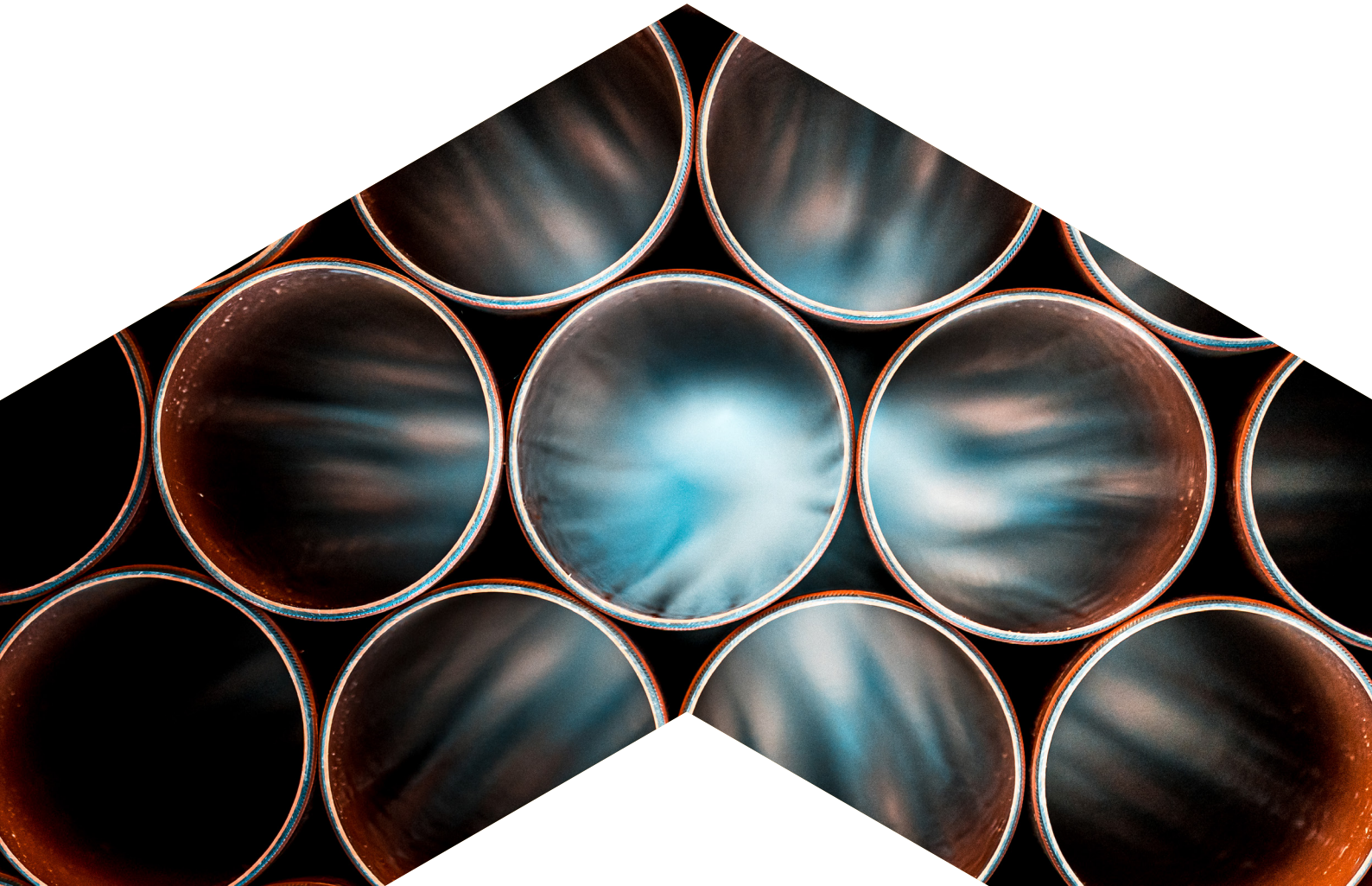




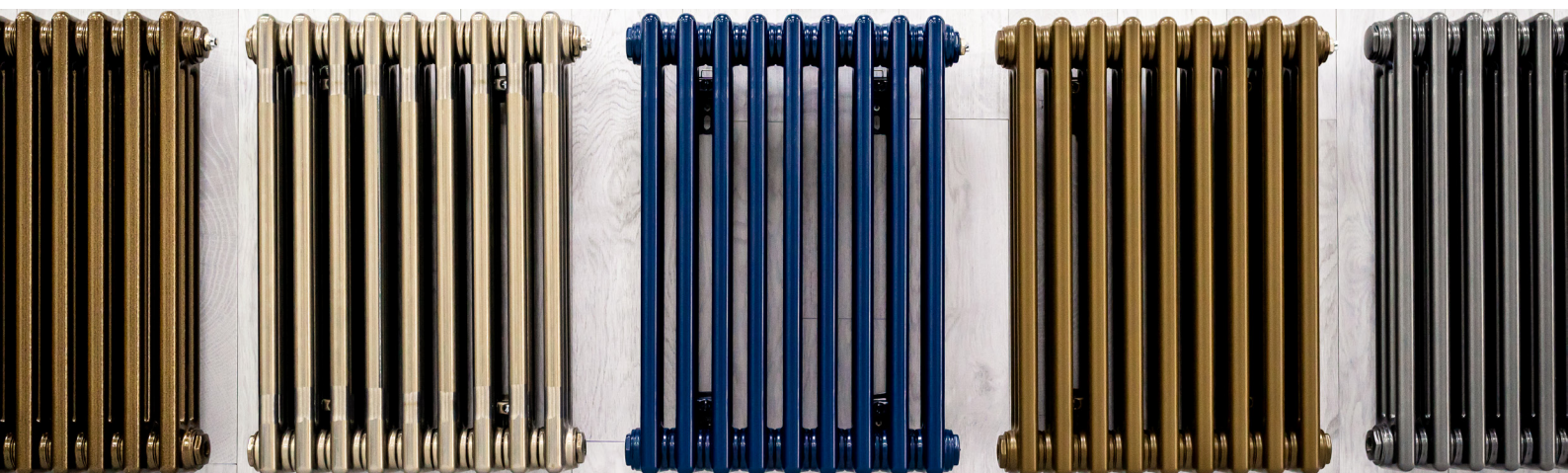
**LORDS**  
GROUP TRADING

# Supplier Code of Conduct



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## Introduction

Lords Group Trading Plc (“the Group” or “LGT”) and its subsidiaries are committed to conducting business with integrity and honesty, treating people with dignity and respect, protecting the environment, and complying with all applicable laws and regulations.

All great companies are prepared to be measured on what they stand for, and we are no exception. This Supplier Code of Conduct (“the Code”) is applicable to all suppliers who provide goods or services to LGT or any of its subsidiaries, subcontractors, affiliates, or agents. LGT’s suppliers are also expected to advocate the principles of the Code in their own supply chain. We want our people, and the people in our supply chain, to work safely, look after one another and be part of a supply chain that continues to grow responsibly.

Suppliers must operate within all applicable laws, rules and regulations and must maintain and implement their own policies and procedures to ensure compliance. This Code outlines the fundamental provisions our suppliers are required to follow to respect people and the environment. The Code should be applied in all jurisdictions in line with national legislation. Where the Code and national legislation differ suppliers must follow whichever provides the greatest protection to people and the environment, without infringing on local law.

LGT strives to achieve beneficial supplier relationships built on mutually common values and expected behaviours. We encourage our suppliers to engage in constructive, honest dialogue with us regarding the Code and in doing business together.

The Code formalises LGT practices and makes clear that, recognising differences in cultures and legal requirements, we expect that wherever our suppliers are located, producing products for us or delivering services for us, that they are produced and/or provided in a manner compatible with the high standards that contribute to the reputation of LGT.

