

POLICY

# Natural Power's supplier code of conduct

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At Natural Power we pride ourselves on the market leading advice and services we provide to our clients and upholding our business values, culture and ethical reputation. We show this in our commitment to act in a sustainable, ethical and socially responsible manner. These standards and behaviours apply across all our business activities, whether interacting with colleagues, clients, partners, suppliers or the communities we operate in.

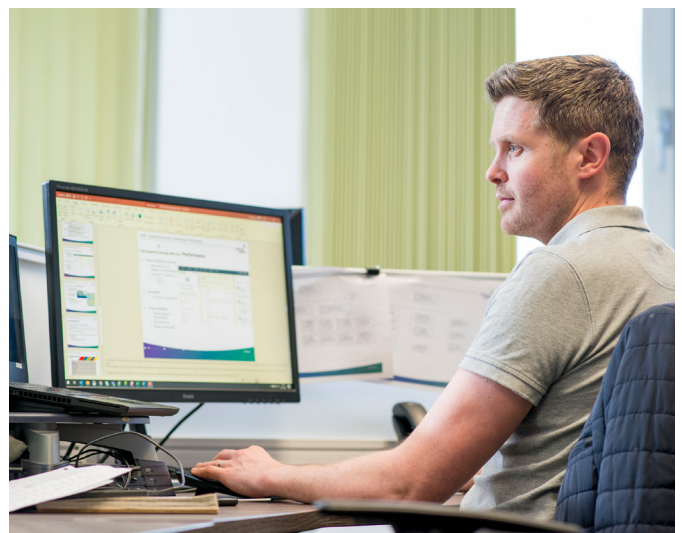
## Where this code of conduct applies and who it applies to

### Employees

This code of conduct applies equally without exception to everyone within the business.

As an international business, this code of conduct applies to all our business activities around the world, including our supply chain. We all must fully comply with the laws and regulations of each country we operate in. In the event of any conflict between this code of conduct and polices and applicable laws, we will follow the stricter ruling.

This code of conduct is not intended to describe every applicable policy or law. It provides a guide to the key legal and ethical issues that may occur during our business activities with suppliers.



### Suppliers

This code applies to everyone we call a supplier, including suppliers, subcontractors, service providers, professional service providers, consultants, intermediaries and agents. Prior written acceptance of this code is required before work begins. As a supplier you must ensure you inform your own supply chain of the practices and principles outlined in this code of conduct and that it adheres to them.

This code applies to activities in the locations where suppliers' goods are produced, where any related services are performed and where the goods enter the supply chain. Natural Power may conduct audits to ensure compliance and seek evidence of ongoing commitment and due diligence.

Any breaches of this code of conduct will be thoroughly and fairly investigated in accordance with the company's policies.



## Supplier responsibilities

As our supplier you must ensure that you advise Natural Power of:

- any relevant issues that are inconsistent with this code;
- any violations of this code and take the necessary corrective actions to remediate the noncompliance and promote compliance

## Data Protection & Confidentiality

We expect our suppliers to comply with relevant Data Protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Suppliers must tell us immediately if they become aware of anything which could adversely affect the safety and security of the personal data of consumers, firms or employees.

Our suppliers must not use or disclose (accidentally or otherwise) any information belonging to us, our existing and prospective customers, other suppliers, employees or other third parties, except as required or authorised by us. In the event of a failure to comply with this requirement, suppliers must provide us with full details of the failure immediately.

## Anti-bribery and anti-corruption

We will compete to win and deliver work in a fair and ethical way, and we expect the same from our supply chain. We have zero tolerance for any form of corruption or bribery, and we will forgo any business that can only be retained through improper or illegal methods.

We follow the letter and the spirit of competition laws.

As an international business, we recognise that laws such as the UK Bribery Act and the US Foreign Corrupt Practices Act apply not only in those individual countries but in all countries that we operate in. We will not pay or receive a bribe, gratuity, gift or kickback to or from a client, supplier, agent or other business to win or award business.

With regards to anti-bribery and anti-corruption, you must follow the following guidance:

- Never seek to gain any advantage of any kind by acting fraudulently, deceiving people of making false claims, or allow anyone to do so on yours or our behalf. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property.
- You are expected to fully comply with your tax obligations. Tax evasion is the illegal and fraudulent non-payment of tax. We never engage in tax evasion or assist anyone else to do so.
- Always tell us about any attempt to bribe you or solicit bribes from you and any suspicions you have about bribery and corruption.
- You will take appropriate steps to safeguard and maintain confidential information and use such information only for the purposes authorised by Natural Power.
- You must disclose any situation that may appear to be a conflict of interest.

## Ethical Business Practices

As a supplier to Natural Power, you will:

- conduct your business in accordance with the highest standards of ethical behaviour and in accordance with all applicable laws and regulations. This includes those in relation to international labour laws;
- not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of fair competition laws;
- respect the intellectual property rights of others.

## Health, safety, environment and quality

We all have a duty to our colleagues, their families, our contractors, communities and the environment to always work in a safe and sustainable way. We will not compromise on those standards to achieve short-term commercial or performance gains.

Suppliers shall carry out their works in a manner that protects the health, safety and wellbeing of their own personnel and any other party that may be affected by their activities. Suppliers shall always conduct themselves in a responsible manner while carrying out works on behalf of Natural Power.

We care about the natural world and recognise our responsibilities. We therefore require you to share our commitment to:

- comply with all applicable environmental laws and regulations;
- continually improve your environmental performance and results and to review them on a regular basis, and, where possible, this will happen through a reduction in greenhouse gas emissions, energy efficiency initiatives, and reduction and recycling of natural resources, including water and paper/packaging materials;
- the proper handling and storing of hazardous materials and waste, and, where applicable, have plans for dealing with discharges of hazardous wastes and disposal of them in a safe and legal manner.

## Bullying, harassment and discrimination

We are committed to creating an inclusive working environment where everyone is respected, irrespective of diversity, and can flourish equally without fear or favour. We do not tolerate behaviour or attitudes that support coercion, intimidation or discrimination. Whenever and wherever we observe such behaviour, we will challenge it and encourage and support others who do so. We expect the same from our supply chain.

## Employment and Modern Slavery Legislation

The Modern Slavery Act 2015 came into effect in March 2015 and is the first of its kind in Europe. The legislation enhances the support and protection for victims of human trafficking and enslavement.

Natural Power will not forge commercial relationships with any business knowingly involved with slavery or human trafficking, and we expect the same from our supply chain. Natural Power is wholly supportive of the Act and expect the following from all our approved suppliers:

- Abide by and be consistent with the relevant modern slavery legislation for the country in which you operate.
- Employ all employees on a voluntary basis and do not use any prison, slave bonded, forced or indentured labour, or engage in any other forms of compulsory labour or any other forms of slavery and human trafficking.
- Recognise the unique legal, social, and cultural situations that migrant workers face and will ensure that such workers are treated with dignity, respect and in accordance with the same standards as apply to other workers.
- Comply with the laws and regulations to minimum working age. No employee of any age, including apprentices or vocational students, may be employed in breach of local regulations governing the minimum age of work or the compulsory age for schooling, consistent with ILO Minimum Age Convention No 138.