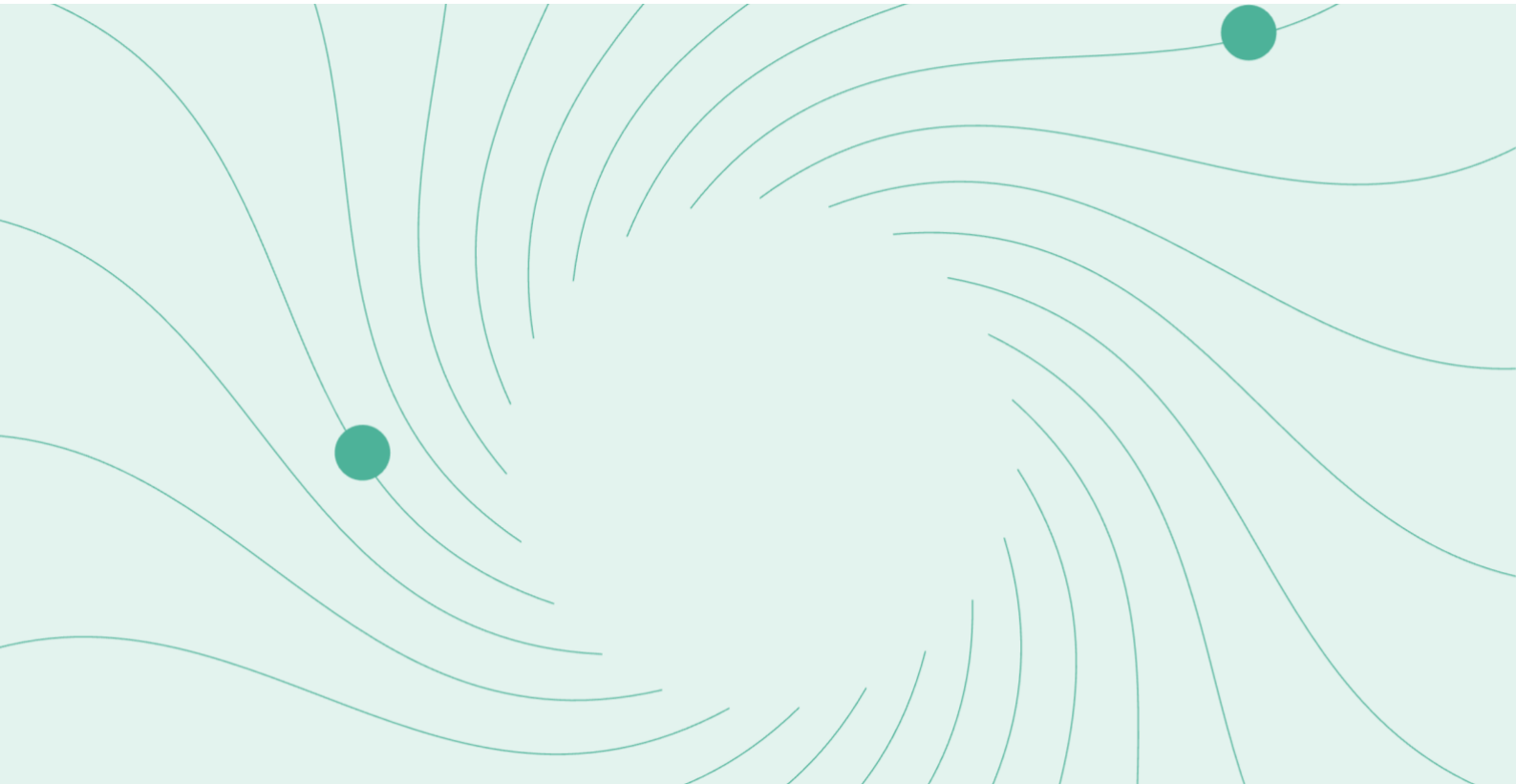




Supply Chain Ethical Code



Policy Owner:	Spencer Caldwell, Head of Services	Date Issued:	April 21, 2025
Approved by:	Spencer Caldwell, Head of Services	Last Updated:	April 21, 2025
Policy Contact:	Mike Muilenburg, VP, Supplier & Contract Management	Classification:	Public

A. BACKGROUND

At every turn, Thomson Reuters (TR) endeavours to do the right thing, conducting our business honestly and with good judgment while complying with the many different laws, rules and standards of conduct that apply to us wherever we do business. We are also committed to developing strong business relationships with high quality Suppliers that have committed to operate under ethical standards equivalent to our own, such that their business practices are consistent with the needs and expectations of Thomson Reuters' customers, investors, and the global community we serve.