Suppliers are required to comply with the Code and to have and maintain practices like those outlined in the Code. LGT is committed to helping its suppliers comply with these standards. In turn, LGT

requires its suppliers to apply these standards to the suppliers they work with in providing goods and services to the company. LGT strongly encourages suppliers to exceed the requirements of the Code and promote best practices and continuous improvement throughout their operations.

## Foundation of the Supplier Code of Conduct

Complying with the Code is about creating an environment where we can do our best work and be proud of the work we do, the challenges we overcome and the success we achieve, all because we do things fairly, legally and with integrity and can be confident that our suppliers apply the same standards.

## Scope of the Supplier Code of Conduct

### Who the Code applies to?

LGT Supplier Code of Conduct applies to suppliers of goods and services and their employees, in their work with LGT through contractual agreement. The term ‘Supplier’ includes subcontractors, service providers, consultants, and agents. As a Supplier you must ensure that the practices and principles outlined in the Code are followed throughout your own supply chain.

### Third Parties

LGT suppliers must have robust processes and procedures in place to ensure any subcontractors or third parties with whom they engage, comply with the human and labour rights and ethical business practices set out in this Code, along with all applicable local laws.

### Compliance with laws

The Code requires compliance with all applicable laws and the provisions covered within the Code, including when the Code sets a higher standard than, but does not conflict with, legal requirements. Customs or local practices never take precedence over legal requirements. If you find that the Code contradicts applicable legal requirements, please inform the relevant LGT Management personnel.



## Working Together

### Reporting misconduct

LGT believes that having a strong ethical culture will create an environment in which employees and Suppliers feel free to report instances of non-compliance with the Code.

We are committed to investigating reports of suspected or known misconduct against our Supplier Code of Conduct and to taking appropriate action based on our findings. Our Suppliers and their employees are obliged to report to us any suspected or known misconduct that breached the Code. You have a responsibility to speak up when you are in a situation or are aware of a situation that you believe may violate or lead to a violation of the Code. By asking questions and reporting concerns, you are doing the right thing and helping our

company stop or prevent Code violations.

We will always support you for doing the right thing.

All issues are treated seriously. We will follow them up conscientiously, discreetly and without bias. Anything you raise will be treated confidentially and communicated on a need-to-know basis only.

Whether you report anonymously or not, you should provide as many details as possible so the issue can be addressed thoroughly and promptly. In addition, you have a responsibility to cooperate in an investigation.

Suppliers need to ensure that their disciplinary and grievance procedures, as well as any whistleblowing procedures, are clearly communicated to all employees.

### How to make the right decision and report misconduct

If you are faced with a difficult decision about business conduct, you should ask yourself the following questions:

Is the conduct a violation of the Code, company policy or law?

Is the conduct inconsistent with our responsibilities?

Will the conduct appear unethical to stakeholders outside LGT?

Could the conduct harm my reputation or the reputation of LGT?

If you answer 'YES' to any of these questions you should follow the whistleblowing procedure below.

### How to report a concern

Any concerns should be raised with:

Shanker Patel, Group CEO: [Shanker.patel@lordsbm.co.uk](mailto:Shanker.patel@lordsbm.co.uk)

Anne Prince, Group HR Director: [anne.prince@lordsgrouptrading.co.uk](mailto:anne.prince@lordsgrouptrading.co.uk)

### No retaliation

LGT does not retaliate against anyone, for submitting in good faith, a report of suspected or known misconduct against the Code, nor do we tolerate others retaliating.

“Good Faith” means that to the best of a persons’ knowledge and belief, everything reported is true and that everything known is reported. Similarly, you must abide by this rule, and not retaliate or tolerate others’ retaliation against anyone who reports misconduct.

LGT does not tolerate retaliation against anyone who raises concern under the Code or assists with an investigation. Any employee who engages in retaliation will face disciplinary action, which could include termination of employment.

