

MEMORANDUM
GP Memo No. 001-2022

TO : **ALL ICTSI SUPPLIERS**
FROM : **Global Procurement**
SUBJECT : **ICTSI Supplier Code of Business Conduct**
DATE : **October , 2023**

Dear Suppliers,

As part of ICTSI's efforts in ensuring that we conduct our business with the highest ethical standards of honesty and integrity globally, we are launching ICTSI's Supplier Code of Business Conduct. This is aligned with the company's Code of Business Conduct and specifically sets out what is expected of every Supplier working with or on behalf of any ICTSI Business Unit (BU), including BCT Gdynia.

In gist, the Supplier Code of Business Conduct provides that all ICTSI BU Suppliers:

- 1.) must set guidelines to ensure the compliance of its activities and its own subcontractors, representatives, and/or agent's activities with applicable laws and regulations and the Code.
- 2.) must **not** engage in any form of bribery or corruption, directly or indirectly, to any government or public official/candidate or any officer or employee of ICTSI in order to secure an improper advantage or to influence any act or decision of such a person, in order to obtain or retain business for ICTSI.
- 3.) must disclose any potential or actual conflicts of interest to the Deputized Officer (globalhradmin@ictsi.com) and seek prior written approval before engaging in the concerned activity/transaction.
- 4.) must **not** directly or indirectly give to ICTSI Employees/Consultants gifts, in any form, if these influence or could be perceived as influencing the Employee's business judgment or if gift is valued at US\$ 100 or more.
- 5.) must refer to the Code for detailed guidance on all obligations with ICTSI.

In this regard, all Suppliers are kindly asked to complete and return **Appendix 1 - Supplier Conflict of Interest Disclosure Form** to declare any conflicts of interest and certify compliance with the Supplier Code of Business Conduct.

We look forward to your compliance with these policies and procedures.

Thank you.

Sincerely,
BCT Procurement Team
On Behalf Of
ICTSI Global Procurement

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