

## **Westcoast Group Supplier Code of Conduct**

Westcoast Group are committed to ensuring everything we do is ethical and lawful, and that we work in a socially and environmentally sustainable way. It is important to us that our suppliers feel the same way.

All suppliers must comply with all national and international laws, rules and regulations, which affect both it's business and our business. This Code captures the universal principles and standards that we expect all of our suppliers to uphold, establishing a culture of integrity wherever its business is situated.

Our standards derive from the UN Global Compact which seek to achieve supply chain sustainability through: 'the management of environmental, social and economic impacts, and the encouragement of good governance practices, throughout the lifecycles of goods and services'.

### **Human Rights**

Our suppliers should support and respect the protection of internationally proclaimed human rights. These include the right to life, liberty and security; equal rights of men and women; the right to protection under the law and against discrimination, slavery, servitude, torture, or inhumane or degrading treatment; and freedom of speech, thought, conscience and religion. All workers must be treated with dignity and respect. We expect all suppliers to ensure that they are not complicit in human rights abuses.

### **Anti-Corruption**

Our suppliers must avoid corruption in all its forms. Our suppliers must never offer, give or receive bribes or make or accept improper payments to obtain new business, retain existing business, or secure any improper advantage and never use or permit others to do so. This includes any type of facilitation payment, large or small, even where such payments are perceived as a common part of local business practice or acceptable under local law. Our suppliers must not participate in or assist any form of tax evasion.

Our suppliers must comply with all applicable anti-bribery and corruption laws - if they are to a lesser standard than the Bribery Act 2010, we also expect adherence to that Act. Suppliers must have in place and implement anti-corruption and bribery procedures to prevent employees or any persons associated with its business from committing offences of bribery or corruption.

### **Labour**

Our suppliers must not make any use of forced, bonded or compulsory labour.

Westcoast does not support the use of child labour in any circumstance. Our suppliers must not employ any child under the age of 16. Even if national laws or regulations allow children between the ages of 13-15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the environment would be harmful to their development of their health.

Our suppliers must respect the rights of employees to freely and voluntarily establish and join groups for the promotion and defense of occupational interests, and must engage in good faith with such groups, or designated representatives in consideration and agreement of employment matters.

Suppliers must not discriminate in hiring and employing workers on the basis of race, caste, birth, social or ethnic origin, religion, nationality, age, gender, gender identity or expression, material status, sexual origination, disability, maternity, union membership or political affiliation.

Suppliers must train their employees to be sensitive to ethical considerations and to consider the effect of their actions and behavior on their own business, its reputation and business and public relationships. Suppliers are expected to take particular account of the potential consequences of their employees' actions and behavior regarding Westcoast, our customers' respective businesses, responsibilities and reputations.

Suppliers must comply with the respective national laws and regulations regarding working hours, wages and benefits. Employees should give their informed, freely given consent to any deductions (which must be lawful).

Suppliers are expected to implement high standards of occupational health and safety. Suppliers must provide their employees with a safe and healthy workplace in order to prevent accidents, injuries and work-related illnesses. They should also make sure a senior management representative is responsible for health and safety.

### **Environment**

Our suppliers must comply with all applicable environmental laws, regulations and standards and will implement an effective system to identify and eliminate potential hazards to the environment.

Suppliers should be prepared for any disruption to their business (such as natural disasters, terrorism, software viruses, illness, pandemics and infectious diseases). This preparedness should include disaster plans to protect employees and the environment as far as possible from the effects of possible disasters which may arise.

### **Tax Evasion Prevention**

We take our duties and responsibilities under the Criminal Finances Act 2017 (CFA 2017) seriously, including the obligation to prevent tax evasion. Our suppliers shall ensure that they and any persons associated with our suppliers shall not by any act or omission commit, or cause, facilitate or contribute to the commission by any person (including Westcoast as a customer), of a (i) corporate failure to prevent offence, (ii) UK tax evasion offence or (iii) foreign tax evasion offence (all as defined under the CFA 2017) in connection with the provision of the goods and/or services to Westcoast.

Our suppliers must not and shall ensure that any person associated with our suppliers shall not solicit or engage with or take steps to solicit or engage with any person associated with Westcoast to facilitate the commission of a UK tax evasion offence or a foreign tax evasion offence in connection with the provision of goods and/or services to Westcoast.

Our suppliers shall, and shall procure that any person associated with our suppliers shall, pay, in full and in a timely manner, all taxes due and payable relating to all monies, remuneration, profit and value received or payable by our suppliers or persons associated with our suppliers in connection with the provision of goods or services to Westcoast or otherwise.

### **Compliance with this Code**

Suppliers should communicate the principles in this Code to its subcontractors and other business partners who are involved in supplying any of the products and services. The supplier should motivate them to adhere to the same standards and take action to monitor performance.

We expect openness and transparency in our relationships with our suppliers. Transparency includes maintaining documentation necessary to demonstrate compliance with these principles. Westcoast may exercise its relevant contractual rights to access this documentation and raise reasonable enquires.

Unethical business practices will be reported. Whatever criminal violations of laws are suspected, these should be reported to the appropriate authorities for possible prosecution, with any other violations being reported, investigated and dealt with suitably.

**Westcoast will consider any breach of the obligations stipulated in this Code as a material breach by the supplier.**