

SUPPLIER CODE OF CONDUCT POLICY



We work with partners who share our standards – straight talking, responsible, secure, people-focused and planet-positive. If you want to work with us, this is the playbook: be ethical, protect information, meet your obligations, and help us raise the bar across our supply chain.

INTRODUCTION

This policy sets out the standards we expect from every supplier we work with. It is issued to all suppliers during onboarding, and suppliers are responsible for understanding and complying with these requirements.

As a **B Corp certified firm**, we're committed to doing business in a way that's ethical, transparent and genuinely positive for people and the planet. Our responsibilities span every aspect of how we operate - from integrity, quality and security to inclusion and sustainability – and we hold our partners to the same high standards.

We expect suppliers to mirror these principles, because the way our partners operate directly shapes the impact we make. This policy provides **clear expectations, shared values** and a **consistent framework** for building strong, accountable and future-focused supplier relationships.

SCOPE

This Policy applies to all suppliers, contractors, outsourced service providers, and subcontractors delivering goods or services to Cooper Parry. Suppliers are responsible for ensuring their subcontractors follow the same standards.

POLICY

SUPPLIER EXPECTATIONS – ETHICAL CONDUCT & WAYS OF WORKING

How our suppliers operate directly shapes the value we deliver - to clients, our people and the planet. We expect suppliers to act ethically, responsibly and in line with our standards:

- Keeping invoices, financial and delivery records accurate and complete.
- Avoiding false reporting, concealed information or misleading statements.
- Cooperating with due diligence checks, audits and information requests.
- Comply with all relevant laws and recognised good practice principles.
- Treat people fairly and with respect.
- Protect confidential information and data.
- Manage social and environmental impacts responsibly and proactively.
- Operating honestly, with no shortcuts or grey areas.
- Avoiding bribery, kickbacks or anything that could improperly influence decisions.
- Declaring any actual or potential conflicts of interest early.

MODERN SLAVERY AND HUMAN TRAFFICKING

Suppliers must take all necessary steps to ensure that modern slavery, forced labour, human trafficking, and exploitative labour practices are not taking place within their operations or supply chains. Suppliers are expected to have in place a formal modern slavery policy (or equivalent controls) aligned with applicable legislation, including the UK Modern Slavery Act 2015, and to maintain appropriate due diligence processes, risk assessments, and training. Upon request, suppliers must be able to demonstrate compliance, including providing copies of their policy, evidence of monitoring activities, and any remediation actions undertaken. Any identified breaches must be promptly reported and addressed, and failure to comply may result in termination of the business relationship.

HUMAN RIGHTS, FAIR TREATMENT & SAFETY

Suppliers must protect the rights and wellbeing of people in their operations:

- Ensuring safe, fair and respectful working conditions.
- Prohibiting forced labour, child labour and discriminatory practices.
- Allowing people to raise concerns safely without retaliation.

DATA PROTECTION, SECURITY & CONFIDENTIALITY

Suppliers must protect Cooper Parry's information using security measures that meet our minimum requirements. This includes personal data, confidential information and any system access provided.

Minimum requirements:

- Follow all applicable data protection laws (including UK GDPR and DPA 2018).
- Use information only for the services agreed with Cooper Parry.
- Keep data secure using appropriate controls (e.g., access control, encryption, secure storage).
- Ensure staff handling Cooper Parry information are trained and authorised.
- Report any suspected or actual data breach to Cooper Parry without undue delay and in any event within 24 hours of becoming aware.
- Provide evidence of compliance on request and allow reasonable audits or assessments.
- Not transfer personal data outside the UK (or approved jurisdictions) without appropriate safeguards (e.g. UK IDTA / adequacy regulations).
- Only use subcontractors or cloud services for Cooper Parry data with our approval, and ensure they meet the same standards.
- Return or securely delete Cooper Parry information at the end of the relationship, or when requested.
- Do not share or disclose information to third parties unless approved in writing.

