



EDMUNDS DESIGN & CONSTRUCTION LTD

Supply Chain Environmental, Social and Governance Agreement

Introduction

“This Code” means this ESG Code of Conduct for a Supplier document.

“ESG” means Environmental, Social and Governance.

“Supplier” in this Code means any business or other entity that agrees to or does supply any goods, services or facilities to the Edmunds Design & Construction Ltd at any time.

The ESG policy of Edmunds Design & Construction Ltd is to ensure so far as applicable and reasonably practicable that its operations, activities and conduct, and those of its Suppliers, will be carried out with a commitment to:

- (a) protecting and enhancing the environment by minimising negative impact and maximising positive impact on the environment
- (b) ensuring appropriate conduct towards, positive impact on and good relationships with employees, customers/clients, suppliers and the community in which Edmunds Design & Construction Ltd and its Suppliers operate
- (c) conduct their business with integrity and high standards of business ethics, through appropriate structures, systems, processes and procedures.

The ESG Commitment is a fundamental principle of Edmunds Design & Construction Ltd’s business.

Edmunds Design & Construction Ltd’s General ESG Principles

In fulfilling the ESG Commitment, Edmunds Design & Construction Ltd seeks to:

- comply with all applicable local and national laws, rules, regulations and other measures having the force of law that are relevant to any aspects of the ESG Commitment
- where it is practicable and appropriate to do so, establish and meet standards relevant to any aspects of the ESG Commitment which are higher than the standards imposed by law.

Suppliers’ Commitment

This Code sets out the minimum standards that must be met by Edmunds Design & Construction Ltd’s Suppliers [and their suppliers and sub-contractors] in order to assist Edmunds Design & Construction Ltd to maximise its ability to meet the ESG Commitment.

Each Supplier is required to:

- comply with this Code
- adopt and implement policies, standards and processes fully consistent with the Supplier’s commitments set out under the Environmental, Social and Governance headings below
- confirm in writing to Edmunds Design & Construction Ltd on or before accepting the Customer’s order for goods or services, and again thereafter at intervals of no more than 18 months that the Supplier complies and will continue to comply with this Code
- ensure that each such confirmation is correct in all respects



- have systems in place to ensure compliance and to demonstrate that it is compliant
- permit Edmunds Design & Construction Ltd to conduct audits to verify the Supplier's compliance with this Code
- sign and return a copy of this Code to Edmunds Design & Construction Ltd.

Environmental

The Supplier will:

Ensure that its operations, the goods that it manufactures and the components that it incorporates into its goods comply with all applicable environmental protection laws and regulations, and require its goods and services supply chain to do so

Operate management procedures to include environmental factors and carry out environmental audits when required

Continuously improve environmental performance and integrate recognised environmental best practice into business operations

Measure, and act to reduce, the carbon footprint of business activities

Where possible, reduce consumption of resources and improve efficiency of use

Promote a culture of environmental awareness amongst all employees

Provide training for all employees as appropriate to enable them to carry out their job functions in a manner that shows care for the environment

Have in place a suitable environmental management system for identifying and managing environmental risks and hazards and require its goods and services supply chain to do so

Focus on action to conserve resources and energy, to minimise emission to air, water and land and to increase recycling rates

Minimize its negative effect on biodiversity, climate change and water scarcity

Swiftly respond to accidents or incidents that have a potential to threaten the environment

Manage and dispose of all waste in a responsible manner in ways that show concern for the environment

Manage waste generated from business operations according to the principles of reduction, re-use and recycling

Use packaging materials that comply with all applicable environmental laws and regulations and require its goods and services supply chain to do so

Recycle all packaging materials and ensure that as many waste materials as possible are recycled, and require its goods and services supply chain to do so

Ensure that it safely handles and transports all hazardous or toxic materials and products



Social

The Supplier will:

Comply with and require its goods and services supply chain to comply with, all applicable anti-slavery and human trafficking laws, statutes, regulations and codes, including the Modern Slavery Act 2015 and other laws etc. prohibiting forced or compulsory labour, child labour, bonded labour, prison labour