At Thomson Reuters, we believe that by engaging in sustainability discussions and implementing environmental checks in our supply chain, we will inspire our customers, investors and the community to promote efficient, sustainable practices, and set targets in line with climate science.

Thomson Reuters' ethical values and the way we do business are reflected in the Thomson Reuters Code of Business Conduct and Ethics, which applies to all officers, directors, employees, and contingent workers of Thomson Reuters.

The Thomson Reuters Supply Chain Ethical Code applies specifically to our Suppliers (or "Business Partners") worldwide and seeks to encourage comparable standards of behaviour, thereby driving commitment to ethical improvements through our supply chain.

B. SUPPLIER REQUIREMENTS

As a Thomson Reuters Supplier, you are required to comply with the provisions of this Code.

C. DEFINITIONS

In this Code:

- "Supplier" or "Business Partner" mean any company, partnership or individual that is supplying goods and/or services to one or more members of the Thomson Reuters group of companies.
- "Worker" means any individual whom Supplier employs, hires, engages or otherwise uses to conduct its business.

D. SCOPE

The terms of this Code apply equally (i) to any affiliated company of Supplier and (ii) to any agent or sub-contractor of Supplier to the extent that such agent or sub-contractor is performing services for Supplier or its affiliated company.

Accordingly, the term "Worker" may also include any individual employed, hired or otherwise engaged by Supplier's affiliated companies or by Supplier's or its affiliated companies' sub-contractors or agents.

E. OBLIGATIONS

1. No Forced Employment

- Work must be voluntary and Workers are neither forced nor bonded to work, nor work in an involuntary capacity in prison labor. Supplier must not use, participate in, or benefit from, any form of human trafficking.
- Workers must not be required or asked to pay Supplier or its agents recruitment fees or other fees. Workers must not be asked to lodge "deposits" or their identity papers (such as passports or driver's licenses) with Supplier and Supplier must not deny access to such identity papers. Workers must have the explicit freedom to terminate their employment or any other working relationship with Supplier at any time, without fear of reprisals or adverse consequences, upon providing reasonable notice.
- All work must be conducted within the framework of a legally recognized employment or independent contractor relationship, adhering to all applicable laws and regulations.
- Supplier must prohibit the use of misleading or fraudulent practices during the recruitment or employment process.
- Workers must have the right to receive essential employment information in a format and language that is easily understandable and accessible. This information includes fundamental details about their employment, such as wages, benefits, work location, living conditions, housing arrangements, associated costs (if applicable), additional charges borne by the Workers, and any potential work hazards.
- Recruitment fees or other similar fees charged to workers and payable to the employer, recruiting agent, or sub-agent are strictly prohibited. If such fees are found to have been paid by Workers, Supplier will be required to repay such fees to the Workers.

2. No Child Labour

- Supplier must not use child labour. The term "child" means any person who is (a) under the age of 15 or (b) under the minimum age for employment in the country, state, or local jurisdiction, whichever is greater.
- Workers under the age of 18 must not perform work that is likely to jeopardize their health or safety, including shifts at night or working in hazardous conditions.

3. Freedom of Association and the Right to Collective Bargaining

- Workers must be allowed to freely associate with others, form and join (or refrain from joining) organisations of their choice, and bargain collectively without interference, discrimination, retaliation, or harassment.
- Supplier must provide a parallel means for independent and free association and bargaining when the right to freedom of association and collective bargaining is restricted under law.
- Supplier must not discriminate against Workers that participate in collective bargaining or parallel means and must ensure such Workers are not obstructed from performing their job duties or accessing the workplace.

4. Work Health and Safety

- Workers must be provided with a safe and healthy working environment.

- Regular and recorded health and safety training must be provided to all Workers, including new or reassigned Workers.
- Supplier must comply with all applicable laws and regulations regarding working conditions.
- Worker health and safety must be a priority throughout all significant aspects of business activities.
- Supplier must have appropriate policies, standards, procedures, contingency measures and management systems in place to prevent occupational illnesses and work-related accidents and to provide a safe and healthy workplace to its Workers.

5. Wages and Benefits

- Wages and benefits paid to Workers must comply with applicable laws and regulations, including those related to minimum wages, overtime hours and mandated benefits, in line with [standards](#) of the International Labor Organization (ILO). Workers must be paid in full and in a timely manner.
- Supplier must not compel Workers to engage in unpaid work.
- Work week must not be more than 60 hours per week, including overtime, except in emergency or unusual situations.
- All Workers must be provided with written and understandable information about their employment conditions with respect to wages and benefits before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Supplier shall only deduct wages as a disciplinary measure if allowed under applicable law and the Worker has provided express permission (e.g., through an employment contract or agreement to abide by Supplier's policies).
- Supplier must keep records regarding employee working hours and pay in accordance with applicable laws or regulations and provide such records to Thomson Reuters upon request.