## Auditing

We reserve the right to monitor and audit each supplier's compliance with the Code and local law. You must co-operate by providing relevant information that we request, when required. Similarly, you are required to evaluate your supply chain to ensure compliance with the Code and local law and must conduct audits of your supply chain when requested by LGT.

Any non-compliance by you or within your supply chain must be effectively remedied both in a timely manner and at no additional cost to us or our customers. Breaches of the Code may negatively impact your business relationship with LGT if not disclosed to us in the spirit of collaboration as per the requirements covered in 'Working Together'. Potential consequences may include but are not limited to contract termination. This provision for auditing does not relieve or limit a supplier's obligation or responsibilities.

## Continuous Improvement

We encourage LGT suppliers to communicate to us any actions taken to improve its business practices and to send us suggestions about how LGT can best contribute to the implementation of the principles set out in this Supplier Code of Conduct.

Anyone who believes that a company employee, supplier, or anyone acting on behalf of the company has engaged in an illegal or otherwise improper conduct prohibited by this Code should report the matter to LGT following the whistleblowing procedures outlined in this document.

A supplier's relationship with LGT will not be affected by an honest report of potential misconduct.

## Provisions of the Supplier Code of Conduct

### Health, safety, and wellbeing

We are continuously striving to develop a work environment that promotes the physical and mental health, safety, and wellbeing of workers in our own organisation and workers in our supply chain. We care for our people and the people affected by our business. We aim to lead our industry in health and safety performance, with continuous, measurable improvements towards our goal of an injury-free environment.

- Our vision is zero harm. Our work is never so urgent that we cannot take time to perform it safely and we expect our suppliers to hold this same vision.
- We encourage sound, personal safety, and accident prevention practices with our supply chain and throughout our industry. Suppliers will provide a clean, safe, and healthy working environment to protect the occupational safety of all employees and shall comply with all applicable laws and regulations regarding the provision of safe and healthy working conditions.
- Suppliers must ensure they have the right measures and appropriate health and safety training to prevent accidents and injury at work and all workers must be provided with appropriate personal protective equipment for the work they are undertaking.
- Everyone at LGT is responsible for making this a reality and we look to our suppliers to help us deliver this commitment.
- Every supplier is responsible for making the physical and mental health and safety of workers a priority and should promptly report unsafe or hazardous conditions to LGT. Our suppliers are responsible for ensuring all activities are undertaken safely, with no detriment to the physical or mental well-being of their employees and others that may be affected. Suppliers must implement a policy that requires all incidents and near misses must be reported and recorded.
- We require everyone who works for or with us, including our suppliers and the workers in our supply chain, to understand the health and safety risks of their activities and apply good health and safety management systems, training, and practices in all they do. They should also take the necessary precautions to protect everyone from workplace injuries, occupational disease and work-related causes of mental health problems.
- Suppliers' employees are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage and eating facilities. Where employee accommodation is provided each individual must receive adequate space, ventilation, lockable storage, cooking and washing facilities.

## What does this mean for you?

All our Suppliers must:

- Work together with LGT and other suppliers to ensure a healthy and safe working environment.
- Ensure that all employees and others in the supply chain are adequately trained and provided with proper equipment to safely carry out their work.
- Recognise that all employees have the right and an obligation to stop unsafe work.

## Fair working conditions

Within our workplace and supply chain, we are committed to respecting global human rights and fair working conditions.

- Suppliers must respect the fundamental right of Freedom of Association and Collective Bargaining.
- Working hours, wages and overtime shall be provided in compliance with all applicable laws with the purpose and intention of the relevant laws.
- All workers in our supply chain shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater. While it is understood that overtime may be required, suppliers must carry out operations in ways that limit overtime to a level that ensures humane and productive working conditions.

- Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of workers; nor shall they include sanctions that result in wage deductions, reduction in benefits, or compulsory labour. The use of threats of physical or sexual violence, harassment, and intimidation against a worker, his or her family, or close associates, is strictly prohibited.

## What does this mean for you?

- Ensuring alignment with International Labour Organisation (ILO) Core Conventions and the ILO Declaration on Fundamental Principles and Rights at Work.
- Adherence to local law, the Code and ILO Conventions, whichever provide the greatest protection.
- Ensuring that working conditions, hours, wages, and benefits comply with applicable national and local laws and the International Labour Organisation (ILO) Core Conventions. In particular, overtime shall be voluntary, the total hours in any 7-day period will not exceed 60 hours except where covered by national law and a collective agreement. Employees shall be provided with at least 1 day off in every 7-day period, or 2 days off in every 14-day period.





## No Discrimination or harassment

We treat each other with respect, dignity, and fairness at LGT and expect our suppliers to provide the same principles.

- Our suppliers must provide all workers with equal treatment and employment opportunities. We will not tolerate any form of harassment or discrimination.
- Equal employment opportunities must be provided to all applicants and workers at our suppliers' sites, regardless of race, colour, sex, sexual orientation, gender identity, religion, creed, national or ethnic origin, migrant status, age, disability, citizenship status, veteran status, marital status, family or pregnancy status or any other protected class or characteristic under applicable law.
- LGT suppliers must treat all workers with respect and dignity. No work shall be subject to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse, nor is there to be the threat of any such treatment.

### What does this mean for you?

- Do not tolerate disrespectful behaviour, bullying, discrimination, harassment, or unwanted sexual advances.
- Do not discriminate and make sure to provide equal treatment and opportunities for all workers and job applicants.
- Embrace, encourage, and promote an inclusive culture.

## Forced labour

There must be no involuntary or forced labour, including indentured, bonded, slave or human trafficked labour. All work must be voluntary, and workers should have the freedom to terminate their employment in accordance with established laws, regulations, and rules.

- There shall be no forms of coercion, fraud, deception, abuse of power, or other means to achieve control over another person for the purpose of exploitation.
- Workers must not be required to lodge 'deposits' or identity papers with their employer and must be free to leave their employer after reasonable notice.
- Recruitment fees and the cost of transportation for migrant workers must be covered by the employer, not by the workers.
- Accommodation for migrant workers shall be well ventilated, provide reasonable living space, access to potable water, washing and cooking facilities, and lockable storage for each worker.

### What does this mean for you?

- Employers must ensure that all employees have the legal right to work, and any migrant workers should be in possession of a valid work permit issued by the relevant authority.
- When the subcontracting of recruitment and hiring is necessary, companies shall ensure that the labour providers and recruitment agencies they engage operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places workers at risk of forced labour or trafficking for labour exploitation. All fees and costs associated with the recruitment and employment of the workers shall be borne by the employer.
- Written contracts of employment shall be provided to all workers in a language they understand, clearly indicating their rights and responsibilities with regards to wages, working hours and other working and employment conditions.
- Suppliers must put in place adequate procedures to ensure that they are not directly or indirectly, through their supply chain, involved in any form of involuntary or forced labour.



## Child labour and young workers

Child labour shall not be used.

- The term “Child” refers to any persons under the age of 15, or under the age for completing compulsory education, or under the minimum legal age of employment, whichever is higher.
- LGT commits to developing and participating in policies and programmes which provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child.
- Young people under the age of 18 must not be employed at night or in hazardous conditions.
- LGT encourages the employment of apprentices as long as minimum age requirements and legal minimum wage requirements are met.

### What does this mean for you?

- Do not employ any persons considered to be a child, per the above definition.
- Verify all workers’ ages before they begin work.
- Conduct a risk assessment for all young workers that are under the age of 18 (but permitted to work) to ensure these workers are not employed in hazardous environments, or work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety, or morals.
- In the case of child labour being identified, you must ensure that the wellbeing of the minor is the priority in remediation.

