

CUNDALL

STATEMENT

# Supplier Code of Conduct



# Our commitment



Carole O'Neil

Managing Partner

A handwritten signature in blue ink that reads "C. O'Neil".

Our Supplier Code of Conduct is a vital document that reflects our commitment to ethical business practices, sustainability, and corporate responsibility. It sets clear expectations for our suppliers, ensuring that every partner we work with upholds the same high standards of integrity, respect for human rights, and environmental stewardship that we value. Adhering to this Code is not just about compliance; it's about fostering a culture of excellence and accountability across our entire supply chain. We believe that by working together under these principles, we can drive positive change, build stronger relationships, and achieve sustainable success for all stakeholders"

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# 1.0 Introduction

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# Introduction

At Cundall, we are committed to building a business that exists to benefit our employees, clients, and the broader community while ensuring we protect and sustain our planet. Since our founding, we have been guided by our core values, which shape how we work and interact with each other and our partners. Our Supplier Code of Conduct is designed to extend these values beyond our organization to all those who work with us.

## 1.1 Purpose and Scope

This Supplier Code of Conduct outlines the principles and expectations that we require our suppliers to adhere to in their operations. It serves as a guide to ensure that our suppliers conduct business in a manner that aligns with our core values and ethical standards. This document applies to all suppliers, contractors, consultants, and other business partners who provide goods or services to Cundall and our affiliates.

## 1.2 Our Core Values

### We Are Creative:

We think differently and go beyond expectations to design solutions that our clients love. We invest in research and development, continuously evolving to face future challenges.

### We Collaborate:

We foster amazing teams through open communication and mutual support. We share knowledge, provide honest feedback, and build strong relationships with colleagues, industry peers, and clients.

### We Strive For Excellence:

We aim for outstanding performance in all our projects. We continuously improve by learning from successes and failures and adhering to robust systems and processes.

### We Behave With Integrity:

We operate with a strong moral code, keeping our promises and helping others. We are honest, courteous, and kind, considering others' priorities and fostering a culture of care.

## 1.3 Non-Negotiables

In executing our strategy and living our values, we adhere to several non-negotiables that guide our decision-making and ensure we maintain the highest standards:

### Partnership:

We are an independent business, committed to the long-term success and well-being of our employees and stakeholders.

### Commercially Astute:

We select projects carefully to ensure profitability and provide challenging, rewarding work for our people.

### Technical Excellence:

We strive for technical excellence in all aspects of our work, fostering a culture of lifelong learning and development.

### One Cundall:

We operate as a unified practice globally, sharing ideas and building inclusive teams to drive continuous improvement.

### Sustainable, Ethical, Caring:

We care for our employees, clients, and the environment, promoting sustainability and ethical practices in all we do.

### Global Perspective:

We operate as a single, integrated business with a focus on global success, leveraging the best ideas and people from across our organization.

## 1.4 Commitment to Ethical Practices

We expect our suppliers to share our commitment to ethical practices and to operate in compliance with all applicable laws and regulations. This includes upholding human rights, ensuring fair labour practices, maintaining safe and healthy working conditions, and protecting the environment.

By adhering to this Supplier Code of Conduct, our suppliers help us to deliver exceptional value to our clients and make a positive impact on the communities we serve. We look forward to building strong, mutually beneficial relationships with suppliers who share our values and commitment to ethical business practices.

## 2.0 Purpose and Scope

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## 2.1 Purpose

The purpose of this Supplier Code of Conduct is to articulate clearly the principles and expectations that Cundall has for its suppliers, contractors, consultants, and other business partners. This Code is designed to ensure that our suppliers conduct their operations in a manner that aligns with our core values of integrity, sustainability, collaboration, and excellence. By adhering to this Code, our suppliers contribute to our mission of delivering exceptional and sustainable outcomes for our clients, our employees, and the communities we serve.

## 2.2 Scope

This Supplier Code of Conduct applies to all suppliers, contractors, consultants, and other business partners who provide goods or services to Cundall and our affiliates. The scope of this document includes, but is not limited to, the following areas:

### 1. Compliance with Laws and Regulations

Suppliers must comply with all applicable laws, regulations, and standards in the countries where they operate. This includes adherence to anti-corruption laws, labour laws, environmental regulations, and health and safety standards.

### 2. Ethical Business Practices

Suppliers are expected to uphold the highest standards of ethical conduct, including avoiding conflicts of interest, practicing fair competition, and ensuring transparency and accuracy in all business dealings.

### 3. Human Rights and Labour Practices

Suppliers must respect and promote human rights, ensuring fair labour practices, prohibiting forced labour and child labour, and providing a safe and healthy working environment.

