

CODE OF CONDUCT FOR SUPPLIERS

Policy name	Code of Conduct
Responsibility	CEO

1. Policy Statement

- 1.1. Eulogy is committed to maintaining high ethical standards in our business, whether conducted internally by our employees or externally by the third parties with whom we engage.

2. Policy Objective

- 2.1. This Code of Conduct for Employees, Suppliers and Service Providers is intended to ensure that subcontractors, freelancers, suppliers, and other third parties (“Our Suppliers”) understand and agree to meet these same standards.
- 2.2. In agreeing to provide goods or services for Eulogy or Eulogy clients, our Suppliers hereby consent to compliance with the following standards in all business dealings related to Eulogy.
- 2.3. Our Employees and Suppliers are expected to communicate these standards to all applicable individuals performing services for Eulogy or our clients.
- 2.4. Questions, concerns, or potential violations of these standards must be communicated to the Eulogy account team for raising with our management team.

3. Honesty

- 3.1. Eulogy is committed to honesty; it is a measure by which we hold ourselves highly.
- 3.2. We build trust with our clients and their audiences by providing all information necessary for informed and responsible decision making.

4. Communications

- 4.1. We must adhere to the highest standards of accuracy and truth in advancing the interests of our clients and in communicating with their audiences.
- 4.2. We do not intentionally disseminate false or misleading information or omit critical information that is essential to avoid misinformation.

5. Documentation

- 5.1. We take reasonable steps to evaluate the reliability and basis for claims, or other information, before releasing it on behalf of our clients.
- 5.2. We act promptly to coordinate with our client to appropriately respond to any erroneous communications for which we are responsible.

6. Transparency

- 6.1. Eulogy is committed to transparency.
- 6.2. Lack of transparency can call into question the integrity of communications and create an unacceptable level of risk for our reputation and that of our clients.
- 6.3. Our Suppliers must not act in any way that may appear to be an attempt to deceive us, our clients or their audiences. The following are just a few examples of how our Suppliers should display transparency:

6.3.1. By proactively disclosing their identity and affiliation with Eulogy and the client they may be serving when communicating through blogs or other online media.

6.3.2. By refusing to pay or provide any other hidden reward in exchange for an expectation of an agreed outcome or action.

7. Fair Dealing

7.1. Eulogy is committed to fair dealing.

7.2. We deal fairly with clients, competitors, peers, suppliers, public officials, the media, and the general public.

7.3. Promoting healthy and fair competition among professionals preserves an ethical climate while fostering a robust business environment.

7.4. Our Suppliers must not directly or indirectly offer bribes, kickbacks, or anything else of value that could be interpreted as an attempt to fraudulently or unethically obtain or retain business on behalf of Eulogy. Business gifts and entertainment must meet applicable legal, ethical, and cultural norms to preserve the free flow of unprejudiced information.

8. Intellectual Property

8.1. Our Suppliers must respect and preserve intellectual rights in the marketplace.

9. Confidential Information

9.1. The nature of our work often gives us access to confidential information that is not available to the public, which, if disclosed, could be useful to competitors or harmful to us or our clients.

9.2. Our Suppliers must protect confidential, "insider," or other sensitive information related to Eulogy and current, former, and prospective clients. They may not use such information to further their own interests or in violation of applicable insider trading regulations.

10. Rules of Engagement

10.1. Our Suppliers must respect the customs, rules, practices, and codes of conduct that apply to our industry and practice areas in all countries where we operate, including those related to our clients, colleagues, and fellow professionals.

10.2. Our Suppliers must act in a manner that preserves the integrity of the channels of public communications that are used, and respect the independence, rights, rules, and guidelines established by the information media.

11. Human Rights

11.1. Our Suppliers must support and respect the free exercise of human rights, not only those in the workplace but also those relating to the freedom of speech and of association, which affect the right of the individual to give and receive information.

11.2. Compensation, working hours, and minimum wage requirements all meet applicable regulatory standards.

11.3. Forced or involuntary labour may never be used and we expect every supplier to have and adhere to a Modern Slavery Statement.

