



## **HIGHFIELD PARK – SUPPLIER CODE OF CONDUCT**

Highfield Park is committed to business practices that produce social, environmental and economic benefits for our local community.

For the purposes of this code, “Supplier” means any company, corporation or other entity, or individual that sells, or seeks to sell, goods or services to Highfield Park.

In addition to the expectations set forth in this code, Highfield Park strives to work with suppliers that demonstrate efforts that align with our environmental, social and governance initiatives. Highfield Park requires our suppliers to uphold our values and adhere to ethically, socially and environmentally responsible practices. Our supplier code of conduct defines the standards that must be met by our suppliers, concerning their responsibility towards all individuals, community and the environment.

### **Compliance with Law and Regulations**

Suppliers shall comply with all applicable laws, rules and regulations, including (but not limited to) those relating to labour, health and safety, and the environment, of the place in which they operate or conduct their business.

Suppliers shall notify Highfield Park immediately of any violation of applicable laws, rules and regulations that may affect their ability to supply products or services to us in accordance with the code.

### **Quality and Safety**

Suppliers shall supply products and/or services that are safe, fit for purpose, of merchantable quality and comply with all applicable health and Safety laws, rules and regulations.

### **Third Party Certifications**

Highfield Park encourages the use of third-party certifications to ensure traceability of products and services relating to safety, quality and performance standards within the supply chain.

### **Business Integrity and Ethics**

Suppliers shall deal honestly, fairly and ethically in every aspect of their business, including sourcing, operations and relationships with clients, employees, suppliers and business partners. Suppliers are free to form or join trade unions for the protection of their own interests and fundamental rights. Suppliers must not resort to anti-competitive, deceptive, discriminatory, dishonest, unlawful or unethical business practices. Suppliers should ensure that any professional activity that would create a conflict between personal interests and our business interests is declared. Suppliers must comply with all applicable anti-bribery, anti-lobbying, anti-money laundering and anti-corruption laws, regulations and codes including, but not limited to, compliance with the UK Bribery Act 2010.

### **Labour Standards and Practices**

Suppliers shall comply with all applicable laws, rules and regulations pertaining to working hours, wages, benefits, minimum age (forbidding child labour), safe and respectful working conditions, occupational health and safety, industrial relations, and ethical recruitment. Suppliers must ensure that appropriate training is given to their employees in key labour, employment rights and safety practices including workplace harassment.

### **Harassment and Harsh Treatment**

Suppliers shall ensure that they provide a workplace for employees that is free of all types of harassment (including sexual, as well as verbal harassment). All suppliers should have procedures in place that ensure protection for employees raising concerns, e.g. whistleblowing policy, which comply with all local laws and regulations.

**Environment**

Suppliers shall comply with all applicable environmental codes, laws, rules and regulations in the place where they operate and ensure that they obtain and maintain all necessary environmental permits and registrations to conduct their business. Suppliers shall adopt appropriate environmentally friendly practices to minimise negative environmental impacts of their operations, products and services through measures such as proper waste management, pollution control and recycling, while continually advancing the sustainability of the products and services provided to Highfield Park and their local communities.

Highfield Park expects their suppliers to commit to understanding, measuring and reporting on their energy efficiency and greenhouse gas emissions in order to set targets and work towards Net Zero.

**Diversity and Inclusion**

Suppliers shall be committed to encouraging equality, diversity and inclusion among their workforce and eliminate unlawful discrimination. Suppliers shall have a written and Board owned/ approved policy on Diversity and Inclusion.

**Review and Audit**

Highfield Park will work with suppliers to ensure and evaluate performance of this code. Highfield Park reserves the right, upon provision of reasonable notice to suppliers, to conduct a compliance audit. Upon receipt of a request from Highfield Park, suppliers shall promptly and in good faith provide relevant documentation and evidence to demonstrate compliance with this code. If necessary, suppliers shall facilitate physical inspections by Highfield Park (or its auditors) of its facilities and records, including those of their sub-contractors, to assess compliance with this code