



**Supplier and Business Partner**

**Code of Conduct**

**MeDirect Group**



## Table of contents

1. Introduction .....	2
2. Scope and Purpose.....	2
3. Business Ethics and Compliance.....	2
4. Labor Practices and Work Environment.....	3
5. Environment Protection.....	4
6. Escalation.....	4
7. Document Review.....	5
8. Definitions.....	5

## 1. Introduction

MDB Group Ltd. (the “Group”, “MeDirect”) is committed to the highest standards of business conduct complying with all relevant laws and regulations, demonstrating business ethics and integrity as well as social responsibility in order to continue building a responsible and sustainable organisation based on sound values and ESG principles. The Group expects the same attitude from its business partners and suppliers.

## 2. Scope and Purpose

MeDirect Supplier and Business Partner Code of Conduct (the “Code”) sets the fundamental standards and principles expected from MeDirect suppliers and business partners with regards to:

- Business Ethics and Compliance
- Labor Practices and Work Environment
- Environment Protection

This code underpins sustainable procurement objective focused on fair trade, the lowest environmental impact and most positive social results.

Moreover, MeDirect performs during the selection/onboarding of key suppliers and business partners, where the expected spend equals or exceeds Euro 1 million, the ESG due diligence applying ESG questionnaire with the aim of favouring vendors with ethical, environmentally and socially friendly operations. In addition, during the monitoring and periodic reviews of the key suppliers and business partners, the CER and ESG factors are also analysed.

This Code applies to the suppliers and business partners of MeDirect Group and its group entities including MeDirect Bank (Malta) plc (“MeDirect Malta”) and MeDirect Bank NV/SA (“MeDirect Belgium”).

This document should be made available on the dedicated sustainability pages on the MeDirect Malta’s and MeDirect Belgium’s website respectively.

## 3. Business Ethics and Compliance

Suppliers and business partners should comply with all applicable laws, regulations, policies and local conditions standards in the countries in which they operate, produce or do business.

Competition should be based on quality, price, and service rather than unfair practices. Suppliers and business partners should apply antitrust laws and not engage in bribery, price fixing, or any other form of corruption or competitive harm to obtain or retain business such as gifts and entertainment, charitable donations, sponsorships, training; and hiring.



Suppliers and business partners should disclose any potential conflicts of interest, in particular those arising from business or personal relationships with MeDirect employees, clients, suppliers and business partners or other counterparties of the Group to avoid potential preferential treatment.

During the course of the business relationship suppliers and business partners may be informed that they are insiders and may possess inside information about MeDirect which is defined as precise non-public sensitive information which if made public would have a significant impact on the price of an investment, which a reasonable investor would use to make an investment decision. All suppliers and business partners, which have been notified by MeDirect of the status as insider, are prohibited from:

- i. trading in securities in relation to which inside information is held,
- ii. unlawfully disclosing inside information,

All the above, are considered as Market Abuse and are criminal offences subject to sanctions.

MeDirect expects its suppliers and business partners to ensure data protection and security with the highest standards complying with Data Protection laws, the Group's policies and procedures together with any contractual obligations. It includes personal information of the Group's employees and confidential information of the Group's clients and transactions.

Suppliers and business partners must respect the protection of patents, copyrights, and trademarks. It is mandatory to obtain permission from the Group's authorized persons or otherwise refrain from using them.

Provided products and services should include all the necessary information allowing its users to understand the scope and cost's structure acting fairly, honestly and transparently.

#### **4. Labor Practices and Work Environment**

Suppliers and business partners are required to respect and protect internationally recognized labor and human rights standards such as 'Universal Declaration [of] Human Rights' of the United Nations, as well as the 'International Labour Organisation's (ILO) Declaration of Fundamental Principles and Rights at Work' ensuring a workplace that is free from the violation of human rights.

The employment of young workers, minors who have reached the minimum age of employment and completed compulsory schooling, is allowed under strict conditions and in compliance with the ILO standards.

It is prohibited to use forced or compulsory labour including modern forms of slavery and any form of human trafficking. No employee may be compelled to work through force or intimidation of any forms.

Recruitment practises and working conditions, including payment of wages, benefits and working hours should comply with applicable laws and regulations.

Suppliers and business partners shall promote a work environment free from discrimination, harassment, bullying, sexual abuse and physical violence. Discrimination can be associated with an individual's race, colour, sex, national origin, ethnicity, age, religion, disability, marital status, pregnancy, sexual orientation, gender identity and expression, citizenship or any other characteristic protected by law.

It is expected to ensure safe and healthy working conditions to prevent occupational accidents, injuries and illnesses among the supplier's and business partner's employees caused by their work.

It is expected to respect the employees' freedom of association and collective bargaining without fear of reprisals.

## 5. Environment Protection

Suppliers and business partners should comply with all applicable laws and industry standards or guidelines regarding environmental protection in the countries in which they operate, produce or do business.

Production, material use and service delivery as well as transportation technology should consider sustainability principles such as the responsible use of natural resources, energy and waste generation to minimize carbon footprint, environmental impact and damage in all suppliers and business partners facilities.

## 6. Escalation

The supplier and business partners should immediately notify of any violations against this Code by contacting MeDirect Procurement and Supply senior manager or MeDirect business owner responsible for the relationship as well as implement corrective measures to eliminate any non-compliance.

MeDirect shall initiate an investigation to assess the nature, severity and potential impact on the suppliers or business partners and MeDirect business stability, reputation and (also future) liability/litigation risks. In doing so, MeDirect Procurement and Supply senior manager or MeDirect business owner responsible for the relationship shall consult, and where appropriate, report to the Head of Compliance, Head of Operational Risk and Head of Legal.

Where the violation in question is deemed to be significantly material the matter should be reported to the Group Board of Directors, without delay, who shall consider the matter and decide on the appropriate remedial measures to be taken including (where necessary) the termination of any commercial relationship with a supplier or business partner, or any other action considered necessary to resolve the violation.

## 7. Document Review

This Document shall be reviewed periodically to ensure its effectiveness, alignment and consistency with changing sustainability standards, stakeholder expectations and best practices.

## 8. Definitions

**CER** - climate and environment related risks

**ESG** - environmental, social and governance factors

**Child Labor** – work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development according to International Labour Organisation’s (“ILO”)