

Supplier Code of Conduct

December 2025



SCoC 12.11.2025

INTRODUCTION

The Hadley Group is committed to operating in a manner consistent with environmental and social best practices and in line with internationally proclaimed human rights principles, including the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

This includes the way we work with our suppliers. The Hadley Group respects and supports human and labour rights throughout its value chain, including in its own operations, those of its suppliers, agents, distributors, and other business partners. The Hadley Group expects its suppliers to have a positive impact on the societies they operate in.

SUPPLIER CODE OF CONDUCT

The Hadley Group's operations are guided by the Hadley Code of Conduct. This Supplier Code of Conduct sets out the details of The Hadley Group's expectations from its suppliers.

To support this work, The Hadley Group monitors relevant suppliers using international media, sanctions lists, watch lists, as well as regular audits. Adverse findings are considered for appropriate action, which can include suspension of deliveries and cancellations of contracts.



ENVIRONMENTAL CONDUCT

Environment and climate change

Suppliers are encouraged to have a systematic approach to protecting the environment. The Supplier shall:

- be committed to protect the environment in accordance with applicable laws and regulations
- continually look for ways to minimize waste and emissions from their operations, products and services, including:
 - using raw materials and energy resources efficiently (including water);
 - preventing deforestation.

Suppliers are encouraged to manage the carbon footprint of its own operations, suppliers, and products.

The Hadley Group expects its suppliers to make continuous improvements in environmental protection, and to develop a CO₂ emission reduction plan if requested.

The Hadley Group may require certain regular reports, including reporting CO₂ data, from the Supplier. This is set out in more detail in the “Monitoring and follow-up” section overleaf.

Health and safety

Suppliers will provide a safe and healthy working environment and take all reasonable steps to prevent health and safety risks, incidents, and injuries, in a manner that is appropriate to their business and risk profile.

The Supplier shall be familiar with and comply with all relevant health and safety regulations and instructions, particularly when performing high-risk work.

The Supplier shall provide relevant health and safety information and instructions, training, personal protective equipment, and tools to its employees.

The Supplier shall ensure that its employees observe all the Hadley Group's and its customers' instructions on safety and security, including, without limitation, all applicable legal and regulatory requirements. When working at Hadley's premises, Supplier's employees and subcontractors must follow Hadley's health, safety, and security requirements.

SOCIAL CONDUCT





SOCIAL CONDUCT (CONTINUED)

Wages and working hours

Suppliers will adhere to all applicable laws, the relevant ILO conventions, and industry standards concerning working hours, wages, benefits, and overtime. This includes maintaining accurate records of hours worked. Supplier will pay wages and benefits that meet or exceed applicable wage and compensation laws and ensure that mandatory benefits are paid to its employees, including paid leave.

Non-discrimination

Suppliers will treat their employees with dignity, fairness, and respect. The Supplier shall not discriminate against its employees based on their gender, age, religion, marital status, sexual orientation, political opinion, national or ethnic origin, social background, disabilities, or similar characteristics. The Supplier shall not tolerate any form of physical, sexual, or verbal harassment, actual or threatened violence, bullying, discrimination, humiliation, or intimidation.

Child and forced labour

Suppliers will not use, or support any use of, child or forced labour, slavery or human trafficking; unlawful employment terms; nor allow unlawful working conditions in its operations. All Supplier employees must be free to leave their employment after a reasonable notice period, as required by local legislation or contract.

Suppliers will not require employees to deposit money or identity papers with their employer

SOCIAL CONDUCT (CONTINUED)

GOVERNANCE

Responsible business practices

Suppliers must be committed to internationally recognised good governance, the highest level of integrity and ethical business conduct, and internationally proclaimed human rights principles including the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact, and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, wherever it operates.

Suppliers will not directly or indirectly facilitate money laundering or the financing of terrorism. Compliance with laws and regulations. The Supplier shall be aware of and comply with all applicable laws and regulations in the countries they operate. This includes adhering to regulatory best practices.

Fair competition

Supplier will compete fairly and comply with the applicable competition laws and regulations in the countries where they operate.

For example, the Supplier shall not enter into any agreement with its competitors to fix prices or limit the availability of products or participate in market or customer allocation, market sharing or bid rigging with competitors.

Trade sanctions and export control

Suppliers will comply with all applicable export control and customs regulations and not purchase materials, components, products, or services from suppliers that are subject to trade or economic sanctions imposed by the United Kingdom, European Union, the United States, or by any local authorities.

