

# MAGNIT SUPPLIER CODE OF CONDUCT

September 2024

Version 4.0

## MAGNIT SUPPLIER CODE OF CONDUCT

# Introduction

As the industry's most tenured, purely vendor-neutral Managed Services Provider (MSP) combined with the most innovative vendor Management System (VMS), we are committed to innovating the space today. We believe our tremendous success throughout the years has been due in no small part to this commitment to working with our customers and supplier partners to achieve innovation. Magnit's vendor neutral model creates a competitive environment where all qualified suppliers are given equal opportunity to compete; allowing suppliers to increase their visibility to additional users, Magnit clients, and in turn increase their volume.

Magnit's Supplier Code of Conduct outlines the behavioural and business standards that Magnit expects from its Supplier

Partners. In addition to implementing and maintaining their own internal procedures to ensure compliance with these standards, suppliers should have appropriate processes in place to allow its employees to gain an appropriate level of knowledge and understanding of the contents of this Code, the applicable laws and regulations, as well as any other generally recognized and applicable standards.

Suppliers who fail to comply with Magnit's Supplier Code of Conduct will result in action, up to and including termination of contracts.

Magnit reserves the right to require Suppliers to certify their compliance with this Code from time-to-time and to



disqualify, or decline to do business with, any Supplier that is not in compliance with, or fails to provide a certification with respect to, this Code.

To learn more about our Global Supplier Programs, please visit <https://magnitglobal.com/>. This Code of Conduct applies to all officers, directors, internal employees, consultants and contract employees of Magnit and all its operating companies and subsidiaries across the world. Additionally, we expect that our suppliers, vendors, sub-vendors and business partners follow

these principles and adhere to all of the principles outlined below:

- **Ethics**
- **Data Privacy**
- **Sanction Checks**
- **Diversity & Inclusion**
- **Employment & Working Conditions**
- **Health & Wellbeing**
- **Compliance with Code**
- **Contact**



## MAGNIT SUPPLIER CODE OF CONDUCT

# Ethics

Magnit looks to engage with Suppliers who treat others with respect, conduct their business in a fair and equitable manner, and act with integrity. Our suppliers must comply with all federal and local regulations, standards and laws that are in

place applying ethical principles across all levels of the company. This includes but is not limited to: opposing discrimination of employment, forced or compulsory labor or child labor, and modern slavery.

It is the responsibility of suppliers to avoid all conflicts of interest or situations that could appear to give rise to a conflict of interest. When a conflict of interest is identified, suppliers are expected to notify all affected parties.

### Anti-Bribery & Corruption

Suppliers must comply with all laws, rules, and regulations applicable to the country or countries in which they operate, and where they deliver products and services to Magnit and our clients. These include, but are not limited to, the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and with all applicable laws put in place to prevent bribery, corruption, fraud, tax evasion or related activities. Magnit will not tolerate the offering, promising, giving or facilitating any type of bribe. Nor do we tolerate requesting,

accepting, agreeing to accept, or receiving a bribe.

### Supplier Gift Acceptance Policy

Building business relationships and giving or receiving gifts can sometimes seem to go hand in hand. Magnit discourages gifts from current or potential suppliers. Under no circumstance may a Magnit employee accept cash or a cash equivalent as a business gift from a supplier. Our vendor neutrality is key to the success of our programs and the perception that Magnit is giving preferential treatment to any supplier is detrimental.



## MAGNIT SUPPLIER CODE OF CONDUCT

# Data Privacy / Cyber Security / Infosec

Magnit Suppliers must protect all information and data received from Magnit or any of our clients while doing business with Magnit and in accordance with industry recognised good security practises, legislation, regulation, and contractual obligations. Such information and data must be always kept confidential and not used for any purposes other than the business purpose for which it was provided or made available.

All such information and data must be kept confidential and protected from any unauthorised access, destruction, use, modification, and disclosure, through appropriate organisational and technical controls, in accordance with Magnit policies and procedures.

Magnit aims for the highest standards concerning the protection of any personal data that may be processed by suppliers on behalf of Magnit and our clients. Magnit always expects that its suppliers comply with applicable data protection legislation and implement industry accepted security standards (whether appointed as a sub-processor by Magnit or appointed as a processor by a Magnit client).

