



# Supplier Code of Conduct

## Introduction

At AWA, we embrace our mission in everything we do:

By developing the market together, we will be the first choice in intellectual property for clients and dedicated people everywhere.

Our suppliers form an essential component of our mission. As such, anyone engaging in activities associated with AWA must embrace and enact the principles of business ethics laid out in this Supplier Code of Conduct.

We strive to operate our firm in a manner compliant with the law, ethical business practices, respect for human rights, and adherence to health, safety, and environmental standards. This Supplier Code of Conduct outlines what all AWA suppliers must observe in these respects.

We require all suppliers to sign this agreement, commit to complying with these standards, and meet them in the future.

## Compliance

Suppliers must comply with the laws and regulations in the places where they operate. Should this Supplier Code of Conduct contradict applicable law in any country or territory, applicable law takes precedence and prevails.

In such cases, AWA shall be immediately informed, and alternative arrangements will be sought to follow the principles and spirit of this code.

AWA will take a flexible approach, except in cases where national law or regulations violate general ethical and universal principles.

## General Terms and Conditions

**Our General Terms and Conditions** apply to all services provided by AWA. Your deliveries will amount to your compliance of them. In providing our services, we are also required to observe the codes of conduct applicable to, e.g. the Institute of Professional Representatives before the European Patent Office and/or other relevant national codes of conduct that also apply to our services. As a supplier of AWA, you must therefore comply with our General Terms and Conditions.

## Human Rights and Labour

### 1. Respect and Support of Human Rights

AWA is keen to ensure that everyone working in its supplier network is treated fairly and equitably. All suppliers must support and respect human rights and confirm that they do not take part in human rights violations.

### 2. Forced and Compulsory Labour

AWA does not tolerate any form of forced labour at any of its suppliers. Any person employed or engaged by our suppliers must have voluntarily chosen to do so.

### 3. Discrimination

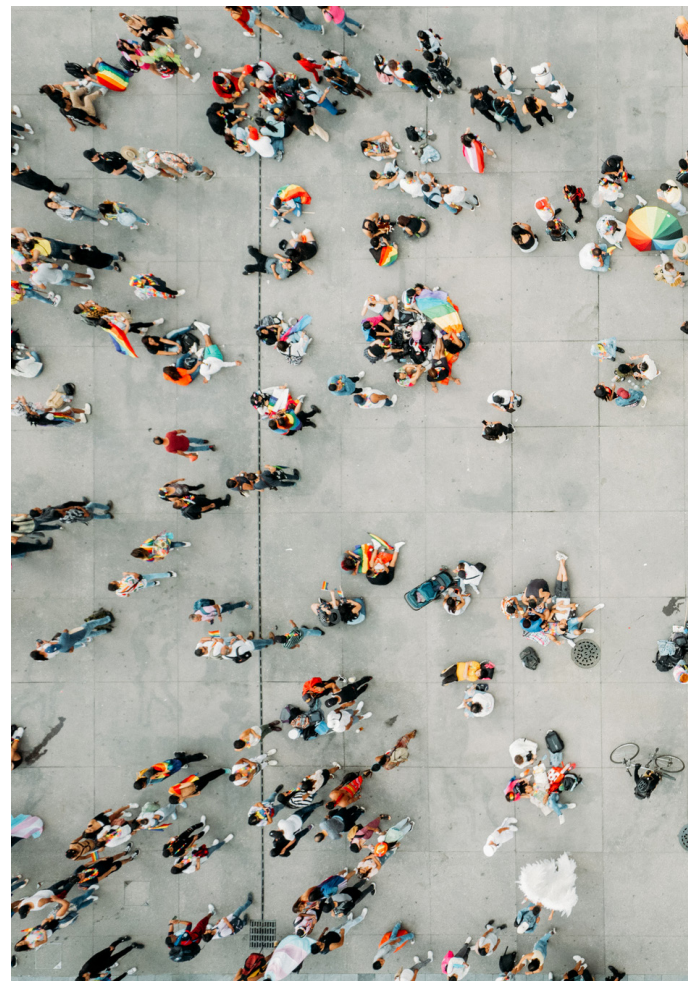
Suppliers must support equal opportunities, fairness, and diversity. AWA does not tolerate discrimination based on gender, orientation, ethnicity, religion or other beliefs, disability, age, etc.

