

1) Scope

This Supplier Code of Conduct (the "Code") applies to suppliers of goods and services, including their representatives and employees (together, "Suppliers"), to Groupa Ltd. and its subsidiaries and their operating divisions and joint ventures (Collectively "Groupa Ltd.")

2) Purpose

Groupa Ltd. is committed to conducting business in an ethical and legal manner. All Suppliers are a representation of Groupa Ltd. This Code reflects the core values of Groupa Ltd. along with its expectations of Suppliers when conducting work with Groupa Ltd.

Compliance with this Code is a requirement of any and all agreements set out between Groupa Ltd. and Suppliers. Failure to adhere to this Code may be grounds for termination of the supplier relationship and any related agreements.

Groupa Ltd's Core Values and Business Practices

1) Safety & Sustainability

Suppliers must have an established health and safety program that meets legal standards. Any time Groupa Ltd's standards exceed the Suppliers, Groupa Ltd's safety standards and policies will be followed while on all Groupa Ltd. jobsites and in Groupa Ltd. offices.

Suppliers must immediately report any and all potentially unsafe condition, behavior, accident or injury, or any environmental or safety concern to Groupa Ltd. management.

Groupa Ltd. enforces a zero tolerance policy for the use of drugs or alcohol in our workplaces, therefore while on Groupa Ltd premises, working on behalf of Groupa Ltd or representing Groupa Ltd alcohol and drug use is not permitted.

Groupa Ltd expects all Suppliers to conduct business in an environmentally responsible way to ensure compliance with applicable standards, laws and regulations.

2) Harassment Policy

Harassment, discrimination, violence, bullying, retaliation, and other disrespectful and inappropriate behavior are not tolerated. Suppliers must maintain policies and procedures to ensure a respectful workplace and comply with any legislated requirements to prevent harassment and violence in the workplace.

3) Integrity & Principles of Business Dealings

All Suppliers doing business for, or with Groupa Ltd. must follow all applicable laws including but not limited to any related to bribery and money laundering.

Suppliers also must not use gifts to gain improper advantage or preferential treatment. Groupa Ltd. expects all Suppliers to maintain records of all gift exchanges, which must be appropriate in the circumstances.

4) Employment Standards

Suppliers must abide by all applicable employment standards, labour, non-discrimination, and human rights legislation.

5) Privacy & Confidentiality

Suppliers must abide by all relevant privacy laws. Suppliers must also only use confidential information obtained through working with Groupa Ltd. for the purpose defined to them. Suppliers must have privacy and confidentiality processes and policies in place in order to protect Groupa Ltd.'s information. If there is a breach, or a suspected breach, in security, Suppliers must notify Groupa Ltd. immediately.

6) Record Keeping

Suppliers must not destroy any Groupa Ltd. records. Suppliers must maintain adequate internal records to ensure proper compliance.

7) Complying with Public Company Policies

In dealings with Groupa Ltd, Suppliers may become aware of inside and confidential information. Suppliers must not disclose inside information regarding operations, financials, and forecasts. Inside information is confidential material, non-public material, that could affect the Groupa Ltd's market price, or information that an investor would consider important in making a decision to work with Groupa Ltd.

8) Duty to Report

Suppliers must report to Groupa Ltd. any concerns they may have regarding Groupa Ltd. related business or conflicts of interest.

9) Compliance with the Code of Conduct

Failure to comply with this Code may result in termination. Groupa Ltd. may require a Supplier to confirm in writing that it meets the requirements of this Code. Groupa Ltd. may monitor and audit a Suppliers compliance with this Code. If the Code is amended, it is the Suppliers duty to have knowledge of the most up-to-date version.