

## **Worldcoin Supplier Code of Conduct**

This Code of Conduct defines the basic requirements placed on the suppliers and third-party intermediaries of Tools for Humanity Corporation and its wholly owned subsidiary, Tools for Humanity GmbH (collectively “Worldcoin”) concerning their responsibilities towards their stakeholders and the environment. You hereby agree to comply with the following requirements when providing goods and services to Worldcoin:

### **Legal Compliance**

- Comply with applicable law of the applicable legal systems.
- Comply with Worldcoin’s requirements.

### **Fair Operating Practices**

- Anti-Corruption and Bribery
  - Tolerate no form of and do not engage directly or indirectly in any form of corruption or bribery.
  - Do not grant, offer, or promise anything of value to a government official or to a third to influence official action or obtain an improper advantage.
  - Renounce from giving or accepting improper facilitation payments.
  - Make payments only with proper documentation.
- Fair Competition, Antitrust Laws and Intellectual Property Rights
  - Act in accordance with national and international competition laws
  - Do not participate in price-fixing, market or customer allocation, market sharing or bid rigging with competitors.
  - Respect the intellectual property rights of others.
  - Make sure you have obtained the proper software licenses (e.g. on Open Source Software) when incorporating the software into your deliverables or when using the software to provide the services to us.
- Conflicts of Interest
  - Avoid and disclose internally and to Worldcoin all conflicts of interest that may influence business relationships.
  - Avoid the appearance of impropriety mentioned above.
- Anti-Money Laundering, Counter Terrorism Financing
  - Do not directly or indirectly facilitate money laundering or terrorism financing.
  - Perform and document appropriate Know-Your-Counterparty checks before engaging with any supplier or third party.
  - You take appropriate, risk-based measures to verify the identity and economic background of your customers, business partners, and other third parties, and the origin of payments to ensure they come from legitimate sources.
  - You follow-up on suspicious business relationships, activities, and transactions immediately and report those to law enforcement authorities, when necessary.
- Export Control and Customs
  - Comply with the applicable export control and customs regulations, and inform Worldcoin of respective upcoming changes in your jurisdiction.
  - Cooperate with Worldcoin on Worldcoin’s efforts to comply with the same.

### **Data Protection and Privacy**

- Comply with the European Union’s GDPR principles on the protection of personal data

whenever you process personal data of people residing in the European Union. You must also comply with applicable data protection laws in the jurisdictions where you are operating.

- Process personal data confidentiality and responsibility.
- Respect everyone's privacy and ensure that personal data
  - is effectively protected by protected by appropriate technical and organizational measures,
  - and is used only for legitimate purposes.
- Immediately inform Worldcoin's Data Protection Officer of possible data protection violations.

## **Human Rights and Labor Practices**

To ensure respect of all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations, heightened attention shall be paid to ensuring respect of human rights of specifically vulnerable rights holders or groups of rights holders such as women, children or migrant workers, or of (indigenous) communities.

- Prohibition of Forced Labor
  - Neither use nor contribute to slavery, servitude, forced or compulsory labor and human trafficking.
- Prohibition of Child Labor
  - Employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, employ no workers under the age of 14.
  - Employ no workers under the age of 18 for hazardous work according to ILO Convention 182.
  - When appointing new employees, you verify their dates of birth and document them in the personnel files. Taking account of stricter country-specific legislation, you do not employ any workers under the age of 15 or – for hazardous work – the age of 18.
- Non-Discrimination and Respect for Employees
  - Promote equal opportunities and treatment of employees, irrespective of skin color, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, or age.
  - Do not tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.
- Working Hours, Wages & Benefits for Employees
  - Recognize the legal rights of workers to form or join existing trade unions and to engage in collective bargaining
  - Neither disadvantage nor prefer members of employee organizations or trade unions.
  - Adhere to all applicable working-hours regulations globally.
  - Pay fair wages for labor and adhere to all applicable wage and compensation laws globally.
  - In the event of cross-border personnel deployment adhere to all applicable legal requirements, especially with regard to minimum wages.
- Health & Safety of Employees
  - Act in accordance with the applicable statutory and international standards regarding occupational health and safety and provide safe working conditions.
  - Provide training to ensure employees are educated in health & safety issues.
  - Establish a reasonable occupational health & safety management system.
- Grievance Mechanism

- Provide access to a protected mechanism for their employees to report possible violations of the principles of this Code of Conduct.

### **Environmental Protection**

- Act in accordance with the applicable statutory and international standards regarding the environment. Minimize environmental pollution and make continuous improvements in environmental protection.
- Establish a reasonable environmental management system.

### **Responsible Minerals Sourcing**

- Make reasonable efforts to avoid in your products the use of raw materials (in particular tantalum, tin, tungsten or gold) which originate from Conflict-Affected and High-Risk Areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

### **Supply Chain**

- Use reasonable efforts to make its suppliers comply with the principles of this Code of Conduct.
- Comply with the principles of non-discrimination with regard to supplier selection and treatment.
- Implement respective control mechanisms in your own supply chain.
- Have an appropriate complaint process in place.

\*\*\*