

Ethical Trading Policy & Supplier Code of Conduct

1. Policy Summary and Objectives

Groupe Atlantic UK Division (GAUK) recognises that as one of the market leading companies we must adhere to the highest standards of ethical conduct. We aim to integrate our own corporate values of Integrity, Disciplined Approach, Excellence, Learning and Innovation with those of the wider stakeholder group which includes, employees, and suppliers, the community and the environment.

We shall uphold the values of honesty, partnership and fairness in our relationships with stakeholders. By adopting a holistic approach to business, we recognise that our social, governance and environmental responsibilities to these stakeholders are integral to our success. We aim to demonstrate these responsibilities through our actions and within our corporate policies as they relate to our Procurement and Sourcing activities.

The ultimate responsibility for the implementation of this policy and the achievement of our objectives rests with the Chief Executive Officer. The Human Resources Department will coordinate activity across the Group.

2. Scope of the Policy

This policy applies to all employees and suppliers and sets out the minimum ethical trading standards which must be attained and maintained. In accordance with the 10 Principles of the UN Global Compact which is seen as the global gold standard for such matters the policy will cover aspects of Ethical Trading relating to Human Rights, Labour, Environment, Anti-Corruption and Health and Safety

3. Standards and Aims

3.1 – Human Rights – suppliers shall

- 3.1.1 Support and respect the protection of internationally proclaimed human rights; and
- 3.1.2 Ensure that they are not complicit in human rights abuses.

3.2 – Labour - suppliers shall

- 3.2.1 Uphold the freedom of association and the effective recognition of the right to collective bargaining; and
- 3.2.2 Ensure the elimination of all forms of forced and compulsory labour as addressed by the Modern Slavery Act 2015;
- 3.2.3 Actively support the effective abolition of child labour throughout all tiers of supply chains supplying product in to the business;
- 3.2.4 Eliminate discrimination in respect of employment and occupation and any other grounds and promote equal opportunities within their businesses;

3.3 – Environment - suppliers shall

3.3.1 Understand the environmental impacts of their activities, products and services to identify any risks they present to or from the environment; and any opportunities that can be developed in partnership with GAUK;

3.3.2 Undertake initiatives to promote greater environmental responsibility. Suppliers should seek to minimise the consumption and use of materials and practices known to be harmful to the environment and promote the use of sustainable practices and materials wherever possible throughout the supply chain; reduce the amount of disposable packaging in the supply chain wherever possible and ensure that all packaging is as full recyclable as possible. Suppliers should aim to meet the requirements of ISO14001; and

3.3.3 Encourage the development and diffusion of environmentally friendly technologies;

3.3.4 Contribute positively to their local community and environment by operating in a manner that meets or exceeds the ethical, legal, commercial, and public expectations that their society has of business.

3.3.5 Suppliers shall ensure they have an effective process in place for maintaining legal compliance with all environmental legislation, regulation and permit requirements to which it is subject or subscribes. Suppliers shall inform GAUK immediately of any environmental prosecutions or major site incidents that have the potential to significantly impact the environment.

3.4 – Anti-corruption & Business Ethics - suppliers shall

3.4.1 Work against corruption in all its forms, including extortion and bribery as required by the UK Bribery Act 2010;

3.4.2 Accurately record information regarding its business activities, labour, health and safety and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties;

3.4.3 Respect intellectual property rights and safeguard customer information. The supplier shall manage technology and know-how in a manner that protects intellectual property rights;

3.4.4 Provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Suppliers shall protect whistle-blower confidentiality and prohibit retaliation.

3.5 – Health and Safety Management - suppliers shall

3.5.1 Identify, evaluate and manage occupational health and safety hazards through a process of hazard elimination and controls. Suppliers shall provide workers with job related, appropriately maintained personal protective equipment and instruction on its proper use;

3.5.2 Identify and assess potential emergency situations and develop plans and response procedures that minimise harm to life, environment and property;

3.5.3 Have a system for workers to report health and safety incidents and near misses, as well as a system to investigate, track and manage such reports. Corrective action plans shall be implemented to mitigate risks;

3.5.4 Control worker exposure to tasks that pose ergonomic risk;

3.5.5 Provide workers with reasonably accessible and clean toilet facilities and potable water.

4. Action Plan

This policy is deployed to ensure the highest standards of conduct relating to our Supply Chain operations. The policy shall be communicated to key suppliers as part of continued supplier relationship management via the Kodiak Hub platform. The expectations set out in this policy are also included in the Supplier Self Audit Questionnaire which is used periodically to assess key suppliers ongoing commitment to quality and best practice in all aspects of their business operations.

5. Reporting

Supplier Performance against this policy will be monitored and may be communicated to GAUK stakeholders in internal Board reports, at the Employee Forum, in newsletters, on the business websites, on social media and in the media (within the bounds of confidentiality as agreed with suppliers)