



Supplier Code of Conduct

Introduction

This Supplier Code of Conduct (“Code”) sets out the standards which are to be adhered to by all Suppliers and reflects the Corporate Social Responsibility principles that have been set by the Ceuta Group.

We must ensure that Suppliers with whom we deal with live up to our values and standards. We require Suppliers to comply with the Code and to use all reasonable endeavours to ensure it is maintained and enforced within their own supply chains.

The cooperation between Ceuta Group and its Suppliers is based on trust, mutual respect, openness, a fair balance of reciprocal interests and equal opportunities. Both parties understand that the safeguarding of social and environmental standards described in this Code is the foundation for mutual, lasting and successful cooperation.

Ceuta Group reserves the right to verify the Supplier’s compliance with the Code. Where Supplier reviews demonstrate shortcomings in any of these areas, the Supplier should strive to implement a time-bound programme of improvement leading to conformance.

Ceuta Group reserves the right to terminate an agreement with any Supplier and/or Representative that does not comply with the Code of Conduct.

1. Complying with Laws and Regulations

Suppliers shall comply with all applicable laws and regulations of the countries in which operations are managed or services provided and with all International trade laws and applicable import/export control laws and regulations, including embargoes, sanctions and anti-boycott rules.

2. Respecting Fundamental Human Rights

Suppliers are expected to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all and foster an inclusive and ethical culture in accordance with the relevant International Labour Organisation (ILO) conventions.

Illegal child labour is not to be used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed provided the legal age is consistent with the minimum working ages defined by the International Labour Organisation (ILO).

Suppliers are expected to ensure that their workers are afforded an employment environment that is free from physical, psychological, and verbal harassment, or any other abusive conduct.

Suppliers are expected to provide equal employment opportunity to workers and applicants without discrimination.

Workers must be paid at least the minimum compensation required by local law and be provided with all legally mandated benefits. Deduction from wages as a disciplinary measure should not be permitted.



The rights of workers must be respected, to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. Suppliers are also expected to recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing.

Suppliers are expected to comply with the Modern Slavery Act 2015 and all laws and regulations prohibiting human trafficking and forced or indentured labour. It is expected that measures are implemented to ensure that modern slavery, child labour and human trafficking are not taking place in their supply chains, or in any part of their business.

Whistle-blower protection must be provided for workers, with avenues of raising legal or ethical issues without fear of retaliation. Suppliers are also expected to take action to prevent, detect and correct any retaliatory actions.

5. Preventing Fraud and Corruption

Suppliers must comply with all applicable anti-corruption and anti-money laundering regulation laws that govern operations in the countries in which they do business. If no such laws apply or are of a lesser standard to that prescribed in the UK Bribery Act 2020, Suppliers must adhere to the UK Bribery Act and/or the US Foreign Corrupt Practices Act laws, and if applicable, refer to the OECD guidelines for Multinational Enterprises.

Any form of or attempt at corruption including blackmail and bribery as well as other illegal practices, shall not be tolerated within the business relationships. Suppliers are expected to exert reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships and the hiring of intermediaries such as agents or consultants.

Suppliers shall neither directly nor indirectly offer, promise, guarantee or demand bribes or other unjustified enrichments in order to obtain or retain an order or other unfair advantage. Equally, no bribes or other unjustified enrichments may be demanded or expected from Suppliers.

Suppliers must not fix prices or rig bids with their competitors.

6. Ensuring the Security of Assets through the Respect for Confidentiality

Suppliers are to ensure company assets are managed securely.

Handling of personal data must be handled in accordance with applicable laws and regulations, including General Data Protection Regulation (GDPR). Suppliers must take all reasonable measures to prevent confidential information from being disclosed to any person who does not need or have the right to that information.

Confidential information, including personal information, must be protected from unauthorised access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures.



7. Identification and Controlling of Environment Risks in Relation to Business Activities

Suppliers must ensure that their operations maintain all the appropriate environmental permits and approvals, and that their operations are conducted in an environmentally responsible manner and in accordance with applicable environmental laws.

Suppliers should consider the environmental impact of their operations and seek to reduce their carbon footprint, reduce energy, water and waste wherever possible.

8. Ensuring Safety of Persons during Business Activities

Suppliers are expected to provide a safe, healthy and secure working environment and understand the health and safety risks of their activities. Suppliers are also expected to meet the requirements of all applicable occupational health and safety regulations and abiding all local laws. Good health and safety management systems should be in place, in accordance with the applicable legal framework with training and practices for workers, contractors, visitors and those in the community affected by their activities.

General Disclaimer

This Supplier Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. Unless otherwise stated in such contract, in the event of a conflict, Suppliers shall adhere to the contract terms.