

Supplier code of conduct

Building trust in a digital
world, the right way.

GBG

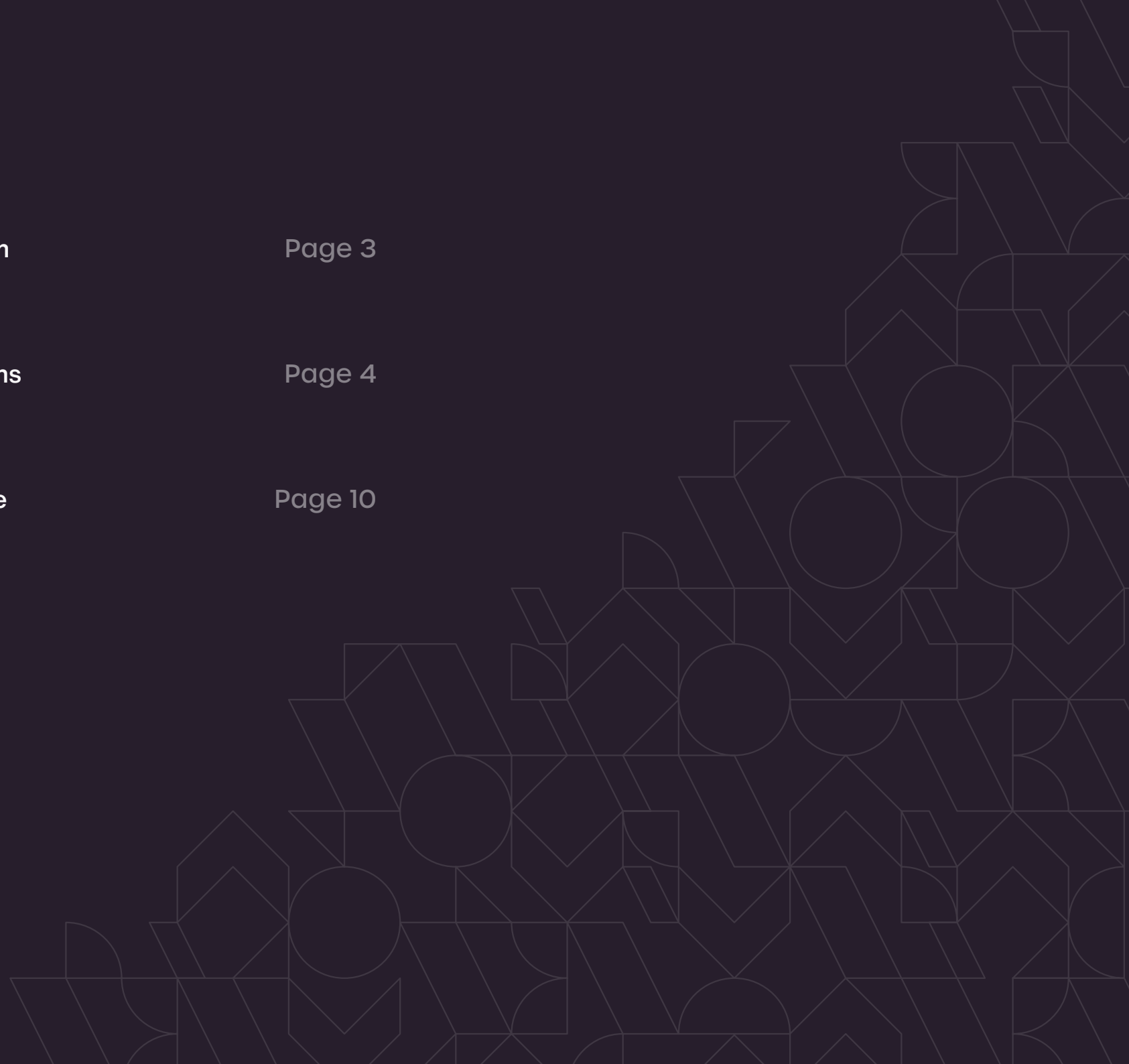


Contents

01 Introduction Page 3

02 Expectations Page 4

03 Compliance Page 10



Introduction

At GBG we are extremely privileged to work with a high quality and trustworthy supply chain of thousands of suppliers globally.

We look upon our suppliers as an integral part of our operations and ambitions. Without a healthy and secure supply chain, we would not have grown to where we are today. It is important that GBG and our suppliers work collaboratively together with shared values and goals to benefit not only our own organisations but to additionally benefit the environment and the wider community.