GOVERNANCE (CONTINUED)



GOVERNANCE (CONTINUED)

Company assets and data privacy

The Supplier must respect the intellectual property rights of others and safeguard the Hadley Group's intellectual property and data, including personal data, in accordance with all applicable laws and the terms of any contract with the Hadley Group, and shall ensure that the level of its information security is adequate to keep all such information confidential and secure.

Supplier must implement sufficient technical, operational and organisational cybersecurity risk management measures that consider the nature, scope and context of its services to The Hadley Group, and the Supplier must inform The Hadley Group immediately in case of any cybersecurity attacks or incidents that may have an impact on such services.

The Hadley Group may further require the Supplier to comply with and report to The Hadley Group regarding certain cybersecurity requirements, including based on applicable law, even if such law would not otherwise apply to the Supplier.



SOURCING CONFLICT MINERALS

Suppliers must be committed to sourcing conflict minerals (tin, tantalum, tungsten and gold) supplied to The Hadley Group with due respect for human rights, the need to avoid contributing to conflict, and the desire to support development through their supply chain practices.

Such minerals originating from conflict-affected and high-risk areas may be sourced only in accordance with existing international standards and applicable laws and regulations, and the Supplier must not contribute to human rights abuses, corruption, the financing of armed groups, or similar negative actions.

Supplier must implement systems and processes to ensure it can identify, manage and report on related risks in its supply chain and in particular stem the trade in tin, tantalum, tungsten and gold as required by the EU Conflict Minerals Regulation.



ANTI-CORRUPTION

The Hadley Group has zero tolerance for bribery and corruption and expects the same from its suppliers. The Supplier must never request, accept, pay, or offer bribes or facilitation payments, whether directly or indirectly through a third party, to influence a business decision or to otherwise obtain a business advantage.

This applies to businesses both in the public and private sectors. All gifts, entertainment, and hospitality must have a legitimate business purpose and they must be acceptable under local laws and business practices. Giving or receiving cash gifts is unacceptable.

The Hadley Group expects suppliers to establish systems and processes to prevent corruption, for example, by setting up an anti-corruption policy, providing relevant training to their employees and not engaging in business with third parties that do not share these principles

The Supplier shall avoid potential conflicts of interest involving its work with The Hadley Group.

The Supplier shall disclose to The Hadley Group any conflict of interest or situations giving the appearance of a conflict of interest, for example if a Hadley employee or his/her immediate family member:

- holds a material financial or other interest in the Supplier;
- holds a managerial position at the Supplier; or
- works for the Supplier and such employment creates a conflict of interest or appearance thereof..

CONFLICT OF INTEREST



MONITORING & FOLLOW UP

The Hadley Group encourages suppliers to implement and maintain management systems and standards and to appoint responsible company representatives who shall ensure compliance with all applicable laws and regulations, the Supplier's contract with The Hadley Group and this Supplier Code of Conduct.

The Hadley Group expects the Supplier's cooperation in verifying compliance, e.g. in completing self-assessments and reports and granting The Hadley Group (or a third party selected by The Hadley Group) access to relevant premises and information to conduct on-site audits, including interviewing relevant supplier personnel and access to accurate and complete documentation and records.

MONITORING & FOLLOW UP (CONTINUED)

Where relevant, e.g., to comply with The Hadley Group's legal obligations, The Hadley Group may require regular reports from the Supplier on certain topics, such as the Supplier's environmental impacts, certain chemicals and hazardous substances, or origins of certain raw materials (such as steel, aluminum and copper) or conflict minerals. The Hadley Group will inform the Supplier of such requirements in advance.

The Supplier must remedy any non-conformity identified without delay. Failure to comply with this Code may have negative consequences. For example, The Hadley Group may suspend or terminate its contract with the Supplier.

In the event of potential misconduct, The Hadley Group encourages our suppliers to report the event to their Hadley contact. Suppliers must also provide access to a protected mechanism for their employees to report possible violations of the principles of this Code of Conduct.

SUB - SUPPLIERS

Supplier must ensure that its own suppliers adhere to this Supplier Code of Conduct (or comparable requirements). The Supplier shall evaluate and monitor its supply chain, and upon request collect and send relevant information to The Hadley Group regarding the supply chain's compliance with this Supplier Code of Conduct.

The Supplier must inform The Hadley Group of any violation of this Supplier Code of Conduct that comes to light during audits and assessments of its sub-suppliers.

The Hadley Group expects the Supplier's full co-operation should The Hadley Group wish to conduct on-site audits at the Supplier's sub-suppliers.

The Supplier shall comply with the principles of non-discrimination with regard to supplier selection and treatment.

Get in touch



+44 (0) 121 555 1300



Downing Street
Smethwick
West Midlands,
B69 2PA



ask@hadleygroup.com

