



Policy:	Supplier Code of Conduct	Reference:	SCCSES0084
		Review Date:	01/2023

SES Engineering (Newark) Ltd is committed to acting as a responsible corporate citizen. We believe in the highest standards for ethical, social and environmental behaviours and we expect the same from our suppliers and their supply chain.

Our suppliers shall comply with the SES Engineering (Newark) Ltd Supplier Code of Conduct, all applicable laws and regulations, contractual obligations and the terms of this supplier code of conduct.

Compliance with Laws.

Suppliers must ensure their production, products and services are in compliance with applicable laws and regulations, both local and otherwise. Suppliers must also comply with the local laws, regulations and procedures that apply to their manufacturing plants/supply chain.

Human Rights.

Suppliers must respect Human Rights and privacy of each individual. Suppliers are expected to treat people with respect and dignity, promote diversity and equal opportunities for everyone, and foster an inclusive, committed and ethical culture.

Child Labour.

Suppliers shall not use child labour or conduct business with business partners using child labour. The term 'child' means any person under the statutory minimum age applicable to employees where the work is performed, provided and legal age is consistent with the minimum working ages defined by the International Labour Organisation.

Human Trafficking.

Suppliers shall refrain from the recruitment, transportation, transfer, harboring or receipt of persons, by means of force, fraud or coercion for the purpose of exploitation. They shall also refrain from using or providing labour or services procured illegally, and notably through migrant smuggling. By agreeing to supply SES Engineering (Newark) Ltd, you also agree to adhere to the Anti-Slavery and Hum Trafficking policy ASHTSES0078.

Employment Practices.

Suppliers shall prevent harassment and ensure that their employees can work in an environment free of physical, psychological and other forms of abuse.

Suppliers must ensure that they respect the rights of their employees and comply with all applicable laws and regulations in the country or countries in which they operate. This includes all rights and minimum standards relating to wages, benefits and working conditions.

Suppliers are expected to respect the freedom of association or workers and their rights to communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or retaliation.

Safety

Nothing is more important than the health & safety of everyone who works for or on behalf of SES Engineering (Newark) Ltd.

The company is fully committed to meeting its responsibilities under the **Health & Safety at Work etc Act 1974**, the **Management of Health & Safety at Work Regulations 1999**, and associated protective legislation, both as an employer and as a company. It is the responsibility of SES Engineering (Newark) Ltd to ensure the health, safety and welfare of its employees and it will, so far as is reasonably practicable, establish procedures and systems necessary to implement this commitment and to comply with its statutory obligations on health and safety which will be under constant review. To liaise with the Health & Safety Executive wherever necessary; and to keep abreast



of new legislation, EU Directives, Regulations and British Standards, in order to ensure on-going compliance with the law.

When working with us – We expect all of our customers, suppliers and subcontractors to adhere to these exact principles as a minimum and to report all unsafe events and conditions and to stop work if anything changes.

Environmental Health & Safety.

Suppliers shall respect their environment and work to minimise environmental impacts linked to their activities. They shall endeavour to use energy as efficiently as possible and promote the use of renewable energy.

Suppliers shall ensure the safety, health & welfare of their employees, visitors and others who are involved in their business activities.

Furthermore, they shall comply with all applicable laws and regulations and use their best efforts to respect health & safety procedures.

Corruption.

Fair Competition.

We believe in open and fair competition and only seek competitive advantage through fair and lawful means. We want to work in marketplaces that are fair, open and honest, and want our competitors, customers and suppliers to know this is how we will always behave. We comply with competition and anti-trust laws wherever we do business, and we expect you to do the same. We want to work with strong suppliers and partners who succeed on the merits of their service offering and not those resorting to unfair tactics to gain improper advantage.

When working with us – Never share with us information you receive from or about our competitors or their bids. The bids you make to our competitors. Always – Report anti-competitive behaviour if you see it or suspect it. Return immediately any confidential information you should not have received.

Compliance with Anti-Corruption Laws.

Suppliers shall neither tolerate nor engage in any form of corruption or influence peddling and shall not grant, offer or promise, or ask for, directly or indirectly, anything of value to or from a public official or private sector employee to influence actions or obtain an improper advantage. This includes any facilitation payment.

Suppliers are expected to conduct reasonable due diligence to prevent and detect corruption and influence peddling in all business arrangements, including partnerships, joint ventures, and the use of intermediaries such as agents or consultants.

Gift Invitations.

Exchanges of gifts or invitations may not be used to gain an unfair competitive advantage. In any business relationship, suppliers must ensure that the offering or receipt of any gift, invitation, entertainment or business courtesy is permitted by law and regulation, for a legitimate purpose, reasonable, and not intended to influence, and that these exchanges do not violate the rules and standards of the recipients organisation and are consistent with reasonable market place customs and practices.

Competition.

Suppliers shall comply with all applicable antitrust, competition and trade practices laws and regulations. In doing so, they shall refrain from practices such as improper exchanges of information and data, pricing arrangements with competitors, bid-rigging, improper customer or territory allocation or other practices which unlawfully restrict competition.

Enforcement and Auditing.

The Supplier, subcontractor or customer shall continuously monitor and document its compliance with this Code and applicable laws and regulations. SES Engineering (Newark) Ltd may give more specific instructions regarding compliance with this Code from time to time, which all shall follow. Should anyone identify any area of its operations (including the operations of its affiliates and suppliers) that do not conform to this Code, then it shall report such



non-compliance to SES Engineering (Newark) Ltd and immediately implement necessary improvements to achieve compliance with this Code.

At SES Engineering (Newark) Ltd request, you the supplier, subcontractor or customer shall provide the information and documents which are necessary for us to verify that you are in compliance with this Code. SES Engineering (Newark) Ltd shall have the right to audit your compliance with this Code and applicable laws and regulations itself with or without a support of a third- party auditor. If the results of such audit show, or it becomes otherwise evident that you are not in compliance with this Code, take necessary corrective action in a timely manner as directed by SES Engineering (Newark) Ltd. If you fail to comply with this Code, SES Engineering (Newark) Ltd may take actions against you, including but not limited to suspending orders or terminating any agreement in case of material breach of the Code.