

Supplier Code of Conduct



Introduction

Sureserve is committed to operating with honesty, integrity and respect, and to upholding the rights and wellbeing of everyone connected to our business. Our suppliers play a critical role in helping us deliver safe, high-quality services to the communities we serve. We therefore expect every supplier to demonstrate strong ethical conduct, responsible business practices and a genuine commitment to social and environmental sustainability. This Supplier Code of Conduct ("Supplier Code") sets out the core values and behaviour for all members of Sureserve's supply chain.

All suppliers, regardless of size, sector or geography, are expected to 'Live the Values' of the Group by complying with the spirit of this Code of Conduct when conducting their business. The Group conducts its business in accordance with its core values:

- **Safety** - Protecting the health, safety and wellbeing of everyone involved in our work.
- **Excellence** - Maintaining high standards, delivering quality, and continually striving to improve.
- **Respect** - Treating people fairly, promoting equality, and fostering inclusive and supportive workplaces.
- **Integrity** - Being honest, transparent and accountable in all business dealings.
- **Expertise** - Applying professional competence and providing reliable, high-quality services.
- **Sustainability** - Reducing environmental impacts and contributing positively to the communities where we operate.

Sureserve seeks to work with suppliers who share these principles and who are committed to responsible economic, social and environmental performance. These standards form part of our supplier selection, onboarding and ongoing evaluation processes.

Scope

This Supplier Code applies to all suppliers and partners who supply products or services related to contracts or purchase orders with Sureserve Group Limited (Company number 09411297) and all its subsidiaries incorporating:

- **Compliance:** Compliance Holdings Ltd, Sureserve Compliance Central Ltd, Sureserve Compliance Fire Ltd, Compliance North Ltd, Sureserve Compliance Northwest Ltd, Sureserve Compliance South Ltd, Sureserve Compliance Water Ltd, Swale Heating Ltd.
- **Energy Services:** Sureserve Energy Holdings Ltd, Sureserve Energy Services Public Buildings Ltd, Sureserve Energy Services Meters Ltd, Sureserve Energy Services North Ltd, Sureserve Energy Services UK Ltd, Hillside-Infinitas Ltd, Sureserve Energy Services South West, Sureserve Energy Services Wales Ltd
- **Electrical:** Sureserve Compliance Electrical Holdings Ltd, Sureserve Compliance Electrical Ltd, R. Dunham (UK) Ltd, Sureserve Compliance Electrical North Ltd.
- **International:** Bonarius Vastgoed B.V.

This Supplier Code of Conduct applies to all suppliers of works, goods and services to the Group including their staff, and supply chains. The Supplier Code of Conduct will be incorporated into agreements entered into between suppliers and the Group and supplements provisions that are included in its contract terms and conditions. If there is any conflict between this Supplier Code of Conduct and the contract, the terms and conditions of contract shall prevail.

This Supplier Code of Conduct is a Group policy and details its working practices and associated actions. Suppliers must be able to demonstrate compliance with the Supplier Code of Conduct at the request and satisfaction of the Group. When the Group becomes aware that a supplier is not in compliance with our Supplier Code of Conduct, the actions, or inaction, of the supplier will be reviewed and appropriate corrective measures will be implemented.

The Group may modify this Code of Conduct from time to time. Any amendment will be published on the Group's website.

Laws and regulations

Why does this matter?

Sureserve is committed to operating lawfully, ethically and responsibly. Compliance with laws and regulations is essential to protecting people, maintaining trust with our clients and partners, and operating safely and sustainably. We expect our suppliers to uphold the same high standards of legal compliance and integrity across all activities.



What does this mean for you?

Suppliers must comply with all applicable laws, rules and regulations in any country in which they operate when providing works, goods and/or services to the Sureserve Group. This includes, but is not limited to, legislation relating to:

- Anti-bribery, corruption and fraud (including the Bribery Act 2010 and Criminal Finances Act 2017)
- Health, safety and welfare (including the Health and Safety at Work Act 1974)
- Data protection and information security (including applicable Data Protection Laws)
- Employment rights and working conditions
- Modern slavery and human rights (including the Modern Slavery Act 2015)
- Environmental protection
- Product safety and quality (including the Sale of Goods Act 1979 where applicable)

Suppliers are responsible for maintaining appropriate systems, controls and training to ensure ongoing compliance with relevant legal requirements and for promptly addressing any breaches or suspected breaches of law.

Fraud, Bribery and Corruption

Why does this matter?

Sureserve has a zero-tolerance approach to fraud, bribery and corruption. We conduct all business professionally, fairly and with integrity, and we expect our suppliers to uphold the same standards. This includes and behaviour that compromises ethical conduct damages trust, exposes people to legal risks, and undermines our ability to operate responsibly.



What does this mean for you?

The Group has a strict policy against bribery and corruption:

- The supplier must have processes and policies in place to prevent fraud and corrupt business practices, in compliance with the Bribery Act 2010, the Criminal Finance act 2017, other applicable anti-corruption laws and the Group's policy.
- The suppliers must comply with the Group's Policy on gifts and hospitality.
- The Supplier shall and shall procure that its Associates will not take any step either alone or with any person to commit, solicit or facilitate any Corporate Failure to Prevent Offence or Tax Evasion Offence withing the meaning of the Criminal Finance Act 2017 in connection with the supply of goods or services.

Health and Safety

Why does this matter?

Everyone should be able to work or use our services safely. Strong health and safety practices safeguard people, ensure legal compliance, and support reliable service delivery. We therefore expect our suppliers to actively promote safe working practices, take responsibility for managing risks and maintaining and promoting safe working environments.



What does this mean for you?

