



# Fifty5Blue Supplier Code of Conduct



## For all Fifty5Blue people

Fifty5Blue and its companies operate in many markets and countries throughout the world. In all instances, we respect national laws and any other laws with an international reach, such as the UK Bribery Act, the US Foreign Corrupt Practices Act, the UK Modern Slavery Act, and relevant industry codes of conduct such as the UN Guiding Principles on Business and Human Rights. We are committed to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity, in line with Fifty5Blue's Business Principles;

- **We respect each other**
- **We respect difference**
- **We respect the communities we work in, and the wider environment**
- **We respect confidentiality and privacy**
- **We respect the rules**
- **We respect your right to speak up if something isn't right**

We expect and require all our business partners, including suppliers, to have the same commitment to ethical behaviour and therefore ask you to confirm your agreement with our Fifty5Blue Supplier Code of Conduct (in the first column) as amended for non-Fifty5Blue entities (in the second column).

### Fifty5Blue's Supplier Code of Conduct

### What Fifty5Blue expects from its suppliers

#### Section 1 - Company Values and Governance:

- Core principles of business conduct
- International regulation and industry guidance
- Open reporting lines that enables whistle blowers to speak up

We expect all our suppliers to use appropriate systems to facilitate and monitor compliance with internationally recognised Governance standards and adherence to local and applicable international laws.

Suppliers should encourage staff to report concerns without fear of threat or reprisal. Suppliers should take appropriate action as required.

#### Section 2 - Health and Safety:

- Labour laws and human rights
- Health and safety legislation
- Whistle blowing mechanism

We expect all our suppliers to demonstrate their commitment to the principles of this code and to have an on-going process of risk management to identify the environmental, health and safety, and labour practices and ethics risks associated with the suppliers' operations.

#### Section 3 - Social and Environmental:

- Environmental impact
- Contribution to wider society
- Sustainable practices

We expect all our suppliers to demonstrate their commitment to making a positive impact on Environmental and Social matters within their business and their own Supply Chain.

#### Section 4 - Operations:

- Quality standards of products and services
- Systems and protection of intellectual and data privacy property
- Continuous improvement monitoring

Suppliers should put in place equivalent standards to this Code for their own Supply Chain.

# 01 Company Values and Governance

### Fifty5Blue's Supplier Code of Conduct

### What Fifty5Blue expects from its suppliers

We, the officers and staff of all companies in the Fifty5Blue Group ("the Group"), recognise our obligations to all who have a stake in our success including our owners, clients, staff and suppliers.

You confirm that you recognise our obligations and will not act detrimentally to these obligations.

We will not give, offer or accept bribes, whether in cash or otherwise, to or from any third party, including but not restricted to government officials, clients and brokers or their representatives. We will collectively ensure that all staff understand this policy through training, communication and by example.

This applies directly to you.

We will not offer any items of personal inducement to secure business. This is not intended to prohibit appropriate entertainment or the making of occasional gifts of minor value unless the client has a policy which restricts this.

This applies directly to you.

We will not accept for our personal benefit goods or services of more than nominal value from suppliers, potential suppliers or other third parties.

This applies directly to you.

We will not have any personal or family conflicts of interest within our businesses or with our suppliers or other third parties with whom we do business.

You should have equivalent policies in your organisation.

#### Fifty5Blue is committed to:

- Providing and maintaining a culture of open and accountable management
- Conducting business ethically, honestly and within the spirit and letter of the law
- Facilitating open and honest communications whereby all colleagues feel able to raise concerns about actual or potential violations of our internal policies, the law or our regulatory obligations, and trust that any reports raised will be considered and addressed without retaliation.

The Fifty5Blue Right to Speak policy is available to all of our third party supplier partners.

More information on our Right to Speak policy can be found on the **corporate governance** section of fifty5blue.com.

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### 01 Company Values and Governance **continued...**

#### Fifty5Blue's Supplier Code of Conduct

We will consider the potential for clients or work to damage the Group's reputation prior to taking them on. This includes reputational damage from association with clients that participate in activities that contribute to the abuse of human rights.

We will not for personal or family gain directly or indirectly engage in any activity which competes with companies within the Group or with our obligations to any such company.

No corporate contributions of any kind, including the provision of services or materials for less than the market value, may be made to politicians, political parties or action committees, without the prior written approval of the Fifty5Blue Board.

#### What Fifty5Blue expects from its suppliers

This relates only to members of the Fifty5Blue Group.

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You should have your own policy regarding such contributions, together with appropriate authorisation procedures.



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## 02 Health and Safety

### Fifty5Blue's Supplier Code of Conduct

### What Fifty5Blue expects from its suppliers

Information about our business shall be communicated clearly and accurately in a non-discriminatory manner and in accordance with local regulations.

You confirm that you will treat information about the Fifty5Blue Group as described.

We select and promote our people on the basis of their qualifications and merit, without discrimination or concern for race, religion, national origin, colour, sex, sexual orientation, gender identity or expression, age or disability.

You confirm that you have equivalent policies in your organisation.

We believe that a workplace should be safe and civilised and that employment must be freely chosen; we will not tolerate sexual harassment, discrimination or offensive behaviour of any kind, which includes the persistent demeaning of individuals through words or actions, the display or distribution of offensive material, or the use or possession of weapons on Fifty5Blue or client premises.

You confirm that you have equivalent policies in your organisation and for your supply chain, and that you will respect our workplace and people as described.