GBG's purpose is to build trust in a digital world, a world where our customers can transact online with confidence and we have high standards of business and ethical behaviour. We are committed to the responsible sourcing of goods and services.

The GBG Supplier Code of Conduct is embedded into our group procurement policy, processes and standard legal documentation and applies across the full GBG supplier base including its affiliate entities. It applies to suppliers, sub-contractors, consultants, agencies, and also their respective supply chains.

We expect all of these groups to work with GBG in order to ensure its high standards are maintained, always behaving honestly, ethically, fairly and with integrity at all times. GBG expects its suppliers to have ethical governance policies and processes in place and take appropriate action where violated.



GBG are committed to being a responsible, sustainable, ethical, environmentally-aware, inclusive, safe, secure, compliant, and innovative organisation. This GBG Supplier Code of Conduct sets out our minimum expectations in respect of supplier behaviours, commitments and integrity. It is important that our suppliers understand and align with these standards and seek to protect GBG's reputation as much as their own.

Health and Safety

GBG are committed to providing and maintaining a healthy and safe working environment and conditions and managing health and safety effectively to protect our team members and other persons with whom we interact because we recognise that we have not only a moral and legal duty, but also that our team members are our greatest asset.

Our suppliers are expected to:

- comply with GBG health and safety policy and processes when visiting a GBG location.
- take responsibility for the health and safety within their own employees' working environments.
- have a robust health and safety policy and provide adequate health and safety training to their employees and visitors.
- have a clear and effective reporting process for employees to report safety issues (preventative) and incidents (reactive) so that they can be acted upon swiftly and effectively.

Gifts, Hospitality and Conflict of Interest

The giving and receiving of gifts and hospitality is a permissible practice however it is important that no conflict of interest exists or is created by the giving or receiving of gifts or hospitality.

It is important that nothing of inherent value is given or received for the purpose of influencing a decision, securing an advantage or obtaining and or retaining business.

Our suppliers are expected to:

- ensure that motives for giving gifts or offers of hospitality are appropriate and not given with the purpose of obtaining or retaining business.
- make GBG aware if there are any concerns about the nature of any gifts or hospitality received or offered.
- ensure that there is no conflict of interest as to be likely to prejudice their independence and objectivity.
- disclose any conflicts of interest to GBG and co-operate with GBG to avoid or remove the conflict.

Inclusion, Diversity and Equal Opportunities

GBG promotes and supports inclusion and diversity in the working environment and fosters a culture where everyone in the organisation is valued as an individual.

We have zero tolerance towards bullying, harassment, discrimination, victimisation and other unacceptable behaviour within the workplace.

Our suppliers are expected to:

- be committed to promoting and supporting workplace diversity and to creating an environment that values and utilises the contributions of people with different backgrounds, experiences and perspectives. This includes no employee discrimination on the grounds of age, disability or carer status, gender, relationship status, race or ethnicity, sexual identity or orientation, maternity/paternity, religion or beliefs.
- be inclusive and value fairness, equity and diversity consistent with applicable laws and regulations such as the Equality Act 2010 or equivalent local Act.
- where suppliers have more than 250 UK-based employees, publish their gender pay gap details as required by law.
- have fair and equitable policies and processes in place relating to hiring, promotions, training and development of all employees, ensuring equal access for all. ensure its own employees treat others with respect.
- actively discourage discrimination or harassment within the workplace and have an effective disciplinary procedure in place for unacceptable behaviours.
- have a clear and effective process for complaints/whistleblowing.

Human Rights

At GBG, we respect and protect human rights.

These include the right to life, liberty and security; equal rights of men and women; the right to protection against discrimination, slavery, servitude, torture, or inhumane or degrading treatment; and freedom of speech, thought, conscience and religion.

We are committed to improving our practices and to prevent, address and mitigate the risk of modern slavery and human trafficking within our own operations and that of our supply chains. GBG's Modern Slavery Statement can be found [on our website](#).

Our suppliers are expected to:

- protect and respect human rights at all times, ensuring to the best of its knowledge that within its own organisation and its supply chain that steps are in place for preventing, addressing and mitigating modern slavery, human trafficking, forced labour, child labour, physical abuse or corporal punishment and that working conditions are reasonable (e.g. living wages that meet legal standards or industry benchmarks, reasonable working hours, safe and secure working environment, acceptable living conditions, workers' rights, employment is freely chosen, maximum working hours etc).
- comply with GBG's modern slavery statement and have their own modern slavery statement applicable to their organisation, where required.
- have an understanding and comply with all applicable anti-slavery and human trafficking laws and regulations including but not limited to the Modern Slavery Act 2015 or equivalent Act.
- be open and transparent in dialogue with GBG or relevant authorities, when reporting any human rights violations and what steps are taken to remediate and prevent repeat violations.
- have an open attitude towards employee rights to join or form trade unions of their own choosing and to bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, they will facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

Environment, Social & Governance ('ESG')

Our focus on ESG is an essential part in all that we do at GBG and is an integral part of our business and strategy.

