

# SUPPLIER CODE OF CONDUCT

Energia Group's supply chain is an essential component in the delivery of our strategy for sustainable growth and innovation. Having a supplier relationship based on trust and transparency is fundamental. 'Supplier' refers to all third-party organisations within the Group's supply chain which provide goods, works, services or utilities to the Group, for payment.

This supplier code of conduct supports the Group's Environmental, Social and Governance (ESG) commitments. It is underpinned by our core values; Trustworthy, Dynamic, Resourceful and Community Focused and informs our suppliers as to their role in respecting and embracing our values framework. The term 'required' indicates a minimum requirement, standard or action which must be fulfilled by a supplier. The term 'expected' indicates an objective which we want a supplier to actively progress. We may ask a supplier for evidence of fulfilment of requirements and expectations.

## Sustainable Procurement

Sustainability is key to how we do business today and how we will continue to do business into the future. It is a focus of our procurement practices throughout our supply chain. We use procurement to source goods, services, works and utilities in accordance with commercial practices based on fairness and transparency. We also use procurement to deliver our ESG commitments to source goods, services and works using a highly ethical approach.

Suppliers are expected to support the Group's sustainable procurement initiatives by responding positively to tenders, supplier engagement, collaboration requests and by promoting sustainable procurement in their own supply chain.

## Data Privacy

The Group handles large volumes of data. We are subject to a wide range of governmental legislation and regulation and are overseen by regulatory bodies at national and European level who are tasked with protecting the rights of data subjects. Compliance failures could damage our brand and reputation, and result in significant monetary fines.

The processing of personal data must comply with the EU & UK General Data Protection Regulation (GDPR). Suppliers are required to comply with GDPR and other applicable data protection and ePrivacy legislation, including in relation to their own supply chains.

## IT Security

Information security is a key priority for the Group. The processing of digital information must be managed in line with industry standards and security best practice.

Suppliers are required to have an appropriate level of technical and organisational security measures with controls in place to protect data at every stage of the supply chain process including network security to protect their systems against cyber-attacks and non cyber causes. Suppliers are required to comply with Group End User Policy where applicable and to inform Group immediately of any cyber-attacks or incidents which may compromise the Group's data.

## Social

The Group has a long-standing record of working in collaboration with community groups to enhance local areas and to benefit local people.

Suppliers are expected to contribute positively to the communities they serve by enhancing employment prospects and supporting local initiatives and local charitable causes.

## Health and Safety

The Group promotes the highest standards of health and safety compliance.

Suppliers are required to provide a safe working environment for all persons within their workforce. Suppliers are required to ensure the avoidance of or reduction in risks to health, safety and welfare through compliance with applicable legislation including the Health and Safety at Work Order (NI) 1978 and the Safety and Health and Welfare at Work Act 2005, the Group's health and safety policies, and any site instructions issued. Suppliers are required to cooperate with us to ensure compliance is achieved and demonstrated.

## Misconduct

The Group is committed to openness, honesty and accountability. Should a supplier have a concern of or suspect any misconduct in business they should contact the Group Procurement Manager by emailing [GroupProcurement@energiagroup.com](mailto:GroupProcurement@energiagroup.com).

## Modern Slavery and Human Trafficking

The Group prohibits all forms of modern slavery and human trafficking in any part of its business and in its supply chain. The Group is aligned with the [United Nations goal](#) to improve decent work and economic growth. Within this goal there is a commitment to take measures to eradicate forced labour and to end modern slavery and human trafficking.

Suppliers are required to have appropriate procedures in place to comply with the Group's Anti-Slavery and Human Trafficking Policy and all applicable law including the UK Modern Slavery Act 2015 and the Criminal Law (Human Trafficking) (Amendment) Act 2013.

## Ethics, Corruption and Financial Crime Prevention

The Group is committed to carrying on business in accordance with the highest ethical standards. This includes complying with all applicable trade sanctions regulations ('Sanctions Laws') in the countries in which we operate. The Group has a zero-tolerance policy to bribery, corruption, the facilitation of, or failure to prevent, tax evasion.

Suppliers are required to comply with all Sanctions laws. Suppliers are required to act in a professional manner with integrity and honesty and to comply with all applicable anti-bribery, anti-corruption and financial crime prevention legislation, including the UK Bribery Act 2010/Prevention of Corruption Act 1906, Criminal Finances Act 2017/ Criminal Justice (Corruption Offences) Act 2018. Suppliers are prohibited from offering bribes, kickbacks, or incentives to a member of the Group's workforce so as to gain an advantage.

## Diversity, Equity and Inclusion

The Group is committed to supporting diversity, equity and inclusion in the workplace. Suppliers are required to comply with all employment legislation and offer their employees fair employment contracts. Suppliers are expected to have a zero tolerance to harassment and discrimination and to consider diversity, equity and inclusion in their own decision making and supply chains.

## Environment and Biodiversity

Protecting our environment and the biodiversity that surrounds us is an important objective for the Group. We have environmental management systems certified to the ISO14001 global standard. The Group is committed to reducing the carbon intensity of the electricity we produce by 50% by 2030 (from base year 2019/20).

Suppliers are expected to actively seek to reduce their environmental impact and support Group in achieving compliance. Suppliers are required to comply with all applicable environmental laws, license obligations and industry standards.

## Conflicts of Interest

A conflict of interest exists when a financial, economic or personal interest could be perceived to compromise an individual's impartiality and independence in a procurement. Suppliers are required to disclose any conflicts of interest in any procurement exercise undertaken by the Group.

**energía group**