## Environment

We are committed to protecting the environment. LGT takes its responsibility for protecting the environment seriously and is committed to reducing its own environmental impact. Suppliers should be compliant with local environmental laws and regulations, including those relating to waste disposal, pollution, discharges, and emissions.

- LGT suppliers must comply with all local environmental laws applicable to the workplace, the products produced, and the methods of manufacture. Additionally, LGT suppliers must not use materials that are considered harmful to the environment but should encourage the use of processes and materials that support sustainability of the environment throughout their supply chain.
- When handling substances (materials, preparations, and products) that are classified as hazardous to the environment, our suppliers must ensure that such substances are handled, transported, stored, recycled and/or disposed of safely.
- Suppliers to LGT shall carry out operations with care for the environment and at a minimum will comply with all applicable environmental laws and regulations.

### What does this mean for you?

- Ensuring you conduct your operations in an environmentally responsible manner and in accordance with applicable environmental laws.
- Making sure you comply with any standards required by the LGT environmental policy.





## Anti-corruption and Anti-bribery

LGT is committed to conducting business with a high level of integrity and does not tolerate any form of bribery or corruption, and takes seriously the need to ensure that business is carried out in an ethical manner.

- Engaging in bribery and corruption and making facilitation payments can seriously damage our reputation and business relationships. LGT never offers, gives or receives bribes or improper payments, or participates in any kind of corrupt activity, either directly or through any third party. We expect our suppliers to apply the same stringent principles.
- LGT suppliers should not engage in any form of commercial bribery or kick-back scheme. Suppliers should be compliant with all laws, regulations and best practice relating to anti-corruption, including a prohibition on extortion, bribery, facilitation payments or other improper inducements, as well as all local laws dealing with bribery of government officials. Suppliers must take appropriate steps to ensure that their suppliers are also compliant with all laws.

### What does this mean for you?

- You should conduct your business with integrity, likewise, do not tolerate any form of bribery or corruption. Never request, accept, pay, offer, or authorise bribes, either directly or indirectly, under any circumstances. This includes never seeking to influence or bribe an LGT employee, customer, or public official, or any other individual or entity.
- Do not offer or make facilitation payments or permit others to do so on your behalf. Facilitation payments are bribes, no matter how small, paid to public officials to speed up non-discretionary bureaucratic processes and access services to which the payer is lawfully entitled.
- You must ensure all reports, records, and invoices are complete and accurate, and not false or misleading.
- Our suppliers must act against corruption and bribery and ensure that personal relationships do not interfere with business activities.

## Fair competition

LGT is committed to fair competition as it drives efficiency and innovation, which are the basis of a well-functioning market economy. We do not tolerate any violation of anti-trust laws, competition laws or related regulations.

- Suppliers are required to act in a way that mitigates any conflict of interest which may occur when working with LGT. LGT is responsible for dealing fairly with customers, suppliers, competitors and other third parties. This means our employees avoid taking unfair advantage through manipulation, concealment or misrepresentation of key facts, or other unfair practices. Any such conflicts should be reported immediately.
- Competition and anti-trust laws prohibit a variety of business practices that restrict free and fair competition, such as bid rigging, price fixing, cover pricing and other penalties, including debarment. Individuals can face prison.
- We are committed to free and open competition in our markets. We compete fairly and ethically, and support laws that promote and protect competition. The decisions we make about pricing, customers, bids and markets are taken by us alone.
- LGT expects that when its suppliers are preparing proposals, bids or undertaking contract negotiations for LGT and its clients, they are certain that all statements, communications, and representations are accurate and truthful. Equally, LGT suppliers who serve us across national borders will understand and comply with all applicable export laws and regulations.
- Our suppliers will not share with us information they receive from or about our competitors.
- You should always report anti-competitive behaviour if you see or suspect it. Our suppliers should inspire trust by taking responsibility, acting ethically, and encouraging honest and open debate.