11.4. Employees must be treated with dignity and respect and provided with a work environment that is free from discriminatory practices, harassment and abuse based on age, gender identity or expression, ethnicity, religion, gender, nationality, ancestry, citizenship, political affiliation, sexual orientation, disability, genetic information, pregnancy, personal appearance or family responsibilities.

12. Conflicts of Interest

- 12.1. Our Suppliers must avoid actions and circumstances that appear to compromise good business judgment or that create real, potential, or perceived conflicts between personal and professional interests when performing services for Eulogy or our clients.
- 12.2. Our Suppliers are required to notify Eulogy of any relationships they have with any Eulogy employee or any other potential conflicts that may be identified.

13. Health and Safety

- 13.1. Our Suppliers must provide a safe and healthy work environment for their employees.

14. Environment

- 14.1. Eulogy works hard to meet a high level of environmental, sustainability and governance (ESG) standards across its business. We expect our suppliers regardless of size, to have an actionable policy and framework to help it achieve similar considerations.
- 14.2. All our suppliers must consider the environmental impact of goods and services provided in business dealings with Eulogy.
- 14.3. This includes, but is not limited to, minimising carbon footprint through effective travel, use of recycled materials and recycling of waste products, responsible wastewater and solid waste disposal, resource utilization reduction, and so on.

15. Sustainable Development

- 15.1. Eulogy expects our Suppliers to conduct business ethically, be committed to supplier diversity, and be aligned with U.N. Sustainable Development Goal #8, which focuses on promoting inclusive and sustainable economic growth, full and productive employment, and decent work for all.

16. Best Practice

- 16.1. Eulogy strives to model best practice in all areas of our business
- 16.2. We acquire and responsibly use specialized knowledge and experience, and in doing so build mutual understanding, credibility, and relationships among an array of institutions and audiences.

17. Qualifications and Expertise

- 17.1. Our Suppliers should only accept work for which they are suitably skilled and experienced.
- 17.2. Where additional expertise is required, they should collaborate with the Eulogy account team to determine the best means of obtaining the necessary skill base or resources to serve our clients' needs.
- 17.3. Our Suppliers should stay informed and educated about practices in the profession to ensure ethical conduct and delivery of quality products and services for Eulogy and its clients.

18. Obeying the law

- 18.1. Obeying the law, in letter and spirit, is the foundation on which Eulogy's ethical standards are built.
- 18.2. In providing goods and services to Eulogy or our clients, our Suppliers must respect and obey the laws of the nations, regions, and cities in which they operate.
- 18.3. Our Suppliers acknowledge that Eulogy is a Limited Company registered in England and Wales and are therefore aware that services provided to Eulogy or its clients are subject to all applicable local and regional laws and regulations as well as those of England & Wales.

19. Anti-Corruption

- 19.1. In conducting business for Eulogy and its clients, our Suppliers are expected to comply with applicable anti-corruption and anti-money laundering statutes.
- 19.2. As such, our Suppliers must ensure that no payment, gift, contribution, bribe, rebate, payoff, kickback, or anything else of value is offered, authorized, promised or paid, directly or indirectly, in order to
 - 19.2.1. obtain or retain business for or with, or direct any business to, any entity or individual;
 - 19.2.2. obtain favourable treatment, special concessions or other improper business advantage;
 - 19.2.3. influence that person to act, make a decision, exercise discretion, pass judgment, fail to act, or make an omission in breach of a duty of good faith, impartiality or trust ("Acting Improperly"); or
 - 19.2.4. otherwise reward that person for Acting Improperly.

20. Privacy and Data Protection

- 20.1. Our Suppliers are expected to comply with all applicable data protection and privacy laws and regulations, including the E.U. General Data Protection Regulation (GDPR) and other such laws related to the collection, storage, transfer and processing of personal data.

21. Failure to Comply

- 21.1. Failure to comply with this code of conduct may result in Eulogy ceasing all commercial and non-commercial arrangements with the relevant supplier, and reporting the relevant supplier to the appropriate authorities.

ENDS