

EST. 1975



# RIGBY

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SUPPLIER CODE  
OF CONDUCT

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## Contents

Supplier Code of Conduct .....	3
1 Business Integrity .....	3
2 Legal Compliance .....	3
3 Human Rights and Fair Treatment .....	3
3.1 Discrimination .....	4
3.2 Wages and working time .....	4
3.3 Freedom of association .....	4
3.4 Child labour .....	4
3.5 Voluntary labour .....	4
3.6 Safeguarding vulnerable groups .....	4
3.7 Modern Slavery .....	4
4 Health and Safety .....	5
5 Information Security and Data Protection .....	5
6 Anti-Corruption Measures .....	5
7 Prevention of the Facilitation of Tax Evasion .....	6
8 Corporate Social Responsibility .....	6
9 Supply Chain Compliance .....	6

## Supplier Code of Conduct

At Rigby Group (RG) plc “RG” our mission is to create a sustainable, profitable, technology-focused business by working hard and giving back, delivering long-term benefits for our stakeholders. We value the way we do business, acting with integrity and in line with our social responsibility in a sustainable way. We are committed to conducting our business in compliance with all applicable laws and have developed this Supplier Code of Conduct to support this commitment. We believe this ensures that as a company we will deliver long-term social, environmental, and economic benefits for the businesses and communities in which we operate.

While RG appreciates that its suppliers and contractors (each referred to herein as suppliers) may all operate in a variety of different legal, geographical, and cultural environments, we do still expect all suppliers to comply with this Code of Conduct and hope that our suppliers will also strive to exceed these expected standards. We expect these standards to be implemented throughout our supplier’s businesses and within their own supply chains.

The standards expected of RG’s suppliers set out in this Code of Conduct are in addition to, and not in lieu of, any applicable statutory or regulatory obligations and the provisions of any legal agreement or contract between a supplier and RG. References to statutory and regulatory compliance applies to all countries within which our suppliers operate.

RG’s Supplier Code of Conduct encompasses nine main expectations.

### 1 Business Integrity

RG is committed to the highest standards of business integrity. We expect our suppliers to adopt the same high standards and we do expect that our suppliers will not tolerate any practice that is inconsistent with the principles of honesty, integrity and fairness, anywhere you do business. Any potential conflicts of interest with RG employees or our customers or end customers should be disclosed to RG. RG also expects suppliers to abide by competition laws and compete fairly. RG strives to partner with suppliers that are proud of their reputation for fair dealing and quality delivery. RG expects suppliers to be protective of RG’s reputation just as much as their own. No RG supplier should bring RG or its employees, customers or suppliers into disrepute by engaging in any act or omission which is likely to diminish the reputation of RG or our employees, customers and other suppliers.

### 2 Legal Compliance

RG expects all of its suppliers to comply with all applicable international, national and regional laws, statutes and regulations from time to time in force. This includes, but is not limited to, laws, statutes and regulations relating to human rights, employment, health and safety, environment, information security, data protection, anti-bribery and corruption and prevention of the facilitation of tax evasion.

### 3 Human Rights and Fair Treatment

RG expects all of its suppliers to conduct their activities in a manner that respects human rights. This means complying with the fundamental rights granted to workers under applicable local laws, including in the United Kingdom the Modern Slavery Act 2015. This also comprises taking due account of local laws and providing appropriate protection in the following areas:

### 3.1 Discrimination

RG expects that its suppliers will ensure a safe, respectful working environment for all of its workers which is free from all forms of discrimination, abuse and harassment.

### 3.2 Wages and working time

RG expects that its suppliers will ensure that its workers are engaged in compliance with all applicable laws and mandatory industry standards pertaining to working hours and wages. In particular, RG expects its suppliers to pay their workers on time and in accordance with applicable legal requirements.

### 3.3 Freedom of association

RG expects that its suppliers will observe all applicable laws regarding collective representation and ensure all workers are free to form or join a workers council or other employee trade union body.

### 3.4 Child labour

RG expects that its suppliers will comply with all applicable child labour laws and under no circumstances employ workers under the age of 15 or under the minimum age for work as specified by applicable law. RG requires its suppliers to have in place appropriate processes to verify the age of new employees in order to ensure compliance with applicable child labour laws and the International Labour Organisation's Convention concerning Minimum Age for Admission to Employment.

### 3.5 Voluntary labour

RG expects that its suppliers will employ all workers on a voluntarily basis and no workers should be subject to any form of forced, involuntary or debt-bonded labour.

### 3.6 Safeguarding vulnerable groups

RG expects that its suppliers will make sure that vulnerable groups are treated with courtesy and that their dignity, safety, security and well-being is treated as a priority concern at all times. RG also expects its suppliers to ensure safe surroundings and working practices. RG suppliers should protect against any kind of threat to vulnerable groups, which includes children, young persons or adults at risk.