SUSTAINABILITY & ENVIRONMENTAL RESPONSIBILITY

We're serious about reducing our environmental impact - and we expect our suppliers to be part of that journey. Our target to become Net Zero by 2045 is validated by the Science Based Targets initiative (SBTi), and we want to work with partners who share the same level of ambition and accountability.

- SBTi alignment: Suppliers are expected to work towards adopting SBTi-aligned emissions-reduction targets within five years of onboarding.
- Annual environmental reporting: Suppliers should provide annual emissions data (Scope 1, Scope 2 and any relevant Scope 3).
- Renewable energy & low-carbon operations: Use renewable energy where possible, and reduce carbon intensity in logistics, operations and supply chains.
- Continuous improvement: Demonstrate year-on-year progress in environmental performance.
- Sustainability reviews: Cooper Parry may conduct periodic sustainability audits. Where performance falls short, improvement actions will be agreed; ongoing non-compliance may lead to phased disengagement.
- Transparency: Suppliers must be open about sustainability performance, including publicly sharing emissions reduction targets and progress where appropriate.

SUPPLIER ONBOARDING & DUE DILLIGENCE REQUIREMENTS

Before any work begins or an order is issued, all suppliers must complete the Cooper Parry onboarding process. This helps us confirm that suppliers meet our standards on quality, risk, compliance and sustainability. Suppliers must provide accurate information during onboarding and update Cooper Parry if anything material changes.

Minimum onboarding requirements:

- Supplier Onboarding Form – Microsoft form link provided by procurement team
- Supplier Code of Conduct Form – Microsoft form link provided by procurement team
- Supply Chain Assessment Document – excel document provided by procurement team
- Provide required documentation such as insurance certificates, data protection information, policies, certifications, sustainability credentials, and any other items requested.

Internal due diligence (completed by CP):

- Information security and IT security review
- Data Protection Impact Assessment if required
- Any additional risk-based assessments where needed

INVESTIGATIONS, OUTCOMES AND FAIRNESS

- Cooper Parry will investigate concerns promptly, proportionately, and fairly.
- Anyone involved will be treated with respect, and information will be handled sensitively and, where possible, confidentially.
- Outcomes will depend on facts, risk, and severity and may include coaching, training, management action, disciplinary action, contract remedies, or reporting to relevant authorities where required.
- False or malicious allegations (made knowingly and without good faith) may result in action; this does not apply to concerns raised honestly that turn out to be unsubstantiated.
- Breaches may lead to disciplinary action and/or termination of contracts, consistent with applicable law and firm policy.

PROCUREMENT RESPONSIBILITIES

As part of supplier selection and ongoing management, Cooper Parry's procurement representatives must:

- Select suppliers fairly, transparently and based on evidence.
- Avoid conflicts of interest and declare any that arise.
- Raise concerns where supplier practices appear unsafe, unlawful, unethical or inconsistent with our standards.

COMPLIANCE / RESPONSIBILITIES

The Procurement Team is responsible for maintaining this Policy, overseeing supplier onboarding, and ensuring suppliers meet compliance requirements.

Suppliers are responsible for:

- Understanding and following this Policy.
- Ensuring their employees and subcontractors comply with its requirements.
- Providing accurate onboarding information and keeping documentation up to date.
- Reporting risks, incidents or changes that may impact compliance.

Compliance may be monitored through reviews, audits and ongoing assurance. Non-compliance may result in corrective actions, paused or terminated contracts, or additional controls depending on severity.

Questions or clarifications should be directed to:

Procurement Inbox – procurement@cooperparry.com

APPENDICES / REFERENCES

- [Link to Supplier Code of Conduct](#)
- [Link to Supplier Onboarding Form](#)
- Supply Chain Assessment Document
- Information Security and Acceptable Use policies and standards
- Data protection policies and procedures
- UK Data Protection Act 2018 and UK GDPR
- Worker Protection (Amendment of Equality Act 2010) Act 2023

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