Wherever suppliers are aware of a security and/or data privacy incident that affects or has the potential to affect Magnit or its customers or their customers, they must inform Magnit immediately.



## MAGNIT SUPPLIER CODE OF CONDUCT

# Sanction Checks

### Sanctions

Suppliers have a responsibility to ensure that they, and those within their supply chain, fully comply with applicable sanctions regimes (for example, United Nations, EU, UK and OFAC sanctions) and that they do not transact with any sanctions targets whether they are countries, entities or individuals. We expect all our Suppliers to adopt and maintain appropriate processes to ensure compliance with applicable sanctions regimes.





## MAGNIT SUPPLIER CODE OF CONDUCT

# Diversity & Inclusion

### Supplier Diversity

Magnit is committed to supporting the of development and inclusion of small, minority-owned, women-owned, LGBT-owned, Veteran-owned, Disability-owner, and other diversity classified businesses. It is our policy to ensure that these businesses are given a fair chance to compete and support Magnit's global client base.

Magnit Unites is the only comprehensive Diversity, Equity & Inclusion (DE&I) solution for the contingent workforce. Magnit's best-in-class consulting capabilities and industry-leading technology help provide clients with actionable insights to further drive cultural inclusion and promote hiring and supplier diversity.

Magnit's vendor-neutral model allows us to coach and lead our diverse supplier businesses to maximize their market share, prioritizing suppliers that model D&I best practices.

### Worker Diversity

At Magnit, we believe that truly fundamental and measurable change in contingent workforce diversity can only be brought about by focusing on the representation of individuals from sourcing, candidacy, to hiring.

It takes diversity of all dimensions to create truly global, transformative business. The united strength of unique qualities and individual characteristics amongst our employees, partners, and clients drives our success. United we



achieve more – together, we are truly united.

### Magnit's Equal Opportunity Policy

Magnit does not engage in any discriminatory practice or preferential treatment for applicants, employees, vendors, workers, suppliers, or clients. We firmly believe that our focus should be on sound business decisions and individuals' merits and understand that our company will thrive only through an environment of inclusiveness.

Magnit expects our Suppliers also adopt appropriate practices and procedures

which support a zero-tolerance approach to discrimination and comply with local laws.

### Social Media Policy

Suppliers to Magnit are expected to have a Social Media policy in place and their employees must not participate in the inappropriate use of social media (whether or not such usage relates to Magnit, its business, clients, employees or business partners) such as posting content that is abusive, malicious, obscene, threatening or intimidating, or that contains ethnic, religious, gender or other derogatory statements in any message or post.

## MAGNIT SUPPLIER CODE OF CONDUCT

# Employment & Working Conditions

### Human Rights and Labor Standards

Our suppliers shall follow all applicable wage and hour laws, health and safety laws, family and medical leave laws, military leave laws, and employment discrimination laws. Suppliers must maintain a work environment free of harassment, hostility, and discrimination.

Suppliers should have in place a policy that they maintain / follow that recognises

and protects the human rights of their employees and any suppliers, partners or anyone connected to their business operations.

### Modern Slavery

Magnit respects and supports the protection of human rights in its operations and supply chain. Magnit is also committed to upholding the International Labor Organization's Core Conventions

on labor rights and support the United Nations' Guiding Principles on Business and Human Rights.

To view Magnit's full Modern Slavery Statement please visit: [Modern Slavery Statement 2024.pdf \(magnitglobal.com\)](https://magnitglobal.com/modern-slavery-statement-2024.pdf)

All suppliers must ensure that they have taken the appropriate steps to ensure that their business operations, internally and

through their supply chains, are free from slavery and human trafficking practices and that all applicable legislation is always adhered to.

Suppliers must ensure to produce, adhere to and maintain their own internal policies for compliance with Modern Slavery, Anti-Bribery and Whistleblowing, and make available such policies immediately upon request of Magnit.