### 4. Health, Safety, and Environmental Responsibility

Suppliers must prioritise the health and safety of their employees and the communities in which they operate. They should adopt sustainable practices that minimize environmental impact and contribute to the well-being of the planet.

### 5. Quality and Continuous Improvement

Suppliers are expected to deliver high-quality goods and services that meet or exceed the standards set by Cundall. They should engage in continuous improvement practices to enhance their performance and capabilities.

### 6. Data Protection and Confidentiality

Suppliers must ensure the protection of confidential information and comply with data protection regulations. This includes safeguarding intellectual property and sensitive data belonging to Cundall and our clients.

By adhering to this Supplier Code of Conduct, suppliers help Cundall maintain its reputation for integrity, excellence, and sustainability. We are committed to building strong, long-term relationships with suppliers who share our values and commitment to ethical business practices.

# 3.0 Principles

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*"We recognise that our suppliers are an extension of our business, and their adherence to our core principles is crucial to our collective success. We are committed to fostering strong partnerships built*

*on shared values of integrity, sustainability, and excellence. By aligning with suppliers who uphold the highest standards in ethical conduct, human rights, environmental stewardship, and quality management, we ensure that our supply chain operates with the utmost responsibility and effectiveness. These principles are not just guidelines but the foundation upon which we build trust, innovation, and long-term success. Together, we can achieve remarkable outcomes that benefit our clients, communities and the environment"*

**Carole O'Neil, Managing Partner**

At Cundall, we believe that our suppliers are an extension of our own operations and play a critical role in our success. To maintain our high standards of business conduct, we expect our suppliers to adhere to the following principles:

### 3.1 Integrity and Ethical Behaviour

- **Compliance with Laws and Regulations:** Suppliers must comply with all applicable local, national, and international laws and regulations, including those related to anti-corruption, bribery, and fair competition.
- **Honesty and Transparency:** Suppliers must conduct their business honestly, transparently, and with the highest ethical standards. Any form of fraud, misrepresentation, or deceit is strictly prohibited.

### 3.2 Human Rights and Fair Labour Practices

- **Respect for Human Rights:** Suppliers must respect the human rights of their employees and the communities in which they operate, ensuring fair treatment and dignity for all.
- **No Forced or Child Labour:** Suppliers must not engage in or support the use of forced, bonded, or indentured labour, and must prohibit the use of child labour in their operations.
- **Fair Wages and Working Hours:** Suppliers must provide fair compensation that meets or exceeds the legal minimum wage and ensure that working hours are not excessive and comply with local laws.

### 3.3 Health, Safety, and Environment

- **Health and Safety Standards:** Suppliers must provide a safe and healthy working environment for their employees, complying with all relevant health and safety laws and regulations. They should strive to prevent workplace accidents and injuries through proper training and safety measures.
- **Environmental Stewardship:** Suppliers must operate in an environmentally responsible manner, minimizing their impact on the environment through sustainable

practices, waste reduction, and resource conservation.

### 3.4 Quality and Continuous Improvement

- **Commitment to Quality:** Suppliers must deliver goods and services that meet or exceed the quality standards set by Cundall. They should have robust quality management systems in place to ensure consistency and reliability.
- **Continuous Improvement:** Suppliers should continuously seek ways to improve their processes, products, and services. This includes investing in innovation, adopting best practices, and responding to feedback from Cundall.

### 3.5 Anti-Corruption and Fair Competition

- **Zero Tolerance for Bribery and Corruption:** Suppliers must not engage in any form of bribery, corruption, extortion, or embezzlement. They should have policies and procedures in place to prevent such practices.
- **Fair Competition:** Suppliers must compete fairly in the marketplace, respecting antitrust and competition laws. They should avoid any anti-competitive behaviour that could harm Cundall or our stakeholders.

### 3.6 Confidentiality and Data Protection

- **Protection of Confidential Information:** Suppliers must safeguard any confidential information shared by Cundall and use it only for the purposes authorised. They should implement appropriate measures to protect data from unauthorised access or disclosure.
- **Compliance with Data Protection Laws:** Suppliers must comply with all applicable data protection and privacy laws, ensuring the secure handling and processing of personal data.

By adhering to these principles, suppliers help Cundall maintain our reputation for excellence, integrity, and sustainability. We look forward to collaborating with suppliers who share our commitment to these values and to fostering long-term, mutually beneficial relationships.

# 4.0 Human Rights and Labour Standards

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*"We are unwavering in our commitment to upholding human rights and ensuring fair labour practices across all aspects of our operations. We believe that every individual deserves to be treated*

*with dignity, respect, and fairness, and this principle guides our interactions with employees, suppliers, and communities. By enforcing stringent human rights and labour standards, we not only comply with international regulations but also foster a culture of equality and inclusivity. We expect our suppliers to adhere to these same high standards, ensuring that together, we create a just and equitable working environment where everyone has the opportunity to thrive"*

**Carole O'Neil, Managing Partner**

At Cundall, we are committed to upholding and promoting human rights and fair labour practices throughout our supply chain. We expect our suppliers to share this commitment and to ensure that their operations and business practices respect and protect the rights and dignity of all individuals. The following standards outline our expectations for suppliers regarding human rights and labour practices:

#### 4.1 Respect for Human Rights

- **Fundamental Rights:** Suppliers must respect and uphold the fundamental human rights of all individuals, as outlined in the Universal Declaration of Human Rights and other applicable international human rights instruments.
- **Non-Discrimination:** Suppliers must provide a workplace free from discrimination, harassment, and abuse. Employment decisions must be based on merit, qualifications, and abilities, without regard to race, colour, ethnicity, gender, sexual orientation, religion, disability, age, or any other characteristic protected by law.

#### 4.2 Fair Labour Practices

- **No Forced or Compulsory Labour:** Suppliers must not use any form of forced, bonded, or involuntary labour. All work must be conducted on a voluntary basis, and workers must be free to leave their employment after reasonable notice.
- **Prohibition of Child Labour:** Suppliers must not employ children in any stage of their operations. The minimum age for employment must comply with local laws and international standards, and must not be lower than the age for completing compulsory education.
- **Fair Wages and Benefits:** Suppliers must provide wages and benefits that meet or exceed the legal minimum standards in their country of operation. Compensation should be sufficient to meet the basic needs of employees and their families.
- **Working Hours:** Suppliers must comply with applicable laws and industry standards on working hours, including overtime. Employees should not be

required to work excessive hours and must be granted reasonable rest periods and time off.

- **Freedom of Association and Collective Bargaining:** Suppliers must respect the rights of employees to freely associate, join or not join labour unions, seek representation, and bargain collectively. Employees should be able to communicate openly with management regarding working conditions without fear of retaliation, harassment, or intimidation.

#### 4.3 Safe and Healthy Working Conditions

- **Workplace Safety:** Suppliers must provide a safe and healthy working environment for all employees, in compliance with local laws and international standards. This includes implementing appropriate health and safety policies, procedures, and training programs to prevent accidents and injuries.
- **Emergency Preparedness:** Suppliers must have effective emergency plans and response procedures in place to address potential workplace hazards, including fire, chemical exposure, and natural disasters. Employees should be trained on these procedures and have access to necessary safety equipment.
- **Health and Wellbeing:** Suppliers must take proactive steps to promote the health and wellbeing of their employees, including access to clean drinking water, sanitary facilities, and appropriate medical care.

#### 4.4 Grievance Mechanisms

- **Access to Grievance Procedures:** Suppliers must provide employees with accessible and effective grievance mechanisms to raise concerns or report violations of labour practices without fear of retaliation. These mechanisms should be transparent, confidential, and impartial.
- **Resolution of Complaints:** Suppliers must investigate and address any complaints or grievances promptly and fairly. Corrective actions should be implemented to resolve issues and prevent recurrence.

By adhering to these human rights and labour standards, suppliers help Cundall ensure that our supply chain operates with respect for human dignity and fairness. We are committed to working with suppliers who share our dedication to ethical labour practices and the protection of human rights.

# 5.0 Health, Safety, and Environment



*"The health and safety of our employees, partners, and communities, along with our commitment to environmental stewardship, are at the forefront of our operational priorities. We*

*believe that a safe and healthy work environment is not only a fundamental human right but also a key driver of productivity and morale. Our dedication to protecting the environment through sustainable practices ensures that we contribute positively to the planet and future generations. By prioritizing health, safety, and environmental responsibility, we uphold our values and create a culture where everyone can thrive. We expect our suppliers to share this commitment, ensuring that together, we can build a safer, healthier, and more sustainable world"*

#### **Carole O'Neil, Managing Partner**

At Cundall, the health, safety, and wellbeing of our employees, suppliers, and the communities in which we operate are of paramount importance. We are committed to promoting a safe and healthy work environment and to minimizing our environmental impact. We expect our suppliers to share this commitment and to uphold the following standards in their operations:

### **5.1 Health and Safety Standards**

- **Safe Work Environment:** Suppliers must provide a safe and healthy workplace for all employees, in compliance with all applicable health and safety laws and regulations. This includes identifying, assessing, and mitigating potential hazards to prevent accidents, injuries, and illnesses.
- **Safety Management Systems:** Suppliers should implement effective health and safety management systems, policies, and procedures to ensure continuous improvement in safety performance. This includes regular risk assessments, safety audits, and incident reporting.
- **Training and Awareness:** Suppliers must provide employees with appropriate health and safety training and ensure they are aware of potential hazards and safe work practices. Training should be conducted regularly and whenever new risks or processes are introduced.
- **Emergency Preparedness:** Suppliers must develop and maintain emergency preparedness and response plans to address potential workplace hazards, such as fires, chemical spills, and natural disasters. Employees should be trained on emergency procedures and have access to necessary safety equipment.
- **Incident Reporting and Investigation:** Suppliers must have mechanisms in place for employees to report health and safety incidents, near misses, and unsafe conditions without fear of retaliation. All incidents should be promptly investigated, and corrective actions should be taken to prevent recurrence.

### **5.2 Environmental Responsibility**

- **Environmental Compliance:** Suppliers must comply with all applicable environmental laws, regulations, and standards. This includes obtaining and maintaining necessary environmental permits and licenses and adhering to their requirements.
- **Sustainable Practices:** Suppliers should strive to minimize their environmental impact through sustainable practices, such as reducing waste, conserving energy and water, and lowering greenhouse gas emissions. Suppliers are encouraged to adopt environmentally friendly technologies and processes.
- **Resource Efficiency:** Suppliers must use resources efficiently, including raw materials, energy, and water. Efforts should be made to reduce resource consumption, reuse materials, and recycle waste wherever possible.
- **Pollution Prevention:** Suppliers must take proactive measures to prevent pollution and minimize the release of harmful substances into the environment. This includes proper handling, storage, and disposal of hazardous materials and waste.
- **Biodiversity and Land Use:** Suppliers should consider the impact of their operations on biodiversity and land use. Efforts should be made to protect natural habitats, reduce deforestation, and promote the sustainable use of land and resources.

### **5.3 Continuous Improvement**

- **Monitoring and Reporting:** Suppliers should regularly monitor and report on their health, safety, and environmental performance. This includes tracking key performance indicators, conducting internal audits, and reporting progress to Cundall.
- **Stakeholder Engagement:** Suppliers are encouraged to engage with stakeholders, including employees, local communities, and regulatory authorities, to address health, safety, and environmental concerns. Open and transparent communication helps build trust and fosters collaboration.
- **Innovation and Best Practices:** Suppliers should continuously seek to improve their health, safety, and environmental performance by adopting best practices, innovative technologies, and new approaches. Sharing knowledge and learning from others helps drive progress and achieve better outcomes.

By adhering to these health, safety, and environmental standards, suppliers help Cundall ensure a safe and sustainable supply chain. We are committed to working with suppliers who share our dedication to protecting the health and wellbeing of people and the environment.

# 6.0 Ethical Business Practices



*"Ethical business practices form the cornerstone of our corporate philosophy. Integrity, honesty, and transparency are non-negotiable values that guide our actions and decisions. We believe that*

*conducting business ethically not only builds trust with our clients and stakeholders but also fosters a culture of accountability and respect. Our commitment to ethical practices extends to our entire supply chain, ensuring that we collaborate with partners who share our dedication to upholding the highest standards of conduct. Together, we can create a business environment where fairness and responsibility lead to sustainable success"*

#### **Carole O'Neil, Managing Partner**

At Cundall, we are committed to conducting business with the highest ethical standards. We expect our suppliers to uphold these standards and to engage in practices that reflect integrity, fairness, and transparency. The following principles outline our expectations for ethical business conduct:

### 6.1 Compliance with Laws and Regulations

- **Adherence to Legal Standards:** Suppliers must comply with all applicable local, national, and international laws and regulations. This includes laws related to labour, health and safety, environmental protection, anti-corruption, and fair competition.
- **Regulatory Compliance:** Suppliers must obtain and maintain all necessary licenses, permits, and registrations required for their operations. They should ensure that their practices are in line with the latest legal and regulatory requirements.

### 6.2 Anti-Corruption and Bribery

- **Zero Tolerance for Corruption:** Suppliers must not engage in any form of bribery, corruption, extortion, or embezzlement. This includes offering, giving, receiving, or soliciting anything of value to influence the actions of others.
- **Anti-Bribery Policies:** Suppliers should implement and enforce robust anti-bribery and anti-corruption policies and procedures. These should include mechanisms for preventing, detecting, and responding to bribery and corruption incidents.
- **Facilitation Payments:** Suppliers must not make facilitation payments, even if such payments are common practice or permitted by local laws. Facilitation payments are small payments made to expedite routine government actions.

### 6.3 Fair Competition

- **Antitrust and Competition Laws:** Suppliers must comply with all applicable antitrust and competition laws. They should avoid engaging in practices that restrict competition, such as price-fixing, bid-rigging, or market allocation.

- **Competitive Practices:** Suppliers should compete fairly and ethically in the marketplace. They should not use deceptive or unfair practices to gain an advantage over competitors.

### 6.4 Conflicts of Interest

- **Avoiding Conflicts:** Suppliers must avoid situations where personal or financial interests conflict with their duties and responsibilities to Cundall. Any potential conflicts of interest must be disclosed to Cundall immediately.
- **Transparency:** Suppliers should act in the best interests of Cundall and avoid any activities that could compromise our impartiality or objectivity. This includes not accepting or offering gifts, favours, or entertainment that could influence business decisions.

### 6.5 Accurate Record Keeping and Reporting

- **Financial Integrity:** Suppliers must ensure that all business records and reports are accurate, complete, and transparent. This includes financial statements, invoices, and other documentation related to their business operations.
- **Honest Reporting:** Suppliers must not engage in any form of misrepresentation or falsification of records. They should maintain accurate and truthful records that reflect the true nature of their transactions.

### 6.6 Confidentiality and Data Protection

- **Protection of Information:** Suppliers must safeguard any confidential information shared by Cundall and use it only for authorised purposes. They should implement measures to protect data from unauthorised access, disclosure, or misuse.
- **Data Privacy:** Suppliers must comply with all applicable data protection and privacy laws. This includes protecting personal data and ensuring that it is processed in a secure and lawful manner.

### 6.7 Social Responsibility and Sustainability

- **Corporate Social Responsibility (CSR):** Suppliers should operate in a socially responsible manner, contributing positively to the communities in which they operate. This includes engaging in ethical labour practices, supporting local communities, and minimizing environmental impact.
- **Sustainable Practices:** Suppliers should adopt sustainable business practices that promote environmental stewardship. This includes reducing waste, conserving resources, and minimizing their carbon footprint.

By adhering to these ethical business practices, suppliers help Cundall maintain our reputation for integrity, fairness, and transparency. We are committed to working with suppliers

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who share our dedication to ethical conduct and to fostering long-term, mutually beneficial relationships.

# 7.0 Confidentiality and Data Protection

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*"Safeguarding confidential information and ensuring robust data protection are paramount to our operations. In an era where data breaches and cyber threats are increasingly prevalent,*

*maintaining the integrity and security of sensitive information is not just a legal requirement but a fundamental aspect of trust in our business relationships. By upholding the highest standards of confidentiality and data protection, we protect our clients, partners, and employees, and reinforce our commitment to ethical and responsible business practices. We expect our suppliers to share this commitment and work diligently to secure all data entrusted to them"*

#### **Carole O'Neil, Managing Partner**

At Cundall, we recognise the critical importance of protecting confidential information and ensuring data privacy. We expect our suppliers to share this commitment and to uphold the highest standards of confidentiality and data protection in their operations. The following principles outline our expectations for handling confidential information and personal data:

### **7.1 Protection of Confidential Information**

- **Safeguarding Information:** Suppliers must take all necessary measures to protect any confidential information received from Cundall against unauthorized access, use, disclosure, or loss. This includes implementing appropriate physical, technical, and administrative safeguards.
- **Use of Information:** Confidential information provided by Cundall should be used solely for the purposes specified in the relevant agreements or contracts. Suppliers must not use this information for any unauthorized purposes.
- **Non-Disclosure:** Suppliers must not disclose any confidential information to third parties without the prior written consent of Cundall. This includes information related to business operations, strategies, technologies, financial data, and any other proprietary information.
- **Retention and Disposal:** Suppliers must ensure that confidential information is retained only as long as necessary for legitimate business purposes and in accordance with applicable laws and regulations. When no longer needed, such information must be securely disposed of to prevent unauthorized access or retrieval.

### **7.2 Data Privacy Compliance**

- **Adherence to Data Protection Laws:** Suppliers must comply with all applicable data protection and privacy laws, including but not limited to the General Data Protection Regulation (GDPR) and any other relevant local or international regulations. This includes ensuring the lawful processing, storage, and transmission of personal data.
- **Personal Data Handling:** Suppliers must implement appropriate measures to protect personal data

against unauthorized access, use, alteration, or destruction. Personal data should be processed fairly and lawfully, and only for specified, explicit, and legitimate purposes.

- **Data Subject Rights:** Suppliers must respect the rights of data subjects, including the right to access, rectify, erase, or restrict the processing of their personal data. Suppliers must provide data subjects with clear information about how their data is being processed and ensure that any requests regarding their data are handled promptly and in accordance with applicable laws.
- **Data Breach Notification:** In the event of a data breach or any unauthorized access to confidential information, suppliers must notify Cundall immediately. Suppliers must cooperate fully with Cundall to investigate the breach, mitigate its effects, and prevent future occurrences.

## **7.3 Information Security Management**

- **Security Policies and Procedures:** Suppliers must establish and maintain robust information security policies and procedures to protect confidential information and personal data. These policies should cover areas such as access control, data encryption, network security, and incident response.
- **Employee Training and Awareness:** Suppliers must ensure that their employees are adequately trained on information security and data protection practices. Employees should be aware of their responsibilities and the importance of protecting confidential information.
- **Third-Party Management:** Suppliers must ensure that any third parties or subcontractors who process confidential information or personal data on their behalf adhere to the same data protection and confidentiality standards. This includes conducting due diligence and obtaining appropriate assurances from third parties.

By adhering to these confidentiality and data protection standards, suppliers help Cundall safeguard sensitive information and maintain trust with clients, employees, and other stakeholders. We are committed to working with suppliers who prioritise data security and uphold the highest standards of confidentiality.

# 8.0 Sustainability and Corporate Social Responsibility

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*"Sustainability and corporate social responsibility are at the heart of everything we do. We believe that our long-term success depends on our ability to create positive environmental and social impacts.*

*By prioritizing sustainable practices and ethical conduct, we not only protect our planet and support our communities but also drive innovation and resilience in our supply chain. Our commitment to sustainability and corporate social responsibility reflects our dedication to building a better future for all stakeholders. Together with our suppliers, we can lead the way towards a more sustainable and equitable world"*

#### **Carole O'Neil, Managing Partner**

At Cundall, sustainability and corporate social responsibility (CSR) are integral to our business ethos. We are committed to promoting sustainable practices and ethical behaviour throughout our supply chain. We expect our suppliers to share this commitment and to actively participate in creating a positive impact on the environment and society. The following principles outline our expectations for sustainability and CSR:

### **8.1 Environmental Stewardship**

- **Environmental Management:** Suppliers must implement effective environmental management systems to minimize their environmental impact. This includes compliance with environmental laws and regulations, as well as the adoption of recognised environmental certifications such as ISO 14001, Energy Star, and the Forest Stewardship Council (FSC).
- **Climate Action:** Suppliers must support our commitment to achieving net-zero greenhouse gas emissions by 2050. This involves measuring their carbon footprint and disclosing their carbon footprint Scope 1 and 2 emissions data, if requested by Cundall. Suppliers must setting targets for emissions reduction in line with the Standards of the Science-Based Targets initiative, and adopting renewable energy sources.
- **Waste Management and Circularity:** Suppliers must prioritise waste reduction, recycling, and circular economy principles. This includes minimising single-use plastics, implementing reuse initiatives, and ensuring products and packaging are designed for recyclability and biodegradability.
- **Sustainable Products:** Suppliers should strive to provide sustainable products that meet recognised ecolabel standards, such as EU Ecolabel, Nordic Swan, and Blue Angel. Life cycle assessments (LCA) should be conducted to evaluate the environmental impact of products from raw material extraction to end-of-life disposal.

### **8.2 Social Responsibility**

- **Human Rights and Fair Labour Practices:** Suppliers must respect and uphold human rights, ensuring fair labour practices and safe working conditions. This includes prohibiting forced labour, child labour, and

discrimination, and ensuring fair wages and reasonable working hours.

- **Diversity, Equity, and Inclusion (DE&I):** Suppliers must promote diversity, equity, and inclusion within their workforce. This includes developing a comprehensive DE&I policy, fostering a culture of non-discrimination, and providing equal opportunities for all employees.
- **Supplier Diversity:** We encourage suppliers to engage with diverse suppliers, including those owned by women, minorities, veterans, persons with disabilities, and LGBTQ+ individuals. This helps foster innovation, economic growth, and social impact.
- **Employee Empowerment:** Suppliers must support the freedom of association and the right to collective bargaining. Employees should feel empowered to participate in shaping their work lives and engage in professional associations and networks.

### **8.3 Ethical Supply Chain Management**

- **Due Diligence:** Suppliers must conduct thorough due diligence on their own suppliers to ensure alignment with human rights and ethical standards. This includes regular audits, assessments, and adherence to international guidelines such as the United Nations Guiding Principles (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidance.
- **Whistleblowing Mechanism:** Suppliers must implement robust whistleblowing mechanisms to allow employees and partners to report concerns regarding ethical misconduct or human rights violations. These mechanisms should be accessible, confidential, and protect whistleblowers from retaliation.

### **8.4 Governance and Transparency**

- **Anti-Corruption and Anti-Bribery:** Suppliers must adhere to a zero-tolerance approach towards corruption and bribery. Clear policies and procedures must be in place to prevent unethical behaviour and to ensure compliance with international anti-corruption standards.
- **Sustainability Reporting:** Suppliers are encouraged to develop and publish sustainability reports that detail their environmental and social performance. Transparency in sustainability efforts helps build trust and accountability and demonstrates a commitment to continuous improvement.
- **Diversity in Leadership:** Suppliers should prioritize diversity within their board and corporate leadership. A diverse leadership team brings varied perspectives and fosters better decision-making, innovation, and understanding of diverse markets and stakeholders.

By adhering to these sustainability and CSR principles, suppliers help Cundall create a more sustainable and equitable future. We are committed to working with suppliers who share our dedication to environmental stewardship and social responsibility, fostering long-term, mutually beneficial relationships.

# 9.0 Compliance and Reporting



*"Maintaining the highest standards of compliance and transparency is fundamental to our operations. Effective compliance and rigorous reporting practices are essential in safeguarding our integrity and*

*ensuring we meet the expectations of our clients, regulators, and communities. By fostering a culture of accountability and openness, we empower our suppliers to uphold these standards, enabling us to work together towards sustainable and ethical business practices. Commitment to compliance and reporting not only protects our reputation but also strengthens our ability to deliver exceptional value across the supply chain"*

#### **Carole O'Neil, Managing Partner**

At Cundall, we are committed to maintaining the highest standards of ethical conduct and legal compliance in all our operations. We expect our suppliers to share this commitment and to comply with all applicable laws, regulations, and standards. The following principles outline our expectations for compliance and reporting:

### 9.1 Adherence to Laws and Regulations

- **Legal Compliance:** Suppliers must comply with all applicable local, national, and international laws and regulations. This includes, but is not limited to, laws related to labour, health and safety, environmental protection, anti-corruption, and fair competition.
- **Regulatory Updates:** Suppliers are responsible for staying informed about changes in laws and regulations that may impact their operations. Regular updates and compliance checks should be conducted to ensure ongoing adherence.

### 9.2 Reporting and Accountability

- **Accurate Record Keeping:** Suppliers must maintain accurate and complete records of all business activities and transactions. These records should be available for review by Cundall upon request.
- **Incident Reporting:** Suppliers must report any violations of this Supplier Code of Conduct or applicable laws and regulations to Cundall immediately. This includes, but is not limited to, incidents related to pollution, hazardous waste management, working conditions, human rights violations, and unethical behaviour.
- **Whistleblowing Mechanisms:** Suppliers must establish formal policies and processes to protect employees who report conduct that they reasonably believe amounts to a violation of laws, regulations, or ethical standards. Employees should be able to report concerns without fear of retaliation.

### 9.3 Continuous Improvement and Monitoring

- **Self-Monitoring:** Suppliers are expected to regularly monitor their compliance with this Supplier Code of

Conduct and applicable laws. This includes conducting internal audits and assessments to identify and address any compliance gaps.

- **Corrective Actions:** When non-compliance is identified, suppliers must take immediate corrective actions to remedy the issue and prevent its recurrence. Suppliers should document these actions and report them to Cundall as part of their ongoing compliance efforts.
- **Engagement with Cundall:** Suppliers should engage in open and transparent communication with Cundall regarding their compliance status and any challenges they face. This includes participating in regular reviews and audits conducted by Cundall.

### 9.4 Responsible Supply Chain Management

- **ESG Standards:** Suppliers must integrate environmental, social, and governance (ESG) standards into their sourcing and procurement activities. This includes compliance with Cundall's Responsible Supply Chain Standard, which incorporates principles related to human rights, labour rights, and environmental stewardship.
- **Supplier Diversity:** Suppliers are encouraged to support diversity, equity, and inclusion within their own supply chains. This includes engaging with diverse suppliers and subcontractors to foster innovation and resilience.

### 9.5 Updates and Revisions

- **Periodic Updates:** This Supplier Code of Conduct will be periodically updated to reflect changes in laws, regulations, and Cundall's policies and standards. Suppliers are expected to stay informed about these updates and ensure their practices remain compliant.
- **Acceptance and Confirmation:** Suppliers must accept and confirm their compliance with this Supplier Code of Conduct as part of Cundall's onboarding process and before participating in any sourcing activities.

### 9.6 Resources and Support

- **Training and Education:** Suppliers are encouraged to provide training and education to their employees on compliance-related topics, including legal requirements, ethical conduct, and ESG principles.
- **Support and Guidance:** Cundall is committed to supporting its suppliers in achieving compliance. Suppliers can access resources and seek guidance from Cundall to help them understand and meet the requirements of this Supplier Code of Conduct.

By adhering to the above compliance and reporting standards, suppliers help Cundall maintain its commitment to ethical business practices and legal compliance. We are dedicated to working with suppliers who share our values and commitment to integrity, transparency, and continuous improvement.

# 10.0 Management Systems and Certifications

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*"The foundation of operational excellence and sustainability lies in robust management systems and recognised certifications. These elements not only ensure compliance with industry standards*

*but also drive continuous improvement and innovation across our supply chain. By partnering with suppliers who uphold these high standards, we can deliver superior value to our clients, protect the environment, and maintain the trust of our stakeholders. Together, we can achieve greater heights of quality, safety, and ethical business practices."*

#### **Carole O'Neil, Managing Partner**

At Cundall, we recognise that robust management systems and recognised certifications are crucial for maintaining high standards of quality, safety, environmental stewardship, and ethical business practices. We expect our suppliers to implement effective management systems and obtain relevant certifications to ensure continuous improvement and compliance with industry standards. The following principles outline our expectations for management systems and certifications:

### 10.1 Implementation of Management Systems

- **Quality Management:** Suppliers must implement and maintain a Quality Management System (QMS) that, where appropriate and proportionate to the size of the supplier's business, aligns with internationally recognised standards such as ISO 9001. The QMS should cover all aspects of the supplier's operations, ensuring consistent delivery of high-quality products and services.
- **Environmental Management:** Suppliers must establish an Environmental Management System (EMS) that, where appropriate and proportionate to the size of the supplier's business, is in line with ISO 14001 or equivalent standards. The EMS should focus on minimizing environmental impact, promoting sustainable practices, and ensuring compliance with environmental regulations.
- **Health and Safety Management:** Suppliers must adopt a Health and Safety Management System (HSMS) that, where appropriate and proportionate to the size of the supplier's business, complies with standards such as ISO 45001. The HSMS should aim to provide a safe and healthy workplace, prevent accidents, and ensure the wellbeing of employees.
- **Information Security Management:** Suppliers handling sensitive or confidential information must implement an Information Security Management System (ISMS) based on ISO 27001. The ISMS should protect data integrity, confidentiality, and availability, and ensure compliance with data protection laws.

### 10.2 Certification Requirements

- **Certification Maintenance:** Suppliers must obtain and maintain certifications relevant to their industry and operations. This demonstrates their commitment to

high standards and continuous improvement.

Relevant certifications may include, but are not limited to, ISO 9001, ISO 14001, ISO 45001, ISO 27001, and other industry-specific standards.

- **Periodic Audits:** Suppliers must undergo regular audits to ensure ongoing compliance with certification requirements. These audits should be conducted by accredited certification bodies, and any non-conformities identified must be addressed promptly.
- **Documentation and Records:** Suppliers must maintain accurate and up-to-date records of all certifications, audit reports, and corrective actions. These records should be available for review by Cundall upon request.

### 10.3 Continuous Improvement and Best Practices

- **Performance Monitoring:** Suppliers must regularly monitor and evaluate the performance of their management systems. This includes setting measurable objectives, tracking key performance indicators (KPIs), and conducting internal audits to identify areas for improvement.
- **Corrective and Preventive Actions:** Suppliers must establish processes for identifying, investigating, and addressing non-conformities and incidents. Corrective and preventive actions should be documented, implemented, and reviewed to prevent recurrence and improve overall performance.
- **Employee Training and Competence:** Suppliers must ensure that employees are adequately trained and competent to perform their duties in accordance with management system requirements. This includes providing regular training on quality, environmental, health and safety, and information security practices.

### 10.4 Supplier Evaluation and Development

- **Supplier Assessment:** Cundall may conduct evaluations and audits of suppliers to assess their compliance with management system standards and certifications. Suppliers are expected to cooperate fully with these assessments and provide all necessary documentation and access to facilities.
- **Capacity Building:** Cundall encourages suppliers to engage in capacity-building initiatives to enhance their management systems and achieve higher levels of performance. This includes participating in training programs, workshops, and industry forums to stay informed about best practices and emerging trends.

By implementing robust management systems and obtaining relevant certifications, suppliers demonstrate their commitment to excellence, sustainability, and continuous improvement. Cundall is dedicated to fostering long-term partnerships with suppliers who share our commitment to high standards and ethical business practices.