### What does this mean for you?

- Ensure you practice fair competition.
- Ensure you do not participate in price rigging by way of price suppression, complementary or cover pricing, price rotation, or other mechanisms that limit fair competition in tender situations.
- Ensure you do not participate in any other form of cartel practices with competitors, such as dividing or allocating markets, customers, or price fixing.

## Confidentiality and information security

Any information related to LGT must be treated with care. Suppliers must comply with confidentiality clauses as detailed within agreed contracts to protect sensitive LGT information. We respect the trade secrets and confidential information of other companies and individuals.

- LGT collects information from the public domain and does not permit the inappropriate collection of others proprietary information.
- You must ensure that you respect the confidentiality of LGT information. You should not share any confidential information unless specifically authorised to do so by a member of LGT management.
- LGT suppliers have a responsibility to keep confidential information safe and make sure it never gets into the wrong hands.
- LGT suppliers must take all due care in handling, discussing, or transmitting sensitive or confidential information that could affect the company, its employees, its companies, the business community, or the general public.
- Disclosure of financial information could influence the actions of shareholders and potential investors and possibly violate security law. It is the suppliers' responsibility to hold the company's confidential information as confidential even after their assignment or contract with LGT has ended.
- To protect others confidential information, suppliers should not disclose to anyone at LGT information related to any other company if the supplier is under contractual or legal obligation not to share that information.

### What does this mean for you?

- Avoid discussions of competitive information with employees of competitors in all circumstances,

including at professional association or industry meetings.

- Be truthful and never misrepresent who you are or where you work to learn about competitors.

## Financial integrity

LGT policies are clear, no employees will engage in any activity that is designed, or can be reasonably construed, to perpetuate fraud or evade taxes. We expect our suppliers to meet these same standards.

- Fraud is a criminal offence in most countries. Whilst its definition varies across these countries, fraud always involves deception and dishonesty. It's fraud when you deliberately try to deceive someone, act dishonestly or abuse your position to gain any kind of material advantage or use or involve anyone else to do so.
- Fraud is usually carried out for profit, or to obtain money, property, or services unjustly. It can involve defrauding the company or a third party.

### What does this mean for you?

- LGT suppliers will never knowingly seek to gain any advantage of any kind by acting fraudulently, deceiving people, or making false claims, or allow anyone else to do so on your or our behalf. This includes:
  - Defrauding or stealing from the company, a customer or any third party.
  - Any kind of misreporting of times or expenses.
  - Tax evasion or deliberately or dishonestly taking action to help someone else to evade tax.
  - Money laundering.
- Always act honestly, fairly, and openly, carefully checking or inspecting things that you are responsible for.



## Personal information

LGT recognises its duty to respect personal information and ensure it is protected and handled responsibly and only used for the purpose for which it is provided.

- LGT suppliers must ensure that all personal information is controlled in accordance with, and their data and information systems comply with, applicable laws and regulations.

### What does this mean for you?

LGT expects its suppliers to manage personal information in accordance with the following Data Protection Principles. They will:

- Process personal information fairly and lawfully.

- Obtain personal information only for specified, explicit and legitimate purposes.
- Ensure personal information is adequate, relevant, and not excessive.
- Ensure personal information is accurate and, where necessary, kept up to date.
- Not keeping personal information for longer than is necessary.
- Process personal information in accordance with the rights of the individual.
- Keep personal information secure.
- Not transfer personal information unless there is adequate protection in place.

## Declaration

### LGT Supplier Code of Conduct

Issued by LGT:



Name: Shanker Patel

Position: Chief Executive Officer

Date: 22.09.2023

We, [Lords Group Trading] agree to abide by the terms and conditions detailed in the LGT Supplier Code of Conduct. We ensure our structure, operations, and supply chain act ethically and comply with this Code, along with all applicable laws and regulations.

Signed by Supplier:

Name:

Position:

Date: