

Supplier Code of Conduct Policy

Version 1.2

Version Control

Version	Owner	Reviewer	Changes	Approval date	Next Review
1.0	Deleted User	Michael Walsh	Initial version or first version uploaded on portal - see ESG share for historical information	07/2021	03/2024
1.1	Ketevan Moseshvili	Justine Finance-Elzokm	Minor edit: update to former staff references.	03/2024	03/2025
1.2	Ketevan Moseshvili	Justine Finance-Elzokm	Annual Review	03/2025	03/2027

Purpose

We seek to reinforce our business integrity by striving to improve the service that we provide, making responsible decisions in how we manage the business, and actively managing the social and environmental impacts of what we do to help individuals, communities, businesses and economies progress and grow.

Our goal is to drive excellence in these areas throughout our own organisation, and to support and influence positively the development of these areas in our supply chain. Newable will always require that our suppliers comply with all applicable laws, regulations and standards within the geographies in which they operate.

For the avoidance of doubt, a “Supplier” means any firm or individual that provides a product or service to Newable or to any of its clients either directly or indirectly.

The standards outlined in this Supplier Code of Conduct will be periodically updated to reflect changes in laws, regulations and standards.

Policy

Environmental Management

Newable recognises that the management of environmental impacts is integral to good business practice, as is outlined in Newable's ESG Strategy. To support the reduction in our environmental impacts, we have set ambitious targets to 2035 to optimise inputs, reduce outputs and to be and advocate for sustainability. We encourage our suppliers to join us in similar environmental commitments by implementing Environmental Management Systems (EMS) as appropriate for their businesses, and aligning with best practice activities including the following:

Minimise harm to the environment

Establish operational practices through an EMS or similar framework which minimise impact on the environment and deploy measures to prevent and reduce harm to the environment. Impacts could include resource consumption, air emissions (including those contributing to climate change), water consumption, management of hazardous materials, recycling and waste production.

Assess business carbon footprint

Determine the greenhouse gas emissions generated annually from the business as a benchmark for reducing business carbon footprint from existing levels.

Optimise inputs

Consider opportunities for business efficiency gains leveraging energy efficiency solutions, low-carbon energy generation and purchase and by introducing new technologies that can replace manual paper intensive processes.

Reduce outputs

Align business with the 5R principles of: Refuse, Reduce, Reuse, Repurpose and Recycle. Decrease waste by ensuring that the majority of output is part of a circular economy rather than landfill.

Set environmental targets and timeframes

Maintain environmental policies, objectives and targets which as a minimum include commitments to identify, measure and reduce significant environmental impacts, identify business risks associated with climate change.

Track performance and report environmental improvements

Monitor and assess progress towards targets and commitments in order to promote continuous improvement.

Advocate for sustainability

Work with suppliers to improve sustainability performance throughout all activities, encouraging the pursuit of environmental accreditation and adoption of similar environmental practices.

Workforce and Human Rights

Newable supports the protection of human rights around the world. We comply with all applicable laws and regulations, including the UK Modern Slavery Act 2015.

We welcome relationships with our suppliers as opportunities to improve and evolve practices with respect to Human Rights. Our supply chain participants are expected to support our commitment to respect human rights through:

Occupational Health and Safety

Provision of a safe and hygienic working environment through proactive management and controls that minimise health and safety risks and support accident prevention for all personnel, bearing in mind the prevailing knowledge of the industry, the requirements of local health and safety laws and of any specific hazards, wherever personnel perform duties, such as, factories, warehouses, workshops, offices, vehicles, external facilities or other work, dining and recreational spaces.

Freely chosen employment

Ensuring that all work is completed voluntarily and without slavery, servitude, forced or compulsory labour and human trafficking. Workers shall have the freedom to terminate their employment at any time without penalty, upon giving reasonable notice.

Avoidance of child labour

Child labour should not be employed. The term 'child' refers to any person less than 15 years of age (or 14 where the law of the country permits), unless the minimum age for work or mandatory schooling is stipulated as being higher by local law, in which case the stipulated higher age applies in that locality.

Working hours

Ensuring that all workers are entitled to work and be paid for a minimum level of working hours; that working hours are not excessive; and that maximum working hours comply with national laws. All overtime shall be purely voluntary, unless part of a legally recognized collective bargaining agreement. No worker shall be made to work overtime under the threat of penalty, dismissal, denunciation to authorities or as a disciplinary measure.

Wages and benefits

Being responsible for employee compensation and payment of fair wages. All employees should be paid a fair wage commensurate with prevailing industry conditions or the minimum wage, whichever is higher.

Employee Freedom of Association

Respecting the rights of workers to exercise freedom of association and collective bargaining. Where the right of freedom of association and collective bargaining is restricted under law, the supplier will not hinder the development of alternative means for informing / consulting with employees.

Workforce Engagement

Newable believes that workforce engagement (sometimes referred to as “employee voice”) is an important element in delivering an engaged workforce which constantly drives improvement in business products, services and customer experience. Effective engagement mechanisms can also highlight shortcomings in the way an organisation treats its workforce.

Avoidance of discrimination and harassment

Promoting a workplace free from discrimination, harassment (sexual, physical, mental), victimisation, or any other form of inappropriate behaviour or abuse on any grounds (including; but not limited to age, disability, ethnic origin, gender, gender identity, nationality, marital status, parental status, physical appearance, political convictions, pregnancy, race, religious beliefs, sexual orientation, gender identity, social origin or status, economic status, union affiliation or employment status – salaried or hourly, full-time, part-time, seasonal, intern).

