

SUPPLIER CODE of CONDUCT

Our code of conduct outlines the principles by which Leiths (Scotland) Ltd Group seek to operate our business.

The Leiths Group is committed to operating its business in compliance with applicable laws and regulations and to developing appropriate chains of responsibility within our sphere of influence.

The Supplier Code of Conduct sets out the minimum standards we expect of ourselves and those who work with us. The code cannot cover every scenario and we expect everyone to use common sense and good judgement in its application.

We have made a commitment to work only with those whose standards are consistent with ours.

The Code Applies to:

Leiths Group: We have our own internal policies which set and drive the standards of behaviour within our organisation with which our colleagues are expected to comply.

Our suppliers: Suppliers are the collective name we give to our suppliers, sub-contractors, business partners, service providers, professional services providers, consultants, intermediaries and agents, all of whom we expect to comply with the code.

Our suppliers' supply chain: You must ensure that the practices and principles outlined in the code flow down throughout your supply chain, irrespective of conflicting local business practices and customs.

Compliance with the law

As a supplier to Leiths, you and your suppliers shall be aware of all relevant laws, policies, rules and regulations relevant to your business activity in the jurisdiction you operate in, both those in existence now or introduced or amended in the future.

Comply with all Relevant Laws.

Communicate the existence of and need to comply with all Relevant Laws with your supply chain and workforce.

Ethical Standards

As a supplier of Leiths, you and your suppliers shall maintain high standards of integrity, professionalism, honesty and fair dealing.

Not commit any act which may impact on our reputation.

Conduct your business in an open and ethical manner, with respect for human dignity and rights.

Always maintain high standards of social responsibility.

Avoid conflicts of interest and not try to gain improper advantage of preferential treatment for other relationships you may have with us.

Open and Fair Competition

As a supplier of Leiths, you and your suppliers shall practice fair competition, openly and honestly.

Not engage in any agreement, arrangement, concerted practice, information exchange or behaviour in breach of any UK, Irish, EU or other applicable competition laws in force from time to time.

Not participate in bid rigging or other mechanism which limits fair competition in any tender process.

Not participate in any other form of cartel practices with competitors, such as price fixing, carving up territories or allocating customers.

Health and Safety

As a supplier of Leiths, you and your suppliers shall recognise and comply with Leiths safety commitments.

Strive to achieve zero harm due to work activities.

Work with us to achieve a healthy and safe working environment for everyone.

Ensure your workers and your supply chain are adequately trained and provided with the proper equipment to perform their duties.

Recognise that all workers have a right and an obligation to stop unsafe work.

Report and learn from all incidents at our sites.

False Claims and Tax Offences

As a supplier of Leiths, you and your suppliers shall not claim for something which you are not entitled to.

Not knowingly or recklessly misrepresent the amount of time spent or materials used.

Not conceal defects, falsify records or fabricate evidence in relation to a claim.

Account for and pay all taxation when due to the relevant authorities.

Do not either knowingly or unknowingly engage in the facilitation of tax evasion and take reasonable steps to prevent the facilitation of tax evasion.

Bribery and Corruption

As a supplier of Leiths, you and your suppliers shall conduct your business with integrity.

Never give, offer or receive bribes either directly or indirectly or accept improper payments.

Never make facilitation payments even if permitted under local law.

Ensure all reports, records and invoices are complete, accurate and not misleading.

Respect our position and policy on gifts and hospitality.

Comply with the UK's Bribery Act 2010 irrespective of the jurisdiction in which you operate.

Bullying, Harassment and Discrimination

As a supplier of Leiths, you and your suppliers shall provide equal treatment and opportunities for all workers.

Not tolerate bullying, discrimination, harassment or unwanted sexual behaviour.

Not coerce, intimidate or discriminate against anyone.

Create an inclusive working environment for all.

Modern Slavery

As a supplier of Leiths, you and suppliers shall not use child labour or any form of forced, bonded or involuntary labour.

Comply with the provisions of the UK's Modern Slavery Act 2016 irrespective of the jurisdiction in which you operate in ensuring there is no modern slavery within your supply chain and work with us to ensure we maintain compliance.

Have a zero-tolerance approach for human trafficking.

Not allow any practice which would restrict free movement of employees.

Ensure all working conditions, hours, wages and benefits comply with Relevant Laws.

Protection of Personal Data

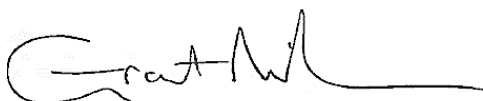
As a supplier of Leiths, you and your suppliers shall only use all personal data in accordance with applicable laws and regulations.

Not use any of our personal data for reasons not permitted by us.

Not share or disclose any of our personal data without our consent.

Ensure all appropriate safeguards are in place to protect our personal data from unauthorised access.

Comply with the provisions of the General Data Protection Regulation (GDPR).



Grant Milne
CEO

Leiths (Scotland) Ltd
27th April 2023

