



BUSINESS RELATIONSHIPS

CODE OF CONDUCT



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THE PURPOSE OF THIS BUSINESS RELATIONSHIPS CODE OF CONDUCT (COC) IS TO ENSURE THAT PRODATA CONSULT'S BUSINESS RELATIONSHIPS, INCLUDING SUPPLIERS, PARTNERS AND CONSULTANTS, DEMONSTRATE RESPONSIBLE BUSINESS CONDUCT BY MANAGING ADVERSE IMPACTS ON THE AREAS COVERED BY INTERNATIONALLY AGREED PRINCIPLES FOR SUSTAINABLE DEVELOPMENT. AS PART OF OUR RESPONSIBILITY, WE REQUIRE OUR BUSINESS RELATIONSHIPS TO MEET THE SAME STANDARD THAT WE HAVE PLEDGED TO UPHOLD.

I. **THE GLOBAL STANDARD**

The areas covered by this CoC reflect the UN Global Compact principles. The requirement to manage risks of actual and potential adverse impacts is aligned with the minimum requirements in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD). Meeting the minimum standard for responsible business conduct as defined by the UNGPs/OECD is distinct from legal compliance: Business Relationships are always expected to comply with the laws where they operate.

ProData Consult expects all of our Business Relationships to adhere to the globally agreed minimum standard for responsible business conduct. ProData Consult reserves the right to introduce more specific additional requirements related to sustainable development, should specific circumstances warrant such focus.

II. **SCOPE**

The required management system shall, at a minimum, address adverse impacts on the human rights stated in the International Bill of Human Rights, including the core labour rights from the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work; significant adverse impacts on the external environment in relation to areas addressed by the Rio Declaration on Environment and Development, including the climate, as stated in the Paris Agreement; and adverse impacts on anti-corruption, as described in the United Nations Convention against Corruption.

III. **MANAGEMENT REQUIREMENTS**

Meeting the global minimum standard involves managing adverse impacts in relation to internationally agreed principles for sustainability. The following elements of a management system shall be met:

i. **Adopt a Policy Commitment**

The policy commitment of our Business Relationships shall:

- Be approved at the most senior level of their company;
- Be informed by experts in the UNGPs and OECD;
- Stipulate their expectations of employees and Business Relationships;
- Be publicly available and communicated both internally and externally; and
- Be embedded in all other operational policies and procedures throughout the company.

ii. **Establish and Maintain a Due Diligence Process**

Business Relationships shall conduct regular assessments of risks of adverse impacts on the Scope (see above) to identify whether they cause or contribute to adverse impacts through their own operations or services.

They shall then act to prevent or mitigate both actual or potential adverse impacts identified, and actions shall be tracked to ensure effectiveness. Business Relationships are expected to communicate their results (identifications, actions taken and measurements) to relevant stakeholders, including ProData Consult.

They shall require that their own Business Relationships meet the global minimum standard as well.

iii. **Provide for Access to Remedy**

In the event that a Business Relationship determines that they cause or contribute to actual adverse impacts in relation to the Scope, the Business Relationship must provide for access to remedy through legitimate processes (grievance mechanisms) for those affected. Notification of relevant authorities may be necessary in relation to significant impacts in the areas of environment and anti-corruption.

If a Business Relationship becomes aware of an actual severe adverse impact with which it is merely associated, the Business Relationship must either use or build leverage to get the causing or contributing entity to stop the impact and prevent or mitigate re-occurrences, or end the relationship.

IV.

IMPLEMENTATION


ProData
consult

1. **ProData Consult** has also implemented the requirements outlined in this CoC and is prepared to share information or documentation with our Business Relationships.
2. **This CoC applies to** ProData Consult's first-tier Business Relationships. ProData Consult's first-tier Business Relationships shall expect their first-tier Business Relationships to have similar and adequate processes in place to manage adverse impacts on the Scope. This includes making such Business Relationships aware of the minimum standard for responsible business conduct as outlined by UNGPs/ OECD and requiring that such Business Relationships meet the standard.
3. **Small and medium-sized** Business Relationships need not submit documentation of implementation to ProData Consult, unless warranted by specific circumstances.
4. **If ProData Consult's** Business Relationships cause, contribute to or are linked to severe impacts on the Scope, Business Relationships shall notify ProData Consult immediately. The notification shall include an account of the Business Relationship's actions to end the severe impacts and to prevent or mitigate re-occurrence. If a Business Relationship neglects to notify ProData Consult of and address severe impacts, or demonstrates lack of willingness to meet the international minimum standard, ProData Consult reserves the right to end the business relationship immediately.
5. **Business Relationships** must maintain appropriate records to demonstrate compliance with the requirements of this CoC. Appropriate records include: policy statement(s), Code of Conduct for Business Relationships, documentation of due diligence processes (including operational-level impact assessments with transparent records on tracking effectiveness of specific actions), and documented grievance mechanisms.
6. **This CoC** should form the foundation for collaboration between ProData Consult and our Business Relationships in order to pursue continuous improvements in managing adverse impacts on the Scope. Should a Business Relationship not have implemented a management system in alignment with this CoC at receipt, an implementation plan shall be developed and, if required, presented to ProData Consult. In this case the Business Relationship shall forward a policy commitment (confer III.i.) within one year, and the first operational level impact assessment(s) for the part of the business in regard to which ProData Consult is directly linked to the Business Relationship shall be performed after two years, if so required.
7. **ProData Consult** expects Business Relationships to be able to account for their progress in implementation in relation to the requirements contained in this CoC at any time.