We have aligned our ESG programme with the United Nations Sustainability Development Goals ('SDGs') to contribute to meaningful progress and link our commitment to global action.

You can find further information on our chosen SDGs and wider ESG impact [on our website](#) and in the [ESG Statement of our Annual Report and Accounts](#).

Our suppliers are expected to:

- employ reasonable measures to reduce the negative effects their goods and/or services have on the environment and society.
- take action to measure its greenhouse gas emissions and seek cost-effective reduction methods.
- use environmentally sustainable products and services wherever possible.
- eliminate waste, recycle and re-use wherever possible.
- promote resource conservation by striving for maximum energy efficiency where applicable.
- pursue longer-term sustainability ambitions to further increase their positive impact on the environment and society.

Anti-Bribery and Corruption

At GBG, we are committed to ensuring that there are no bribery and corruption practices within any part of our business, including our supply chain.

Our suppliers are expected to:

- comply with all applicable laws, statutes, and regulations relating to anti-bribery and anti-corruption including but not limited to the Bribery Act 2010 or equivalent Act.
- have and maintain in place its own anti-bribery and corruption policies and procedures to ensure compliance and enforce them where appropriate.
- disclose any instances of bribery or corruption to GBG and take action as appropriate.

Anti-Tax Evasion

At GBG, we are committed to ensuring that there are no fraudulent practices within any part of our business, including our supply chain.

Our suppliers are expected to:

- not engage in Tax Evasion of any kind in any territory nor facilitate tax evasion of any kind in any territory.
- implement reasonable prevention procedures to prevent the Facilitation of Tax Evasion in accordance with the Criminal Finances Act 2017 or any equivalent legislation in other territories.
- notify GBG of any tax-evasion incident it becomes aware of.

Competition Laws

At GBG, we believe in free and fair competition.

Our suppliers are expected to:

- comply with appropriate competition laws and compete ethically and fairly.
- never discuss GBG confidential information with GBG competitors.
- not use a position of influence to unfairly disadvantage any other supplier or reduce the potential for future competition (e.g. a bespoke solution locking in only your services going forward, etc).

Information Security Risk Management

GBG has strict information security policies and procedures in place applicable across all parts of our business so as to mitigate data/system risk to GBG.

Where relevant to what is being provided, our suppliers are expected to:

- safeguard the integrity and security of their systems and comply with relevant Information Security standards and guidance as appropriate including but not limited to the latest ISO27001 and ISO27002 ISO standards, **OWASP**, **Cloud Security Alliance**, etc.
- inform GBG without undue delay if they become aware of any information security incident that affects or has the potential to affect GBG data.

GBG's ISMS-29 Third-Party Information Security Policy sets out GBG's minimum technical and physical security requirements for any third party that has access to any GBG facility, network or system and/or that collects, manages, processes, transmits and/or stores GBG data as part of the services being supplied. The policy is available on request.

Data Protection

GBG has strict privacy policies and procedures in place applicable across all parts of our business to mitigate data privacy risk to GBG.

Our suppliers are expected to:

- comply with applicable data protection law, which can be evidenced if asked.
- only process data for the purpose for which is has been provided.
- keep data securely and not share more widely.

Compliance

GBG expect suppliers to regularly monitor their own, and their supply chain's compliance with this Supplier Code of Conduct.

Suppliers are to immediately notify their primary GBG contact or email group.procurement@gbgplc.com of any concerns or incidents that arise.

Compliance with this code may be monitored by GBG through routine and/or ad hoc supplier reviews, questionnaires and/or site audits.

Following an incident, GBG will require the supplier to appropriately report the concern and advise what corrective action it will take to address the issue, what steps to prevent reoccurrences and what measures have been put in place to remediate.

GBG will support the supplier as much as possible. If it is a major or severe incident that cannot be remedied, GBG will discuss the most appropriate next steps with the supplier and/or any relevant authorities.



GBG

Group Procurement Team

www.gbgplc.com

© Copyright 2023 GB Group plc ('GBG'). All rights reserved.

