

Supplier Code of Conduct

1. Purpose and Scope

Fuse Universal (“Fuse”) operates as a global digital learning platform provider, working with a network of suppliers including technology providers, professional services firms, contractors, and other third-party partners.

Fuse recognises that modern slavery risks may arise within complex global supply chains. Suppliers are therefore expected to ensure that their own supply chains operate ethically and in compliance with applicable labour and human rights laws.

Compliance with this Code is a condition of doing business with Fuse. Suppliers are expected to ensure that their employees, agents, and subcontractors comply with the principles set out below.

2. Legal Compliance

Suppliers must comply with all applicable laws, regulations, and industry standards in the countries in which they operate, including (but not limited to) laws relating to employment, health and safety, human rights, anti-bribery and corruption, and environmental protection.

Where local laws and this Code address the same topic, the higher standard shall apply.

3. Human Rights and Modern Slavery

Suppliers must respect and uphold internationally recognised human rights standards, including those set out in the United Nations Universal Declaration of Human Rights.

Suppliers must:

- Prohibit all forms of modern slavery, forced labour, bonded labour, and human trafficking
- Ensure employment is freely chosen and that workers are not required to lodge deposits or identity documents
- Prohibit child labour and comply with minimum age laws
- Pay at least the applicable minimum wage and comply with working time regulations
- Respect the right of workers to freedom of association and collective bargaining

Fuse expects its Suppliers to align with the principles outlined in Fuse's *Modern Day Slavery & Human Rights Statement* .

4. Equality, Diversity and Fair Treatment

Suppliers must provide a working environment that is inclusive, respectful, and free from unlawful discrimination, harassment, bullying, or victimisation.

Suppliers must not discriminate on the basis of protected characteristics, including age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

Suppliers are expected to uphold standards consistent with Fuse's *Equal Opportunities Policy* and *Equality, Diversity & Inclusion Policy* .

5. Health and Safety

Suppliers must provide a safe and healthy working environment and take all reasonable steps to prevent accidents, injuries, and work-related illness.

This includes:

- Identifying and managing health and safety risks
- Providing appropriate training and supervision
- Maintaining safe systems of work and welfare facilities
- Complying with applicable health and safety laws and regulations

Suppliers working on Fuse premises or interacting with Fuse personnel must comply with Fuse's health and safety requirements, aligned to Fuse's *Health & Safety Policy*.

6. Anti-Bribery, Anti-Corruption and Ethical Conduct

Fuse operates a zero-tolerance approach to bribery and corruption.

Suppliers must:

- Not offer, give, solicit, or accept bribes, facilitation payments, or kickbacks
- Conduct business honestly, transparently, and with integrity
- Avoid conflicts of interest and disclose any potential conflicts to Fuse
- Maintain accurate books and records

Suppliers are expected to comply with standards consistent with Fuse's *Anti-Bribery & Anti-Corruption Policy* .

7. Environmental Responsibility and Sustainability

Suppliers are encouraged to minimise their environmental impact and operate responsibly.

At a minimum, Suppliers must:

- Comply with applicable environmental laws and regulations
- Manage waste, emissions, and resource use responsibly
- Take reasonable steps to reduce environmental harm

Fuse encourages Suppliers to align with the principles set out in Fuse's *Corporate Social Responsibility Policy* .

8. Confidentiality and Data Protection

Suppliers must protect confidential information and personal data obtained through their relationship with Fuse and comply with applicable data protection and privacy laws.

Confidential information must only be used for legitimate business purposes and must not be disclosed without authorisation.

9. Reporting Concerns and Non-Compliance

Suppliers are expected to promptly report any actual or suspected breaches of this Code, or any unlawful or unethical behaviour connected with Fuse.

10. Monitoring, Audit and Compliance

Fuse reserves the right to:

- Request information or evidence of compliance with this Code
- Conduct audits or assessments (directly or via a third party)
- Require corrective actions where issues are identified

Failure to comply with this Code may result in corrective action, suspension, or termination of the supplier relationship.

11. Acknowledgement

By doing business with Fuse Universal, suppliers confirm that they have read, understood, and agree to comply with this Supplier Code of Conduct and the principles referenced herein.

Modern Slavery Governance and Supply Chain Responsibility

1. Policies on Modern Slavery and Human Trafficking

Fuse maintains a zero-tolerance approach to modern slavery, forced labour, bonded labour, and human trafficking.

This commitment is supported through relevant internal policies including:

- Modern Slavery and Human Rights Statement
- Supplier Code of Conduct
- Whistleblowing and Speak-Up Policy
- Anti-Bribery and Anti-Corruption Policy

Suppliers are expected to maintain equivalent policies and controls to prevent modern slavery within their operations and supply chains.

2. Due Diligence Processes

Fuse applies proportionate due diligence processes when engaging and managing suppliers to identify and mitigate risks of modern slavery.

These may include:

- Supplier onboarding checks and ethical standards assessments
- Contractual obligations requiring compliance with this Code
- Supplier declarations or certifications relating to labour practices
- Periodic reviews or assessments of supplier compliance

Suppliers must cooperate with reasonable information requests and demonstrate compliance where required.

3. Risk Assessment and Management

Fuse takes a risk-based approach to managing modern slavery risks within its operations and supply chain. Risk assessments may consider factors including:

- Geographic location of suppliers
- Industry sector risks
- Nature of services provided
- Use of subcontractors or temporary labour

Where higher risks are identified, Fuse may implement additional controls including enhanced due diligence, monitoring, or corrective action plans.

4. Monitoring and Key Performance Indicators

Fuse monitors the effectiveness of its approach to preventing modern slavery through a range of measures, which may include:

- Percentage of suppliers that acknowledge and comply with this Code
- Completion of supplier due diligence assessments
- Number of modern slavery concerns reported or investigated
- Supplier audit outcomes and corrective actions implemented

These measures support continuous improvement in ethical supply chain management.

5. Training and Awareness

Fuse provides appropriate training and awareness to relevant employees on modern slavery risks and responsible supply chain management.

Training may include:

- Identifying indicators of forced labour or trafficking
- Reporting concerns or suspected violations
- Understanding supplier compliance expectations

Suppliers are encouraged to provide similar training within their organisations.