#### In particular:

- Employment must be freely chosen; forced or bonded labour or any other form of modern slavery must not be used;
- Workers must not be forced to submit passports or government issued identities as a condition of employment;
- Child labour is not to be used;
- Compensation paid to workers must comply with all applicable wage laws;
- Work weeks are not to exceed the maximum set by local law;
- There is to be no inhumane treatment of workers including sexual harassment, sexual abuse, corporal punishment, physical coercion or verbal abuse;
- Fifty5Blue expects its suppliers to create and foster safe working conditions for all workers;
- Worker exposure to physical hazards must be eliminated wherever possible, or, if not, must be controlled;
- Suppliers must have adequate procedures in place to handle emergencies that may affect workers; and

Systems must be in place to manage, track and report occupational injuries and illness.

We will not tolerate the use, possession or distribution of illegal drugs, or our people reporting for work under the influence of drugs or alcohol.

You confirm that you have equivalent policies in your organisation and that you will respect our workplace and people as described.

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# 03 Social and Environmental

### Fifty5Blue's Supplier Code of Conduct

We will continue to strive to make a positive contribution to society and the environment by: maintaining high standards of marketing ethics; respecting human rights in our business, supply chain and through our client work; respecting the environment; supporting community organisations; supporting employee development; and managing significant sustainability risks in our supply chain.

Our Human Rights Policy Statement provides more detail about our commitments in these areas.

### What Fifty5Blue expects from its suppliers

We expect our suppliers to partner with Fifty5Blue on our SBTi carbon reduction commitments and commitments to a diverse supply chain.

#### **You should have equivalent policies in your organization, in particular:**

- Suppliers must comply with requirements of the UK's Modern Slavery Act;
- Suppliers must obtain all relevant environmental authorisations, including for waste and emissions;
- Suppliers should be responsible for implementing business practices to minimise negative environmental and social impacts;
- Suppliers should disclose complete, consistent, and accurate scope 1, 2 and 3 GHG emissions data and set ambitious targets to reduce their carbon emissions over time;
- Suppliers must endeavor to prevent pollution by implementing conservation measures in their facilities and processes, by recycling, reusing and substituting materials;
- Suppliers should measure, manage and address energy usage, seeking and using renewable energy usage wherever possible.

We comply with all applicable international sanctions laws and regulations, including those imposed by the United Nations, European Union, United States, United Kingdom and other relevant authorities.

We have implemented effective screening procedures to ensure that we do not conduct business with individuals or entities that are subject to sanctions. This includes screening customers and supplier partners against relevant sanctions lists and conducting due diligence as necessary.

You must comply with all applicable international sanctions laws and regulations, including those imposed by the United Nations, European Union, United States, United Kingdom and other relevant authorities. You must not engage in any activities that violate sanctions laws, including but not limited to:

- trading with prohibited countries or entities,
- engaging in transactions that facilitate the evasion of sanctions, or providing support to sanctioned individuals or entities.

You must promptly report any potential violations of sanctions laws or the Supplier Code of Conduct to the appropriate authorities within the organization. You should ensure that your subcontractors, agents, and other third parties also comply with sanctions laws and regulations.

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### 03 Social and Environmental **continued...**

#### Fifty5Blue's Supplier Code of Conduct

We will not knowingly create work which contains statements, suggestions or images offensive to general public decency and will give appropriate consideration to the impact of our work on minority segments of the population, whether that minority be by race, religion, national origin, colour, sex, sexual orientation, gender identity or expression, age or disability.

We will not undertake work which is intended or designed to mislead, including in relation to social, environmental and human rights issues.

#### What Fifty5Blue expects from its suppliers

Wherever relevant, you confirm that you have equivalent standards for your work.

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# 04 Operations

### Fifty5Blue's Supplier Code of Conduct

### What Fifty5Blue expects from its suppliers

We will treat all information relating to the Group's business, or to its clients, as confidential. In particular, "insider trading" is expressly prohibited and confidential information must not be used for personal gain.

You confirm that you agree to our policy in respect of our information.

We are committed to protecting consumer, client and employee data in accordance with national laws and industry codes.

You confirm that you have equivalent commitments in your organisation that cover all information from and relating to our business and that of our partners in that business.

We are committed to taking an ethical and responsible approach to the use of artificial intelligence (AI) technologies to ensure that the risk of harm or bias to individuals is minimized and that the risk of negative impact to the data or systems of Fifty5Blue or its clients is minimized. We are committed to complying with AI laws and best practice.

You confirm that you have equivalent commitments in your organization that cover all uses of AI.

We foster a culture of cybersecurity and data protection throughout our supply chain, reducing the risk of data breaches, protecting sensitive information, and maintaining the trust of our customers and stakeholders.

You should comply with all applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR) in the European Union or the California Consumer Privacy Act (CCPA) in the United States.

You should implement robust cybersecurity measures to protect against unauthorized access, disclosure, alteration, or destruction of data. You should ensure that any third-party vendors or subcontractors with access to sensitive data maintain adequate cybersecurity measures. You should conduct due diligence assessments, including security audits and contractual obligations to adhere to specified security standards.

We foster a culture of Continuous Improvement across all of our operations, including monitoring progress against specific KPI targets, and ensuring adherence to current legislation as well as quality, social and environmental standards.

You should implement robust measures to monitor and track Continuous Improvement opportunities and ensure adherence by you and your own supply chain to current legislation as well as quality, social and environmental standards. You must complete a self-assessment on CoC compliance and reaffirm it periodically. You should collaborate with the business to improve performance on code related matters and expect their cooperation.

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