6. No Discrimination

- Supplier must be committed to a workforce free of harassment and unlawful discrimination. Supplier must not engage in discrimination in hiring or other employment practices, such as compensation, access to training, promotion, termination, or retirement, based on race, color, religion, age, sex, gender, pregnancy, marital status, sexual orientation, gender identity and expression, national origin, citizenship status, disability, veteran status or any other classification protected by applicable laws or regulations.
- Workers must be assured free movement and must not be subject to monitoring by security guards.
- The grievance procedures provided must be accessible to all Workers, culturally appropriate, and include the option to report anonymously where appropriate. Workers and/or their representatives must be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. Supplier must periodically provide Workers with information and training on all grievance procedures.

7. No Harsh or Inhumane Treatment

- Supplier must strictly prohibit all forms of physical abuse or discipline, the use of threats related to physical harm, sexual or any other type of harassment, and verbal abuse or any other means of intimidation.

8. Anti-bribery and Anti-corruption

- Supplier must comply with all applicable anti-bribery and anti-corruption laws and regulations, including, but not limited to, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.
- Supplier must not accept, offer, promise, pay, permit or authorize:
 - bribes, facilitation payments, kickbacks, or illegal political contributions;
 - money, goods, services, entertainment, employment, contracts, or other things of value, to obtain or retain improper advantage; or
 - any other unlawful or improper payments or benefits.
- Supplier must ensure its business records, including all requests for payment, fully and accurately reflect transactions, expenditures and/or services performed. All payments or requests for reimbursement must be substantiated by authorized written receipts, invoices or other appropriate documentation detailing the expenses or costs incurred and/or work performed on behalf of Supplier or Thomson Reuters.
- Supplier must keep a written accounting of all payments (including, but not limited to, any gifts, meals, entertainment or anything else of value) made on behalf of Thomson Reuters or out of funds provided by Thomson Reuters. Supplier will furnish a copy of this accounting to Thomson Reuters upon request.
- Supplier must screen, engage, and monitor Workers to ensure they understand and adhere to these requirements.
- Supplier must provide appropriate and regular training and guidance to ensure adherence to all applicable anti-bribery and anti-corruption laws and regulatory guidance.

9. Environmental Sustainability

- Supplier must have implemented (or will implement by the end of 2025), an environmental sustainability program that sets targets in line with internationally recognized climate science, including those identified by the Science Based Targets Initiative.
- Supplier must operate in a manner that complies with applicable environmental laws and regulations including, but not limited to, those related to air, water, solid waste, hazardous waste, electronic waste and energy efficiency/carbon footprint. Supplier must mitigate adverse impacts to human health of local communities and the environment.

10. Data Privacy and Security

- Supplier must handle Thomson Reuters' data securely and in accordance with applicable contract terms and data protection laws and regulations.
- Supplier must implement all appropriate technical and organizational measures to safeguard data confidentiality, integrity, and availability.
- Supplier must establish procedures to respond to data breaches and other security incidents and promptly notify Thomson Reuters if any such data breaches or incidents occur or may have occurred affecting Thomson Reuters information.

11. Ensuring Compliance, Questions and Reporting Concerns

- On request, Supplier will furnish Thomson Reuters with relevant information and data to support compliance with this Code.

- Subject to local laws and any legal restrictions applicable to such reporting, Supplier is expected to promptly report to Thomson Reuters any violation of this Code of which it becomes aware.
- Supplier shall, or any of its Workers may, report violations or ask questions about this Code by contacting the Thomson Reuters Business Conduct and Ethics Hotline online at <https://secure.ethicspoint.com/domain/media/en/gui/42584/index.html> or by calling: +1.877.373.8837 in the U.S. or Canada (to call the Hotline outside the U.S. or Canada go to <https://secure.ethicspoint.com/domain/media/en/gui/42584/index.html> and select “File a Report by Phone”).
- Supplier may be subject to periodic assessments to evaluate their adherence to the Supply Chain Ethical Code.

Supplier must cooperate with Thomson Reuters' assessment process, provide necessary information, and take corrective actions to address identified non-compliance.

- Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.
- Supplier must not retaliate against any of its Workers who, acting in good faith, report what they reasonably believe is a violation of this Code.