## MAGNIT SUPPLIER CODE OF CONDUCT

# Employment & Working Conditions (cont.)

### Whistleblowing

Magnit is committed to always ensuring the morality of its operations through strict guidelines on ethical business practice and encourages its suppliers to report unethical misconduct (including fraud), and misconduct, a violation or noncompliance with local legislation or jurisdictionally applicable regulation; or with reference to an employee's safety or health or unsafe working conditions or work practices in the employee's employment or place of employment.

Anonymous claims may be reported through Magnit's third-party Whistleblower Hotline, WhistleB, appropriate contact details can be found on our webpage at: <https://report.whistleb.com/en/message/magnitglobal/phone> or a submission can be made online at platform <https://report.whistleb.com/en/magnitglobal>.



Potential violations of law or policy include the following;

- Any of the matters set forth in the Code of Ethics and Business Conduct
- Deficiencies in or noncompliance with Magnit's internal accounting controls
- A violation or noncompliance with local legislation or applicable regulations
- Reference to an employee's safety or health, unsafe working conditions or work practices in the employee's employment or place or employment
- Refusal to participate in an activity that would result in a violation or local legislation or regulation



## MAGNIT SUPPLIER CODE OF CONDUCT

# Health & Wellbeing

### Health & Safety

Our suppliers must comply with all applicable health and safety laws to create a safe working environment for their employees and anyone else affected by their businesses.

Magnit is committed to sustainable development through supporting economic prosperity, improving social well-being, and acknowledging our environmental responsibility. Our suppliers should possess the same commitment. Suppliers should strive to improve the communities within which they operate.

### Sustainability

Magnit has selected the United Nations Sustainable Development Goals of Climate action; decent work and economic growth; and reduced inequalities to focus on within our own organization. We will also be asking all our suppliers to work with us to focus on these goals within their own organizations. Finally, Magnit confirmed its adherence to the UN Global Compact Principles.

Magnit requires that our suppliers comply with all applicable environmental laws, regulations and standards. Magnit's Environmental, Social and Governance policy is available on request.



## MAGNIT SUPPLIER CODE OF CONDUCT

# Compliance with the Code

### Compliance with the Code

Our programs are focused on assuring that our suppliers are providing a quality service on a timely basis at competitive rates. Magnit's suppliers are measured and monitored through Magnit's proprietary Total Quality Management (TQM) program. Magnit's program manages, tracks, evaluates, communicates with and rewards suppliers based on robust and granular metrics that are presented to program stakeholders in rich reports. As part of this process, Magnit uses a multi-metric point scorecard to measure supplier performance on a quarterly basis. The metrics are weighted, ranked, and quantified according to level of importance to the client.

- **As the program matures, suppliers can receive communication about specific areas for improvement and are given the opportunity to make progress through collaboration with Magnit. Suppliers understand and respect that participation in Magnit's vendor-neutral programs is an accomplishment earned and that programs are continually optimized for promotion of the best suppliers.**
- **Magnit also has a dedicated Supplier Relations function that acts as an advocate for suppliers to ensure that our clients are positioned to receive top-quality talent at the best available prices throughout fluctuations and major events that impact the staffing industry.**

Suppliers are expected to implement methods to identify and manage risks in the areas addressed by this Code and applicable legal requirements. Suppliers should also have a business continuity plan in place to ensure that their business operations will continue with minimal disruption in the event of a disaster.

Magnit reserves the right to conduct periodic evaluations to verify the Supplier's compliance with applicable laws and regulations and the principles set forth in this Code. Suppliers shall have a process for timely correction of any deficiencies identified by internal or external audits, assessments or inspections.

### Use of Magnit Global Brand

Suppliers may use Magnit's logos only as specified in their agreement with Magnit Global or with written consent from Magnit's Global Supplier Relations team.







## Contact Information

### **Compliance with the Code**

Supplier business development inquiries about Magnit clients should be routed to the Global Supplier Relations team, unless an existing relationship has been established – in other words, no “cold calls/emails” to Magnit staff and clients. This will help centralize all efforts as well as reduce the burden on the account teams which are prioritizing the needs of the client throughout the day.

Supplier Relations can be reached via their shared mailbox  
[SupplierRelations@MagnitGlobal.com](mailto:SupplierRelations@MagnitGlobal.com)

## The Evolution of Work

Learn more at  
[magnitglobal.com](https://magnitglobal.com)