Suppliers shall proactively implement diversity, equity, and inclusion in their activities and operations.

### 4. Equal Pay and Conditions

AWA provides all employees with equal pay and conditions for equal performance when the work done is identical or of equal value and is of comparable difficulty. By this, we mean ensuring that no employee faces salary discrimination.

Suppliers will pay applicable and fair legal wages, including maintaining reasonable employee work hours in compliance with applicable law and international standards.







## Ethics

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### 1. Business Integrity

AWA demands its suppliers comply with all applicable anti-corruption legislation (preferably applicable EU laws), especially to prohibit all and any forms of bribery, corruption, embezzlement or extortion and to have a zero-tolerance policy towards such practices.

Bribery (or any other means of obtaining undue advantage) is neither to be offered nor to be accepted.

### 2. Banking Regulations

AWA expects all its suppliers to comply with the banking regulations required by authorities and institutions, such as the financial supervisory authorities in each country and the EU Commission.

Suppliers are expected to secure any necessary transparency for certain high-risk countries where additional verifications are required for all outgoing payments and inform us when such information cannot be secured. (See Point 3 – Sanctions and Annex 1)

### 3. Sanctions

AWA cannot do business with companies or individuals under sanction or owned or controlled by companies or individuals under sanction (from at least the EU). This includes clients, agents, banks, and other intermediaries. Our suppliers must adhere to this policy as well and where required supply relevant information. (See Point 2 – Banking Regulations)

### 4. Fair Business, Competition and Advertising

AWA expects its suppliers to uphold standards of fair business, advertising and competition. Appropriate means to safeguard customers and confidential business information must be available.

*Please see the dedicated section on information security in this code of conduct for additional information.*

### 5. Whistleblowing

AWA is committed to a culture of openness, integrity, accountability and to conduct safe, fair, environmentally responsible and ethical operations. Our whistleblowing system encourages anyone (including suppliers) to speak up and report any suspected violations, wrongful activities or misconduct.

AWA's whistleblowing channel can be accessed [by clicking here](#).

## Invoice and Payments

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AWA's standard payment terms are 45 days from the last day of the month in which the invoice was received in the correct e-mail inbox ([agentinvoices@awa.com](mailto:agentinvoices@awa.com)).

## Information Security

Information security means ensuring adequate protection against access by unauthorized third parties to information and data in applications and systems and adequate physical protection in buildings and production premises. This requires sufficient equipment and the necessary resources.

**AWA's Privacy Policy** sets out our requirements for handling business information. For all suppliers who are processing information, AWA requires that you adhere to our Privacy Policy and the following requirements:

- ensuring compliance with legal regulations and contractual requirements regarding information security
- implementing an appropriate information security management system (organisation and policies) to meet information security objectives (availability, integrity, confidentiality, and authenticity of information)
- implementing processes ensuring an appropriate management of incidents and a continuous improvement process of information security
- notifying AWA in case of information security-related incidents (privacy@awa.com)
- ensuring secure data exchange in accordance with state-of-the-art encryption and authentication methods; the encryption and authentication methods must be documented and reviewed regularly

- ensuring state-of-the-art patch and vulnerability management for all information security relevant systems
- ensuring that only secure and privacy-compliant cloud services are used when working AWA
- ensuring subcontractors are also formally obliged to comply with the requirements of this code if they receive information or process data relevant to information security.
- AWA reserves the right to review the maturity of processes relevant to information security.

## Anti-Bribery and Corruption

Suppliers shall not tolerate or engage in any form of corruption or influencing, nor shall they directly or indirectly make available, offer, or promise anything of value to, or request this from, a government official or an employee working in the private sector to persuade that official or employee to influence activities or to receive an inappropriate benefit, including facilitation payments.

Suppliers shall refrain from directly or indirectly offering, soliciting or accepting any gift, invitation or other benefit that could influence or be perceived as influencing a business relationship. Suppliers must ensure that the offer or acceptance of gifts, invitations, entertainment or corporate gifts in all business relations is permitted by law or based on regulations. It is only given for a legitimate purpose, is reasonable, and not given to exert influence.

