

Supplier Code of Conduct

Unless the context requires otherwise, the definition and interpretation of “we”, “Company” or “the business” shall mean Eurostar Group Holdings Limited together with its related companies and subsidiary companies.

We are committed to conducting business with integrity, ethics and social responsibility. We expect our suppliers and business partners to share and uphold these principles with their own suppliers participating in the supply chain of goods and services to us. This Supplier Code of Conduct outlines the standards and expectations we hold for our suppliers in areas such as ethics, labour practices, environmental responsibility and business integrity.

1. Ethical Behaviour

Suppliers are expected to uphold the highest standards of ethical behaviour in all their business activities. This encompasses, but is not confined to, honesty, fairness and transparency in their dealings with us and our stakeholders.

2. Compliance with Laws and Regulations

Suppliers must adhere to all relevant laws and regulations in the regions where they operate, including but not limited to labour laws, licences, permits, registrations, environmental regulations and anti-corruption laws. Suppliers are also expected to conform to international standards and conventions where applicable.

3. Labour Practices

- a. Child Labour: Suppliers must not employ child labour, as defined by the International Labour Organisation (ILO) conventions, in any of their operations.
- b. Forced Labour: Suppliers must not engage in or support forced or involuntary labour in any form, including debt bondage, human trafficking, or slavery.
- c. Fair Wages: Suppliers are expected to pay wages that meet or exceed the legal minimum wage and provide fair compensation to employees based on their skills and experience.
- d. Working Hours: Suppliers must adhere to legal limits on working hours and provide employees with reasonable working conditions.
- e. Freedom of Association: Suppliers should respect the right of employees to join or form labour unions or other worker organisations in line with applicable laws.

4. Health and Safety

Suppliers must provide a safe and healthy work environment for their employees. This includes maintaining safe facilities, providing necessary safety equipment, and implementing safety protocols to prevent accidents and injuries.

5. Environmental Responsibility

- a. Compliance: Suppliers must comply with all relevant environmental laws and regulations in their operations.
- b. Sustainability: Suppliers are encouraged to adopt environmentally sustainable practices, such as waste reduction, energy efficiency and responsible sourcing of materials.
- c. Pollution Prevention: Suppliers should take measures to minimise pollution and reduce the environmental impact of their activities.

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	Author:	Catherine Franklin	Authorised by:	Brett Watmough

6. Business Integrity

- a. Anti-corruption: Suppliers must not engage in any form of bribery, corruption, or unethical practices in their interactions with us or any other parties. This includes adherence to the Bribery Act 2010.
- b. Competition: Suppliers must compete fairly and ethically in the marketplace, avoiding anti-competitive practices such as price-fixing and market manipulation.

7. Confidentiality

Suppliers may have access to confidential information about us and our operations. Suppliers must respect and protect this information and use it only for the purposes agreed upon in their business relationship with us.

8. Human Rights

Suppliers are expected to respect and support the fundamental human rights of their employees and the communities in which they operate, in line with the Modern Slavery Act 2015.

9. Continuous Improvement

Suppliers are encouraged to continually enhance their social and environmental performance and collaborate with us to identify opportunities for improvement.

10. Reporting and Accountability

Suppliers should establish mechanisms for reporting violations of this Code and take appropriate corrective actions. We may conduct audits and assessments to verify compliance with this Code.

From time to time, we may be under an obligation with a specific customer to 1) abide by such customer's code of conduct and 2) to cascade that arrangement to our business dealings with others. In such cases, we will inform of any additional requirements which will become binding under this Code of Conduct.

By entering into a business relationship with us, or by accepting a purchase order from us, suppliers acknowledge their commitment to adhering to this Supplier Code of Conduct and will work towards its principles and objectives.

If you have any legal or ethical issue involving this Code to discuss and resolve, you can do so by contacting us in writing at the following address: Unit 4, Evolution, Lymedale Business Park, Hooters Hall Road, Newcastle under Lyme, Staffordshire, England, ST5 9QF.

Organisation Name		Number of employees	
Print Name		Job Title	
Sign Name		Date	
Email address		Contact number	

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