Code of Conduct - ESG Aligned Supplier

For Procurement Teams and Business Partners

1. Purpose and Scope

This Supplier Code of Conduct defines the minimum Environmental, Social, and Governance (ESG) standards required of all suppliers, vendors, contractors, and business partners engaged with the organisation.

It applies to:

- Direct and indirect suppliers
- Subcontractors and outsourced service providers
- Joint venture and strategic partners (where applicable)

Suppliers are expected to comply with this Code or demonstrate equivalent standards.

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2. Environmental Responsibility

Suppliers must actively manage and reduce their environmental impact by:

2.1 Climate and Emissions

- Measuring and reducing greenhouse gas emissions where feasible
- Supporting decarbonisation initiatives and energy efficiency improvements
- Disclosing environmental performance upon request

2.2 Resource Use and Waste

- Minimising waste generation and promoting recycling and reuse
- Reducing water consumption and improving efficiency
- Managing hazardous materials safely and in compliance with regulations

2.3 Pollution and Environmental Protection

- Preventing pollution of air, water, and soil
- Complying with all applicable environmental laws and permits
- Protecting biodiversity in operational and sourcing activities

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3. Social Responsibility

Suppliers must uphold internationally recognised human and labor rights standards.

3.1 Human Rights

- Respect all internationally recognised human rights principles
- Prohibit forced labor, child labor, and human trafficking
- Ensure fair and ethical treatment of all workers

3.2 Labor Standards

- Provide safe, fair, and lawful working conditions
- Pay fair wages and comply with applicable wage laws
- Respect working time regulations and freedom of association

3.3 Health, Safety, and Wellbeing

- Maintain safe workplaces and robust safety management systems
- Provide appropriate training and protective equipment
- Report and investigate workplace incidents

3.4 Diversity, Equity & Inclusion

- Promote non-discrimination in hiring and employment practices
- Foster inclusive workplaces free from harassment or abuse
- Support equal opportunity for all workers

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4. Governance and Ethical Conduct

Suppliers must operate with integrity and transparency.

4.1 Anti-Corruption and Bribery

- Prohibit bribery, corruption, facilitation payments, and kickbacks
- Maintain transparent financial and business records
- Avoid improper influence on procurement decisions

4.2 Conflicts of Interest

- Disclose any actual or potential conflicts of interest immediately
- Avoid relationships that could impair objective decision-making

4.3 Business Integrity and Transparency

- Maintain accurate and complete records
- Cooperate with audits and compliance reviews
- Ensure truthful communication in all business dealings

4.4 Data Protection and Confidentiality

- Protect confidential and proprietary information
- Comply with applicable data protection laws (e.g., GDPR where relevant)
- Use data only for authorised business purposes

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5. Responsible Supply Chain Management

Suppliers are expected to extend ESG principles to their own supply chains:

- Conduct due diligence on subcontractors and upstream suppliers
- Ensure downstream partners adhere to equivalent ESG standards
- Identify and mitigate ESG risks across the supply chain

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6. Monitoring, Audit, and Compliance

- The organisation reserves the right to assess supplier compliance through audits, questionnaires, or third-party verification
- Suppliers must maintain documentation to demonstrate compliance upon request
- Non-compliance may require corrective action plans

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7. Breach of Code

Failure to comply with this Code may result in:

- Mandatory corrective action plans
- Suspension or termination of contracts
- Removal from approved supplier lists

- Legal action where applicable

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8. Reporting Concerns

Suppliers are encouraged to report any suspected violations of this Code through designated compliance channels. Retaliation against whistleblowers is strictly prohibited.

Signed: *E. Smith-Hutchon* Date:01/05/2026

Eric Smith-Hutchon
Director