

Code of Conduct for Suppliers and Sub-Contractors

Purpose

This Code of Conduct sets out the minimum standards expected of all suppliers and subcontractors (“Suppliers”) that provide goods or services. It reflects our commitment to ethical business practices, respect for human rights, sustainable operations, and compliance with applicable laws and regulations.

1. Compliance with Laws and Regulations

Suppliers must comply with all applicable local, national, and international laws, rules, and regulations governing their operations, including but not limited to those concerning labour, health and safety, environment, trade, and anti-corruption.

2. Labour Practices

We expect Suppliers to uphold the rights and dignity of all workers. At a minimum, Suppliers must:

- **Freely Chosen Employment:** Prohibit forced labour, bonded labour, involuntary prison labour, slavery, and human trafficking. Workers must be free to leave employment with reasonable notice.
- **Child Labour:** Not employ children below the legal minimum working age in their jurisdiction and never engage in practices that exploit children.
- **Fair Wages and Benefits:** Provide wages, benefits, and overtime compensation that meet or exceed the minimum standards required by applicable laws and collective agreements.
- **Working Hours:** Ensure that working hours comply with applicable laws and international standards. Excessive overtime must not be required or forced.
- **Freedom of Association:** Respect workers’ rights to join or not join trade unions and to engage in collective bargaining without fear of retaliation, harassment, or intimidation.
- **Non-Discrimination:** Provide equal opportunities and a workplace free of harassment and discrimination based on race, ethnicity, gender, age, disability, religion, sexual orientation, political affiliation, or any other protected characteristic.
- **Safe and Healthy Workplace:** Provide a safe, healthy, and hygienic work environment, including necessary training, protective equipment, and access to clean facilities.

3. Ethical Business Practices

- Integrity and Anti-Corruption: Suppliers must conduct business with honesty, integrity, and transparency. Bribery, corruption, extortion, and embezzlement are strictly prohibited.
- Fair Competition: Engage in fair business practices and comply with antitrust and competition laws.
- Conflicts of Interest: Disclose any actual or potential conflicts of interest in their dealings with our company.

4. Environmental Responsibility

Suppliers must minimize their environmental impact by:

- Complying with applicable environmental laws and regulations.
- Using resources efficiently and responsibly.
- Managing hazardous substances safely and responsibly.
- Striving to reduce waste, emissions, and pollution.

5. Confidentiality and Data Protection

- Suppliers must safeguard confidential information and personal data belonging to our company, employees, and customers, in line with applicable laws and contractual requirements.
- Where appropriate, Suppliers and subcontractors will be required to enter into a Non-Disclosure Agreement (NDA) to ensure adequate protection of sensitive, proprietary, or personal information.
- Confidential information must never be disclosed to third parties without prior written consent and must only be used for the legitimate business purpose for which it was shared.

6. Monitoring and Compliance

- Suppliers must maintain accurate records to demonstrate compliance with this Code.
- We reserve the right to assess and audit Suppliers to ensure adherence.
- Non-compliance may result in corrective actions, suspension, or termination of the business relationship.

7. Supplier Employees' Concerns

Suppliers should provide safe, accessible, and confidential channels for employees to report grievances or concerns without fear of retaliation.

8. Code of Conduct – How to Report A Concern

If a supplier has concerns that our company or a member of our staff may have breached our Supplier Code of Conduct, they are encouraged to report it. Reports can be made via:

- Letter or email to a director of the company

Reports will be taken seriously, investigated promptly, and treated confidentially. We are committed to ensuring that there is no retaliation against individuals who report in good faith.

Acknowledgment

By engaging with us, the Supplier acknowledges and agrees to comply with the principles and expectations set forth in this Code of Conduct.

Signed by

Tony Brooks Director



Steve Walters Director

