

## **Walstead UK Supplier Code of Conduct.**

June 2026

### Contents

<b>Section 1 – Purpose</b> .....	1
<b>Section 2 – Scope</b> .....	1
<b>Section 3 – Business Ethics</b> .....	1
A: Compliance with Law .....	1
B: Bribery and Corruption .....	1
C: Conflicts of Interest .....	1
D: Gifts and Hospitality .....	1
E: Data Protection and Confidential Information .....	1
F: Intellectual Property .....	1
<b>Section 4 – Suppliers Labour and Human Rights</b> .....	2
A: Modern Slavery .....	2
B: Child Labour .....	2
C: Freedom of Association and Collective Bargaining .....	3
D: Remuneration and Benefits .....	3
E: Working Hours .....	3
F: Humane Treatment .....	3
G: Discrimination .....	3
<b>Section 5 – Health and Safety</b> .....	3
<b>Section 6 – Environmental Impact</b> .....	4
<b>Section 7 – Whistleblowing Policy</b> .....	4
<b>Section 8 – General Compliance</b> .....	4
<b>Section 9 – Suppliers Supply Chain</b> .....	4
<b>Section 10 – Auditing</b> .....	4
<b>Section 11 – Supplier Confirmation of Compliance</b> .....	<b>Error! Bookmark not defined.</b>

## Section 1 – Purpose

Walstead Group is committed to delivering high standards of social and environmental responsibility and ethical conduct. We have implemented this Supplier Code of Conduct to ensure high standards of social and environmental responsibility and ethical conduct is managed and monitored through our supply chain. This code of conduct sets out the standards we expect our suppliers to adhere to when conducting business with all Walstead Group companies.

## Section 2 – Scope

The Supplier Code of Conduct is applicable to all suppliers of goods, services, and labour. It is Walstead Groups expectation that all suppliers support our commitment to delivering the standards set out in this Code of Conduct by demonstrating compliance. Walstead Group's expectation is that our suppliers can demonstrate their own commitments and processes to ensure compliance within their organisations and within their own supply chains.

By agreeing to adhere to this Code of Conduct, suppliers commit to being able to demonstrate compliance on request. Walstead UK reserves the right to audit compliance. Walstead UK reserves the right to regularly ask suppliers to confirm adherence to this Supplier Code of Conduct or acceptance of any amendments made.

## Section 3 – Business Ethics

### A: Compliance with Law

Suppliers will ensure compliance with all applicable laws and regulations in the countries they operate and supply. Suppliers will also be compliant with any international laws and regulations.

### B: Bribery and Corruption

Walstead Group have a zero-tolerance approach to bribery and corruption. It is expected that suppliers have suitable processes in place to mitigate any form of bribery, corruption, embezzlement, or any other form of unethical trading within their organisation.

### C: Conflicts of Interest

Suppliers will proactively ensure there is no conflict of interest. In the event any conflict is identified it will be declared at the earliest opportunity with full details. Walstead Group and the supplier will ensure any conflict of interest is managed appropriately removing any form of risk during future trade.

### D: Gifts and Hospitality

Business gifts and hospitality must not be intended to influence, in any way, our business decisions. Walstead Group staff have policies in place to ensure staff declare business gifts and hospitality.

### E: Data Protection and Confidential Information.

Any information provided by Walstead Group, verbal or written, is to be considered as confidential information and must not be shared unless expressly permitted by us in writing. Suppliers will not share any information on competing businesses with Walstead Group employees.

### F: Intellectual Property

Any intellectual property must remain secure. Any transfer of intellectual property will be done with written approval and in accordance to intellectual property rights.

### G: Animal Testing

Suppliers must ensure that all products, materials, and processes comply with applicable laws and regulations regarding the ethical treatment of animals. The use of animal testing is strongly discouraged and should be

avoided whenever alternative methods are available. Suppliers are expected to prioritize scientifically validated non-animal testing methods, where feasible.

If animal testing is required by law, suppliers must ensure that such testing is conducted in accordance with internationally recognized standards, including the principles of the “3Rs” (Replacement, Reduction, and Refinement), to minimize harm and discomfort to animals.

Suppliers must maintain documentation of any animal testing conducted and provide it upon request as part of compliance reviews.

## Section 4 – Suppliers Labour and Human Rights

### A: Modern Slavery

Walstead Group is committed and fully compliant to the Modern Slavery Act 2015. We expect all suppliers, regardless of business type or size, to comply with the legislation to ensure we are all working to mitigate risk of modern slavery.

Walstead Group has zero tolerance to any form of involuntary labour. This includes forced labour, coerced labour, bonded labour, debt bondage, slavery, and trafficking.

Suppliers are expected to support Walstead Group’s commitment to the Modern Slavery Act 2015 and ensure processes and procedures are in place to mitigate risk within their own organisations and supply chain. Suppliers must ensure -

- Employees receive training on modern slavery and are aware of what action to take to report potential incidents.
- All work is on a voluntary basis, and employees maintain the right to end their employment contract with reasonable notice.
- Employment contracts and terms and conditions shall comply with local law and regulations. Employment contracts must clearly define workers terms and conditions and legal rights and will be presented in a language understood by the employee. Employment contracts should be in place prior to any employee commencing employment.
- Employees are not subject to recruitment fees or other expenses for their employment.
- Your organisation does not hold or refuse access to employees ID, Passport, immigration documentation or right to work documents.
- Unreasonable restrictions are placed on workers freedom of movement and communication at the workplace or at company provided accommodation. Workers must not be coerced, duped, misled, or held hostage.
- Workers are not isolated by controlling communication or by confiscating communication devices.

### B: Child Labour

Walstead Group have a zero-tolerance approach to child labour. Suppliers must ensure processes and procedures are in place to ensure child labour does not exist within their own organisation, regardless of countries they are operating in.

Child labour refers to any person under the minimum age for employment in the country they operate in. In countries where child labour law does not apply or is known for abuse, suppliers should operate best practice and work to European law and regulation.

All young worker protections must be adhered to, so that young workers under the age of 18 do not experience conditions in relation to their work that are mentally, physically, socially, or morally dangerous or harmful, or interfere with their education.

#### C: Freedom of Association and Collective Bargaining

Suppliers must adhere to employee's legal rights to Freedom of Association and Collective Bargaining.

Employees must be allowed to join trade unions, councils, committees or working groups at their discretion without any form of discrimination, intimidation, fear of punishment in any form or risk of dismissal.

#### D: Remuneration and Benefits

Suppliers must ensure workers receive wages and benefits that meet, at a minimum, relevant country laws and standards.

Suppliers must ensure employees receive equal pay and conditions for equal duties.

Suppliers must ensure workers are provided with a transparent pay statement that includes sufficient information to verify accurate pay for work completed. All deductions from pay should be itemised and clearly specified.

#### E: Working Hours

Regular working hours and overtime hours must comply with relevant country law. Suppliers must ensure employees working hours are monitored and consideration is given in respect of H&S and employees wellbeing.

Employees rest days must comply with relevant country law. When employees are on rest days workers should not be contacted or expected to communicate with the business unless an emergency arises that makes contact necessary.

All overtime requests should be put forward to employees on an optional basis. Employees should be clear that overtime is not mandatory and is worked at the employee's discretion.

#### F: Humane Treatment

All Employees must be treated with respect and dignity without exception.

Suppliers must ensure harsh and inhumane treatment including, sexual abuse, sexual harassment, mental abuse, physical abuse and verbal abuse do not exist within their organisation.

#### G: Discrimination

Suppliers must ensure their organisation is free from discrimination.

Suppliers must ensure there is no discrimination based on age, sex, marital or civil partnership status, ethnic status and nationality, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity/paternity/adoption leave status or disability.

Suppliers must ensure all employment decisions such as appointment, remuneration, employment TandC's, promotion opportunity or disciplinary action is based on the employee's ability, effectiveness, and performance. Decisions must be fair and made on a consistent basis ensuring there is no discrimination.

### Section 5 – Health and Safety

Suppliers will ensure compliance with all applicable Health and Safety laws and regulations

Walstead Group expect all suppliers maintain a safe and hygienic working environment to keep employees safe. Suppliers must ensure:

- Employees receive regular health and safety training.
- Processes and risk assessments are in place to prevent and minimise risk of accidents and injury in the workplace.
- Suitable PPE is always provided.

- First aiders are appointed and trained and have access to all necessary supplies and equipment in the event of an emergency.
- All equipment such as fire alarms, fire extinguishers, emergency lighting lifting equipment, MHE equipment and all other equipment is serviced appropriately and tested mitigating risk to employees.
- All other site equipment is serviced and tested as appropriate to mitigate risk to employees.
- Employees have access to drinking water and suitable places to consume food.
- Employees have access to suitable and clean toilet facilities.
- Where employees work remotely or on customers sites, suppliers must ensure employees are safe and working conditions are suitable.

## Section 6 – Environmental Impact

As a minimum, suppliers must comply with all applicable environmental regulatory requirements and implement reasonable measures and processes to mitigate any adverse impacts their products and services may have on the environment.

Suppliers must ensure –

- A carbon management plan is implemented to help to measure your carbon emissions, set objectives to reduce carbon emissions.
- Processes are implemented to monitor, optimise, and reduce consumption of energy and water.
- Optimise and reduce all waste streams produced.
- Ensure all waste materials, including hazardous waste, are segregated appropriately, and recycled correctly.
- Use sustainable packaging for goods produced and optimize usage where practical.
- Optimise transport services where possible and consider suppliers credentials as part of the supplier selection process. Encourage employees to use public transport and car share where practical and educate them on the benefits these actions have on the environment.
- When procuring new equipment evaluates energy efficiency and sustainability.
- When tendering goods and services, environmental and sustainability credentials form part of the evaluation and supplier selection process.

## Section 7 – Whistleblowing Policy

Suppliers must ensure a suitable whistleblowing policy is implemented giving employees clear and precise guidance and comfort on how to raise any non-compliance to subjects outlined in this code of conduct or any other matter. The policy should explain how concerns can be raised and the businesses commitment to investigate and take corrective action where necessary.

## Section 8 – General Compliance

Walstead Group expect our suppliers to comply with all applicable laws and regulations, in all countries in which they operate, service and supply.

## Section 9 – Suppliers Supply Chain

Walstead Group expect their suppliers to implement process and procedures to ensure their supply Chain are compliant to this code of conduct.

## Section 10 – Auditing

This code of conduct sets Walstead Group's expectation of its Supply Chains environmental responsibility and ethical conduct. Walstead Group require suppliers to sign this code of conduct to confirm compliance. Additional information will be requested to verify compliance to this code of conduct.