

# **MCBRIDE PLC**

# SUPPLIER CODE OF CONDUCT

As a leader in our field we set the very highest standards for the quality of our products and service we provide, as well as the professional and ethical way we run our business.

We seek to establish mutually beneficial relationships with all of our suppliers and encourage them to match our high standards.

This Code of Conduct should be read in accordance with our corporate policies. All suppliers should recognise that a breach of our corporate policies could be damaging to our business and reputation and that failure to comply may result in termination of contract.

Our corporate policies can be found on our website.

### **COMMITMENT TO ETHICAL TRADING**

We are committed to ethical trading and expect all suppliers to operate to high ethical standards. Suppliers must conduct all business dealings with utmost discretion, integrity and respect for all parties.

We adhere to the provisions of the Ethical Trading Initiative as a minimum standard. In addition, we require every supplier to ensure that the following Codes of Conduct are complied with along with national and other applicable law.

#### SUSTAINABILITY AND THE ENVIRONMENT

Sustainability considerations are an important element in the execution of our strategy and decision making. We favour suppliers who operate in a socially responsible manner.

Suppliers must show commitment to achieving long term sustainability by managing and developing operations and sale of products, without compromising the quality of life for future generations.

### **HUMAN RIGHTS**

We take the issue of human rights seriously and continue to strengthen our policies and management systems in this area. Suppliers must mirror our zero tolerance for slavery and human trafficking and be committed to tackling modern slavery.

Suppliers must prohibit any form of abuse or intimidation including physical abuse or discipline, threat of physical abuse, sexual or other harassment and verbal abuse.

#### DISCRIMINATION

We do not tolerate discrimination based on race, caste, national origin, religion, disability, gender, marital status, sexual orientation, union membership or political affiliation and expect the same of our suppliers.

### **EMPLOYMENT RIGHTS**

Suppliers must ensure that their employment policies comply with local law including restrictions on maximum working hours and voluntary overtime. Wages and benefits paid must meet, at a minimum, national legal standards or industry standards, whichever is higher.

All employees must be provided with a written and understandable contract of employment.

Suppliers must respect freedom of association and the right to collective bargaining. Workers, without distinction, must have the right to join or form trade unions of their own choosing.

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#### **CHILD LABOUR**

Suppliers must prohibit the use of child labour within their business.

#### **HEALTH AND SAFETY**

We recognise that the success of our business is dependent upon the health and wellbeing of our colleagues. We expect our suppliers to have the same commitment to establishing and maintaining effective safety management systems and to ensuring the competence of individuals through the provision of training.

Suppliers must ensure working conditions are safe and hygienic and adequate steps taken to prevent accidents and injury to health.

Suppliers must ensure that their business activities are undertaken in a responsible manner and in accordance with relevant health and safety legislation.

#### **LEGAL COMPLIANCE**

Suppliers must respect customs and cultures and comply with all applicable local and international regulation and legislation. Where there is an apparent conflict between local custom and the principles of this policy, anyone acting on our behalf must be guided by this Code of Conduct.

No supplier may offer or receive, or influence others to offer or receive, any money, gift or hospitality that could be construed as a bribe under the UK Bribery Act 2010 and similar local laws.

Suppliers must have a zero tolerance approach in relation to bribery and corruption, anti-competitive behaviour, insider dealing and breach of legislation and should have adequate policies and procedures in order to identify and prevent such behaviour. We do not work with companies or individuals that infringe the law or endanger our reputation.

Suppliers must observe the requirements of the EU General Data Protection Regulation and any other data protection law or regulation from time to time.

#### CONFIDENTIALITY

Suppliers must have appropriate procedures in place to prevent unauthorised disclosure of confidential information about the McBride Group. Any information shared by the McBride Group should only be used for its intended purpose.

Suppliers must adhere to the relevant confidentiality terms and conditions in their service agreements.

## **CONFLICTS OF INTEREST**

Any interest which may prejudice, or might reasonably be deemed by others to prejudice, the impartiality of suppliers must be formally declared immediately.

# **MONITORING**

If we suspect that a supplier has contravened this Code of Conduct, we reserve the right to monitor them in accordance with applicable legislation and contractual terms and conditions of purchase.

## **REPORTING A BREACH**

Any breach of this Code of Conduct or any of our corporate policies should be reported immediately to the McBride Group. Breaches will be investigated and appropriate actions taken to ensure non-compliance does not re-occur.

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