



Global Supplier Policy

Procurement, Third Party Risk Management and Ethics Policy



WHY

UBS is committed to operating to the highest ethical and professional standards as required by our regulators. In support of that commitment, we mandate that suppliers with which we collaborate will comply with our "UBS Procurement, Third Party Risk Management and Ethics Policy".



WHEN

At all times when you work with us.



WHAT to know about **HOW** to comply

1. Risk Assessments

- You shall respond accurately and promptly to UBS's requests for information relating to risk assessments. Risk assessments are conducted in parallel to the RFx / onboarding processes and are to be completed before entering into an Agreement. Additional risk assessments may be conducted on a cyclical basis.

2. Pre-Contracting Engagement with UBS

- You shall not participate in or conduct direct negotiations with UBS stakeholders and shall not submit Commercial Proposals to UBS unless requested to do so by UBS Group Corporate Services – Supply Chain or our outsourced procurement services provider, ChainIQ.
- You shall allow ChainIQ to access Commercial Proposals and other Confidential Information as part of the sourcing process with UBS.
- You shall not provide to UBS any Product or Service in advance of a fully executed Agreement. UBS shall not be liable for Products or Services delivered in advance of a fully executed Agreement.

3. Conflicts of Interest and Ethics

- You shall notify UBS promptly, via the whistleblowing hotline detailed below, of any potential or actual conflicts of interest. There are a number of ways a conflict can arise. Examples of a conflict of interest include:
 - When UBS is providing (or is in discussions to provide) banking or financial services to you or one of your Affiliates
 - When a personal relationship exists between your employees and UBS or ChainIQ staff involved in the decision-making process of sourcing and or contracting.

- You shall have formal policies and processes in place to protect your Staff who report conduct which they reasonably believe amounts to a violation of Applicable Laws, from being terminated, demoted, suspended, threatened, harassed or in any other manner discriminated against or subject to detriment.
- You and your Staff may report any conflict of interest, breach of Applicable Laws or ethics violation via our whistleblowing hotline (available at <https://www.ubs.com/global/en/contact/ubs-staff-misconduct.html>). You will make your Staff aware of this hotline.

4. Business Travel and Expenses

- In the event UBS agrees to reimburse you for travel and other business-related Expenses, you shall procure economical business-travel, accommodation and other relevant arrangements.
- Any approved travel must be booked by UBS authorized employees and through UBS's designated travel agencies.

5. Publicity, Inquiries, Use of UBS Brand

- Neither you nor your Staff shall make any public comments or statements which are disparaging to UBS, our employees, our peers and competitors, or to any person or firm with whom or which UBS has a business relationship, or which could adversely affect the conduct of UBS's business or reputation.
- Should you receive any communication or inquiry from any legal or regulatory authority with respect to your business dealings and transactions with UBS, you shall, to the extent permitted under Applicable Laws, immediately direct such communication or inquiry to UBS.
- To the extent you are required to use any UBS brand elements in the course of your business dealings with UBS, you shall use such UBS brand elements in compliance with UBS's brand design guidelines and other requirements provided by UBS. You shall not use the UBS brand elements without UBS's prior written approval.

6. Third Party Risk Management

- You shall have a documented third-party management framework governing the identification, management, and risk assessment of Supplier Third Parties. This third-party management framework shall:
 - assign roles and responsibilities regarding the management of Supplier Third Parties.
 - contain a requirement to verify the existence of appropriate contracts between the Supplier and Supplier Third Parties; and

- set out how you identify requirements for and manage business continuity, information security (including cyber security), financial risks, environmental and social risks and other risks related to Supplier Third Parties.
- Upon request of UBS, you shall disclose your third party management framework to UBS and to supply a list of critical Supplier Third Parties, including providers of utility services.