applicable laws and regulations as well as applicable sections of this Supplier Code of Conduct. This includes compliance with laws, regulations and policies relating to data protection and privacy, intellectual property, and anti-discrimination. Suppliers are ultimately responsible for all content produced with the assistance of AI. Suppliers must:

- Never input confidential information or personal data into any AI technologies;
- Obtain written approval from IONX Networks’ CLO before using AI technologies in the context of a project for which patent or copyright protection may be sought;
- Review any AI-generated content for bias and correct it as necessary;
- Carefully review AI-generated material for inaccurate or incomplete information and potential infringement of third-party rights;
- Be transparent with IONX Networks regarding use of AI technologies; and
- Immediately report security incidents or suspected breaches to IONX Networks’ CLO.

12 Import/Export Laws, Trade Sanctions, and Supply Chain.

Suppliers shall at all times comply with import and export controls laws and take steps to ensure that (i) no entity or person subject to United Nations, European Union, UK, US or other applicable sanctions laws and regulations (collectively the “**Sanctions**”) is involved in or unlawfully benefits from Supplier operations, including supply chain, and (ii) to prevent involvement in any transaction prohibited by applicable sanctions laws and regulations. Neither the Supplier nor any person or entity which owns or controls (directly or indirectly) the Supplier is shall be subject to Sanctions.