



# Supplier Code of Conduct

Global IoT Connectivity  
**Made Effortless**

# Introduction

In pursuit of our mission to provide the world's best connectivity we hold ourselves to the highest standards of integrity and ethics, ensuring that every decision and action reflects our deep commitment to honesty, fairness, and respect. Pelion is dedicated to leading the way in sustainable practices enabling our teams, partners and the wider technology industry ecosystem. We strive to be a catalyst for positive change by integrating environmental responsibility and societal well-being into the very heart of our operations. We expect our suppliers to uphold the same values and adhere to the highest standards of integrity, fairness, and compliance.

This Supplier Code of Conduct outlines the principles and expectations that all suppliers must follow when conducting business with Pelion to ensure;

## 1 Compliance with Laws, Rules and Legal Regulations

Suppliers will comply with all applicable laws, rules and regulations in the countries in which they operate and will maintain suitable measures to ensure compliance laws, rules and regulations.



## 2 Promoting Labour and Human Rights

We expect our suppliers to share our commitment to human rights and equal opportunity in the workplace.

### ◆ No Child Labour

Pelion has zero tolerance to child labour and expects that suppliers will not employ underage workers ensuring compliance with the minimum age requirements set by local laws and international standards.

## ● No Forced Labour

Suppliers must not participate in human trafficking; use forced, involuntary, or slave labour; or purchase materials or services from companies using forced, involuntary, or slave labour. They must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.

## ● Fair Wages and Working Hours

Suppliers shall provide fair compensation and comply with legal requirements for wages, benefits, and working hours. Pelion encourages suppliers to pay their employees a Living Wage as a minimum in line with the International Labour Organisation definition of a living wage (Real Living Wage within the UK).

Suppliers should conduct operations in ways that limit overtime to a level that ensures a humane and productive work environment. However, if overtime is required it should be paid at an amount that is the same as or greater than the Living Wage in accordance with the requirements of the International Labour Organisation.

Pelion discourages the use of contracts with no guarantee of work (zero hours contracts in the UK) within our supply chain.

## ● Safe Working Conditions

Suppliers are expected to have appropriate management systems, controls, policies and training in place to ensure their operations run in a safe manner, protecting their employees, visitors, customers or the local communities in which they operate from harm. This includes compliance with all applicable law and regulation in relation to health and safety.

## ● Non-Discrimination and Equal Opportunity

Pelion is committed to conducting business in a manner that respects the rights and dignity of all people. We adhere to the principles set forth in the Universal Declaration of Human Rights and other international human rights standards. To maintain this standard, we have implemented a zero-tolerance policy for any behaviour that undermines our commitment to these values. Suppliers shall treat all individuals with respect and fairness and will observe basic human rights set forth, including, but not limited to, the prohibition of forced or child labour, and the provision of reasonable wages, social benefits, working hours, freedom of association and other fair working conditions in compliance with applicable laws.

Suppliers will maintain an environment free of discrimination and harassment based on gender, age, race, skin colour, ethnicity, culture or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation or any other characteristics protected by applicable laws.

## 3 Ensuring Ethical Business Practices

### ◆ Anti-Corruption

Pelion does not tolerate any form of corruption. Thus, Suppliers shall comply with applicable laws and regulations concerning anti-bribery and anti-corruption. Suppliers will neither engage in nor tolerate any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments for the purpose of influencing the decision-making process in violation of applicable laws.

Records should always accurately reflect business activities and include accurate accounting, financial controls, internal reporting, and taxation records.

### ◆ Fair Competition

Suppliers shall compete fairly and strictly comply with all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing for example with monopolies, unfair competition and restraints of trade, and relationships with competitors and customers. Suppliers will not enter into agreements with competitors or engage in other acts that may unfairly impact competition, including, but not limited to, price fixing or market allocations.

### ◆ Security, Data Protection & Confidentiality

Suppliers will comply with all applicable laws, regulations, and compliance requirements concerning security and data protection.

Suppliers must respect and protect the confidentiality of any sensitive business information shared by Pelion. Appropriate non-disclosure or confidentiality agreements will be used to formally protect proprietary information.

Supplier shall ensure that its business practices are consistent with industry standard security practices.

## Encouraging Environmental Responsibility

### ◆ Sustainable Practices

Pelion is committed to the Paris Agreement, aiming for a 2°C limit and a 30% emissions reduction by 2030. We seek to engage with suppliers who share this commitment. Suppliers shall take measures to minimize environmental impact and adopt sustainable business practices considering biodiversity and sustainable land management.

### ◆ Waste and Pollution Management

Suppliers must comply with environmental laws and regulations regarding waste disposal, emissions, and pollution control.

### ◆ Resource Efficiency

Suppliers are encouraged to use energy, water, and raw materials efficiently and responsibly.

# Monitoring and Compliance

Suppliers shall conduct themselves in line with the Code and have a program to ensure that their own suppliers who directly or indirectly provide products or services (or components thereof) to Pelion meet expectations consistent with those set out in this document.

Pelion reserves the right to conduct audits and assessments to ensure compliance with this Supplier Code of Conduct and maybe required to confirm their compliance with this Supplier Code of Conduct. Any failure to respond to such requests will be deemed as a non-compliance and may result in the termination of the business relationship.



## Reporting Violations

Suppliers must report any known or suspected violations of this Code of Conduct to Pelion through designated communication channels. Retaliation against individuals who report violations in good faith is strictly prohibited.

Report any suspected violations to **[pelion-procurement@pelion.com](mailto:pelion-procurement@pelion.com)**

By adhering to this Supplier Code of Conduct, suppliers contribute to a responsible, ethical, and sustainable business environment. We appreciate your commitment to these principles and look forward to a collaborative partnership built on integrity and shared values.



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