Grievances

Demonstration of formal mechanisms allowing employee grievances regarding human and labour rights violations to be properly filed, addressed and resolved without fear of perceived or actual retaliation. Grievance mechanisms shall be available in employee’s native language and include the ability to report grievances anonymously.

Whistleblowing

Demonstration of formal mechanisms allowing employees to raise concerns of operational or business practices that violate laws, regulations or company values and for the concerns to be properly filed, addressed and resolved without the fear of retaliation.

Diversity and Inclusion

Newable has a firm commitment to enable equality of opportunity and workplace cultures that promote workplace diversity and inclusion. We encourage our suppliers to partner with us to achieve excellence in equality, diversity and inclusion through:

Workplace Inclusion and development

Actively demonstrating commitment to equality, diversity and inclusion through all aspects of workplace operations and management giving clear consideration to equality of opportunity in employment, skill development and career advancement, particularly with under-represented segments of society in the area of local operations. Documenting a diversity and inclusion approach, which as a minimum should include commitments to identify, measure and improve a culture of inclusion for each of their stakeholder groups; with clear accountability and monitoring of progress across all levels of operations and management.

Inclusive supply chain management

Drive active management of downstream supply chains as part of their commitment so that the principles of diversity and inclusion are encouraged through their supply chain. As part of this active management we expect our suppliers to contribute to our supplier diversity and inclusion efforts by recruiting, utilising and developing diverse businesses on Newable's work. Diverse businesses are broadly defined as 'size diverse' i.e. small and medium-sized enterprises where revenue and/or employment eligibility limits are defined locally or 'ownership diverse' i.e. where socio-economic under-represented segments of society as defined by local/regional standards meet ownership, control and operating standards for communities such as women, ethnic minorities, LGBT and people with disabilities.

Society

Newable recognises the impact our procurement practices may have on local society. We encourage our suppliers to avoid decisions that may have a negative social or economic impact on society, including:

Local development

Demonstration of employee or corporate initiatives designed to improve the social and economic conditions of those within a local region. Avoidance of negative impacts resulting from activities considered detrimental to local communities.

Prompt payment of suppliers

Adherence to prompt payment legislation or standards to ensure the ongoing economic health of businesses contracted to provide goods and services in the supply chain.

Product, Service and Operational Responsibility

Newable has a firm commitment to deliver products and services that are responsibly sourced, produced and delivered to our customers and clients. Our supply chain partners are expected to support this commitment through:

Health and safety

Products and services are designed, produced and distributed in such a manner as to comply with laws, regulations and voluntary codes concerning health and safety impacts of products and services through their lifecycle. All products supplied to Newable must meet the minimum safety standards of the jurisdiction in which they will be supplied along with relevant safety information, where applicable.

Labelling

Products and services are designed, produced and distributed in such a manner as to comply with regulations and voluntary codes concerning information and labelling of products and services throughout their life cycle.

Avoidance of banned or disputed products and services

Demonstration of avoidance of the sale, use, marketing, and communications, including advertising, promotion and sponsorship, of banned or disputed products or services as defined by regulations and voluntary codes.

Raising a concern (whistleblowing)

Newable is committed to conducting all of its business activities ethically and in accordance with applicable laws and regulations, and the highest professional standards. Integrity in our business behaviour and in our management systems is crucial to the success of Newable as well as the fulfilment of our corporate responsibilities.

The Newable Whistleblowing policy reflects our commitment to ensuring that concerns of potential breaches of laws, rules, regulations or compliance policy raised in good faith are handled in an appropriate manner and rectified as necessary. Raising concerns and whistleblowing is the process through which you can report, in confidence, such potential breaches. This could mean fraud, criminal behaviour, ethical issues.

We expect our suppliers to strongly encourage their employees to raise concerns to Newable about inappropriate conduct by Newable or its employees. These concerns can be raised with the following contacts:

Whistleblowing Officer

Monica Whitefield
Telephone: 020 7940 1552
Mobile: 07803 524 450
monica.whitefield@newable.co.uk

Chief Executive Officer

Chris Manson
Telephone: 020 7940 1509
Mobile: 07896 753 499
chris.manson@newable.co.uk

Chair of the Board of Directors

Angus McLennan
Mobile: 07881 508010
angus@ang-mac.com

Newable's external auditors

S&W Partners Audit Ltd
Mark Bishop
Telephone: 020 4617 5157
Mobile: 07788 659 792
Mark.Bishop@swgroup.com

Independent whistleblowing charity

Protect
Telephone: 020 3117 2520
whistle@protect-advice.org.uk
<http://www.protect-advice.org.uk>

Monitoring and due diligence

Newable has a responsibility to conduct appropriate due diligence before entering relationships with key suppliers and has an established third-party assurance policy and process. This process will result in Newable's suppliers / contracting parties being contacted from time to time and asked to assist with a review process which will include reviewing and assessing compliance with this supplier code of conduct. This may include, but is not limited to:

- Reviewing copies of employment and health and safety policies.
- Undertaking due diligence with the aim of establishing that none of our suppliers have any association with modern slavery and that they have not been engaged in any activity with an adverse human rights impact.
- Assessing compliance with data security legislation including business continuity arrangements.
- Assessment of supplier's environmental policies and processes.

In addition, all suppliers are expected to self-monitor their compliance with our supplier code of conduct and to inform us of any non-compliance. Contact details include:

Chief Financial Officer

Robert Thompson
Telephone: +44 20 7940 1510
Rob.thompson@newable.co.uk

Chief ESG Officer

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Telephone: +44 20 7940 1525
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ESG & Sustainability Manager

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