

SUPPLIER CODE OF CONDUCT WORKING WITH US

We aim for high ethical standards and expect all our employees to operate in an ethical, legally-compliant and professional manner. We expect all our suppliers and potential suppliers to work to the same standards by adhering to this Supplier Code of Conduct and promoting similar standards in their own supply chain.

Business standards

Suppliers should operate under a code of business standards or a similar policy that adheres to industry best practice standards. All laws, rules and regulations in all countries of operation must be complied with and business should be carried out in an ethical, transparent, responsible and respectful manner and in a way which adheres to the highest standards of ethical conduct.

Human rights

Suppliers should have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.

Employees

Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.

All employees must be provided with a clear contract of employment, which complies with local legislation.

All employees must be treated in a fair and equal manner and with dignity and respect.

Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependants, religious belief or political opinion, age, trade union activity and offending background should be prohibited.

All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions. Suppliers should observe the provisions of the International Labour Organization such that any young persons under the age of 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development. No young persons may be employed below the age of 16.

Slavery and human trafficking

All slavery and human trafficking laws must be complied with including, but not limited to, the UK Modern Slavery Act 2015. Suppliers must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships.

Anti-bribery and corruption and facilitation of tax evasion

All anti-bribery, anti-corruption and anti-facilitation of tax evasion laws applicable to your business must be complied with including, where applicable, the UK Bribery Act 2010 and the UK Criminal Finances Act 2017. Suppliers must maintain a policy that prohibits and procedures that prevent:

- any offer, promise, gift or solicitation of an advantage as an inducement or reward to a person for the improper performance of that person's position or as an attempt to influence a person in that person's capacity as a public official;
- any tax evasion, or the facilitation of tax evasion, by an associated person (including without limitation employees); and
- participation in any other form of corrupt practice (such as theft, fraud, conspiracy to defraud, blackmail, participation in a criminal organisation and money laundering) under any circumstances.

Health and safety

Applicable local and national laws and regulations relating to health and safety should be complied with in all countries of operation.

A healthy and safe working environment should be provided for all employees and visitors in accordance with international standards and national laws. Necessary precautions should be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of the supplier's business activities.

Adequate policies and procedures relating to health and safety should be in place, which are either provided to, or accessible by, employees. Appropriate training on health and safety should be provided to employees.

The causes of hazards inherent in the working environment should be removed.

Environmental and social

Applicable local and national laws and regulations relating to the protection of the environment should be complied with in all countries of operation.

Business operations should be managed in line with industry best practice standards and in a responsible and sustainable manner.

Any negative impact on the environment should be continuously reduced, including aiming to reduce the consumption of water, energy (gas, electricity and solid fuels) and other manufacturing and/or office materials and, where possible, encouraging recycling and the use of recycled materials.

Employees should be educated about and encouraged to reduce their impact on the environment whilst at work.

Suppliers should strive to improve the communities within which they operate.