Not infringe, and will prohibit its goods and services supply chain from infringing, any internationally recognized human rights, including those recognised in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work

Provide and maintain, and require its goods and services supply chain to provide and maintain a working environment free from all forms of discrimination, harassment and bullying, (e.g. union membership or political affiliation, gender, gender identity or expression, gender reassignment, sexual preference, race, colour, caste, creed, religion, nationality or national origin, ethnicity or ethnic origin, ancestry, age, marital or pregnancy status, civil partnership or disability)

Not to, and require its goods and services supply chain not to discriminate in selection, engagement, placement, training, promotion, transfer or compensation or other treatment or dealing with any employees on the basis of union membership or political affiliation, gender, gender identity or expression, gender reassignment, sexual preference, race, colour, caste, creed, religion, nationality or national origin, ethnicity or ethnic origin, ancestry, age, marital or pregnancy status, civil partnership or disability or any other characteristic

Permit, and require its goods and services supply chain to permit, employees' freedom of association, union membership and collective bargaining, in accordance with applicable laws, in order to protect or represent their interests

Promote, and require its goods and services supply chain to promote diversity and inclusion amongst its and their workforce

Comply with, and require its goods and services supply chain to comply with, workplace health and safety laws and standards, and will take steps to mitigate risks to health and safety in the workplace, prevent workplace hazards and work-related accidents and injuries

Provide, and require its goods and services supply chain to provide, fair and competitive remuneration (including overtime premiums), benefits, working hours, attendance, leave and sick leave policies, ensuring as a minimum that remuneration is sufficient to cover basic living requirements and that working hours do not exceed the maximum permitted by applicable laws and industry standards

Encourage, and request that its goods and services supply chain encourage, employees to participate in appropriate further education and training (including any education or training that the Supplier or its goods and services supply chain is able to provide in-house) which supports their work-related development allowing paid time-off to complete where circumstances permit

Support, and encourage its goods and services supply chain to support, the local community by employing local people where and to the extent appropriate and reasonable to do so.



Governance

The Supplier will:

Ensure that it, and require its goods and services supply chain to ensure that it, complies with all applicable local and national laws and regulations, relevant standards and codes of practice relating both generally and in particular to transparency and corporate governance

Ensure that it has clear and effective governance for ESG

Promote strong oversight and transparency at all levels of its organization

Establish and maintain high standards of business ethics conduct, and promote a culture of integrity, honesty, ethical and responsible conduct in its business activities and behaviours

Comply with all applicable laws relating to bribery and corruption (including the Bribery Act 2010) prohibit any bribery or corruption of, or by, any of its officers or employees and require its goods and services supply chain similarly to comply with such laws and to prohibit their officers and employees from engaging in any bribery or corruption

Prohibit any money laundering by any of its officers or employees, and require its goods and services supply chain similarly to prohibit their officers and employees

Maintain and implement policies covering anti-bribery and corruption, code/s of conduct, conflicts of interest, privacy and human resources, as part of the governance structure of the Supplier and require its goods and services supply chain to do so

Avoid investment in or any other connection with, and prohibit its goods and services supply chain from investing in or having any other connection with, industries with a negative social impact, for example, gambling, tobacco, pornography or weapons manufacture/sales

Comply with all applicable data protection laws and requirements (including the UK GDPR) when processing any personal data on behalf of Edmunds Design & Construction Ltd, and maintain appropriate privacy and data security measures to protect the integrity and confidentiality of information held on its systems (including information supplied by Edmunds Design & Construction Ltd and information of employees goods and services supply chain, and ensure that there is no unauthorised access to any such information by third parties including its goods and services supply chain.

Viewing and updating this Code

Edmunds Design & Construction Ltd will publish this Code (as amended from time to time) on its public website so that it is freely available to all Suppliers and others to view at any time.

Edmunds Design & Construction Ltd will periodically review and update this Code as necessary.

On each occasion that this Code is updated, Edmunds Design & Construction Ltd will notify Suppliers by email, that it has been updated and will provide them with a copy of the updated Code, and remind Suppliers that they can view the up to date Code on Edmunds Design & Construction Ltd's public website.