The supplier shall provide a safe, healthy, and sanitary working environment and comply with UK health and safety laws and any other relevant laws when working on any Group site and wherever it operates. This includes, but is not limited to, implementing general and relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries.

Suppliers shall observe all Policies and Procedures and other relevant regulations, codes of practice, guidance notes and other requirements of any relevant government or governmental agency relating to health and safety and environmental protection including as to the provision and use of PPE by Supplier Personnel and, to the extent that such regulations are advisory the minimum compliance to be achieved by the Contract or should be in accordance with Good Industry Practice and Industry Standards and observe all health and safety rules and regulations and other security requirements that apply at any Sureserve Site.

Human Rights and Labour Practices

Why does this matter?

Sureserve expects all suppliers to respect and protect the fundamental rights and dignity of every worker within their own operations and throughout their supply chains. This includes a commitment to preventing modern slavery, ensuring fair pay and working conditions, and fostering workplaces free from discrimination, harassment and abuse.



What does this mean for you?

Suppliers shall ensure a reasonable and safe working environment for their staff, at a minimum, those set out in the Human Rights Act 1998 and comply with the following:

- All applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force including the Modern Slavery Act 2015 in any part of its supply chain. The Group has a zero-tolerance approach to slavery of any kind and is dedicated to ensuring the Group is a slavery-free. The Group Policy is available on its web site.
- Suppliers shall implement reasonable due diligence procedures and annual reviews for its own suppliers, subcontractors and other participants in its supply chains, to ensure that there is no Modern Slavery or compulsory labour in its supply chain.
- Ensure that their working hours, wages and benefits follow all applicable laws.
- The Group encourages suppliers to become living wage employers.
- The Group is an equal opportunities employer and is committed to supporting Equality, Diversity and Inclusion (EDI) for all staff, wherever they are in the world. Creating an EDI rich culture is a priority for the Group.

Data protection and information security

Why does this matter?

Sureserve relies on secure systems and data to deliver services effectively. Weak data protection or cybersecurity practices in the supply chain can lead to data breaches, operational disruption and regulatory risk. Protecting confidential and personal information is essential to maintaining trust and complying with legal obligations, and we expect our suppliers to meet the same standards.



What does this mean for you?

The supplier shall comply with all data protection laws and requirements (including the UK GDPR) when processing any personal data on the Group's behalf. The Supplier shall have in place appropriate measures to:

- Protect the integrity and confidentiality of information (including information belonging to or supplied by the Group) held on its systems (which include physical and online or electronic systems)
- Ensure that there is no unauthorised access of the information by third parties.

Environmental management

Why does this matter?

Reducing our environmental footprint is fundamental to protecting communities, supporting the decarbonisation and meeting our regulatory and social responsibilities. We expect our suppliers to work with us to minimise environmental impacts and promote responsible, sustainable practices.



What does this mean for you?

Suppliers shall comply with all applicable environmental laws and regulations in the countries in which they operate when providing goods or services to the Sureserve Group.

Suppliers are expected to manage their environmental impacts responsibly, in a manner proportionate to the size and nature of their business. This includes taking reasonable steps to identify, control and, where practicable, reduce environmental risks and impacts associated with their activities, in line with the principles of recognised environmental and energy management standards such as ISO 14001 and ISO 50001.

Where non-compliance or environmental risks are identified, suppliers are expected to take timely and appropriate corrective action and to work collaboratively with Sureserve to address issues and improve performance over time.

Suppliers are encouraged to support wider sustainability objectives, including responsible resource use, energy efficiency and emissions reduction, and to conduct their business in a manner consistent with the Ten Principles of the UN Global Compact, as well as the ambition to support a transition to net zero emissions by 2050, where appropriate to their operations.

Reporting Concerns

If you are ever asked to be involved in anything which is in potential breach of this Code, or is otherwise unethical or illegal, then we encourage you to raise your concerns with your normal Sureserve contact. The same applies if you or your colleagues are treated unfairly while working for Sureserve.



You can also contact our Confidential Reporting Hotline:

ssg.whistleblower@sureserve.co.uk.

Such concerns can be reported anonymously - however, it is helpful if you are willing to provide your name and how you can be contacted as this may assist in the investigation of the issue raised. We may use the Confidential Reporting Hotline system to raise questions with you to clarify any issues, or to allow you to review updates on the outcome of the investigation.

Audits and Demonstration of Compliance

Sureserve requires the right as often as reasonably necessary during a supplier agreement and for a period of 12 months following its termination, conduct an audit at its cost, of the operations and facilities, quality, environmental, corporate social responsibility and health and safety procedures and systems of the Supplier, its sub-contractors and other CFA Associates or Associated Persons to:



- a) verify the accuracy of charges levied by the Supplier.
- b) review the integrity, confidentiality and security of any Confidential Information or Personal Data held by the Supplier.
- c) ensure that the Supplier or its sub-contractors, other CFA Associates or Associated Persons meet the standards that Sureserve expects of its Suppliers and their supply chain for the purpose of Sureserve's own corporate governance and risk management policies and procedures; and
- d) review the Supplier's compliance with the Applicable Laws.

Suppliers must undertake to immediately notify Sureserve (so far as permitted by law) as soon as it becomes aware of any allegation, investigation, evidence or report relating to a breach or possible breach of any of the requirements in its Policies and Procedures relating to Anti-Corruption, Anti Facilitation of Tax Evasion, Modern Slavery or Data Protection.

Within one month of a contract commencement date and annually on the anniversary of the commencement date, each supplier is expected to certify to Sureserve, in writing, compliance with this provision and to provide such supporting evidence of compliance as Sureserve may reasonably request.



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