### 3.7 Modern Slavery

RG expects its suppliers to:

- (a) comply with all applicable anti-slavery and human trafficking laws, statutes, regulations from time to time in force including but not limited to the Modern Slavery Act 2015;
- (b) not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 where such activity, practice or conduct is or were carried out in the UK;
- (c) take appropriate steps to ensure that they do not cause RG to breach its own Modern Slavery legislation;
- (d) include in contracts with its own suppliers and contractors suitable provisions which are at least as comprehensive as those set out in the Modern Slavery section of this Code of Conduct;
- (e) notify RG as soon as it becomes aware of any actual or suspected slavery or human trafficking in a supply chain which has a connection with its arrangements with RG; and
- (f) maintain a complete set of records to trace the supply chain of all goods and services provided in connection with its agreements with RG.

## 4 Health and Safety

RG expects its suppliers' operations, facilities and procedures to protect and promote worker health and safety and provide their workers with a safe and healthy working environment. RG suppliers must comply with all applicable laws in relation to health and safety and environmental protection. RG suppliers must identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal. RG suppliers must comply with material restrictions and product safety requirements set by applicable laws and regulations, as well as ensuring workers are aware of and work in accordance with all appropriate safety practices.

## 5 Information Security and Data Protection

RG Suppliers must protect all information and data received from RG or its customers and their customers in the course of doing business with RG and in accordance with industry recognised good security practises, legislation, regulation and contractual obligations. Such information and data must be kept confidential at all times and not used for any purposes other than the business purpose for which it was provided or made available. All such information and data must be kept confidential and protected from any unauthorised access, destruction, use, modification and disclosure, through appropriate organisational and technical controls.

RG aims for the highest standards concerning the protection of any personal data that may be processed by suppliers on behalf of RG, our customers and their customers so we consider that it is important to maintain these standards irrespective of whether:

- (a) you receive a data processing instruction directly from RG (when RG are a data processor and delegate the instructions provided by the customer or their customer to you); or
- (b) you receive a data processing instruction directly from a customer or their customer (when the customer or their customer decides to give you access to their personal data for you to process it or access it, so that you can carry out a particular task or activity)

and in each of these circumstances RG always expects that its suppliers comply with applicable data protection legislation and implement industry accepted security standards (whether appointed as a sub-processor by RG or appointed as a processor by an RG customer or their customer).

Wherever suppliers are aware of a security and/or data privacy incident that affects or has the potential to affect RG or its customers or their customers, they must inform RG immediately.

## 6 Anti-Corruption Measures

In addition to all statutory and contractual obligations and prohibitions on RG suppliers, including without limitation in the United Kingdom the Bribery Act 2010, this Code of Conduct also expressly prohibits any and all forms of bribery, corruption, extortion or embezzlement and RG suppliers are expected to ensure that they have adequate procedures in place to prevent bribery in all commercial dealings undertaken by them. RG adopts a zero tolerance approach to corruption and we require our suppliers to also adopt the same zero tolerance approach when conducting business with RG.

RG expects that any actual or suspected incident of corruption, including; bribery, facilitation, fraud, money laundering or theft, which affects RG or its customers or end customers will be reported to RG with appropriate details of the circumstances, root cause, impact, action taken or to be taken and timescale. Under no circumstances should any invitations or gifts should be given to RG or its customers or end

customers in order to gain any form of undue influence or advantage. In addition, no order for goods, services or otherwise should be accepted from RG where the order is conditional on the supplier conferring a payment or other benefit to either an RG employee or to that RG employee's direction.

Supplier's must also not do or omit to do anything which may cause RG or its workers to be in breach of its own anti-bribery and corruption policies. It is imperative that RG suppliers implement appropriate governance and controls in order to detect and prevent fraud, misrepresentation or money laundering. RG expects its suppliers to not make false or misleading statements or submit false claims in conducting business.

## 7 Prevention of the Facilitation of Tax Evasion

RG expects its suppliers to:

- a) comply with all applicable laws, statutes, regulations, guidance, recognised practice and codes, relating to the prevention of tax evasion and/or the prevention of the facilitation of tax evasion (whether within, or outside of, the United Kingdom) including but not limited to the Criminal Finances Act 2017 ("CFA 2017");
- b) have in place (and at all times maintain) policies and procedures, including prevention procedures under the CFA 2017, to ensure continued compliance with the CFA 2017 and have taken steps, so far as it is reasonably practicable to do so, to ensure that its associated persons have adhered to such policies and procedures.

## 8 Corporate Social Responsibility

Corporate social responsibility (CSR) is extremely important to RG and we therefore require our suppliers to be good corporate citizens. RG suppliers should uphold the same values and strive where possible to support significant CSR policy areas, such as sustainability, life cycle assessments, carbon foot printing (where applicable), diversity and inclusion, prompt payment, support of the Armed Forces Covenant, apprenticeships and skills development.

## 9 Supply Chain Compliance

Finally we ask our suppliers to regularly monitor their own supply chain's compliance with this Code of Conduct and to immediately notify RG of any issues or concerns that may arise. Compliance with this code may be monitored by RG through routine and ad hoc supplier reviews and questionnaires as well as requests for information and site inspections as well. If RG determines that a supplier has violated this code we will require that supplier take corrective action and provide appropriate supporting evidence to demonstrate rectification. RG also reserves the right to suspend or terminate any relationship with a supplier for breach of the requirements of this Code of Conduct.