

Chancerygate

Supplier code of conduct

Chancerygate Limited, including each of its affiliates and subsidiaries (collectively “CG”) is committed to acting ethically and with integrity in all of CG’s business dealings and relationships. As an industry leader and a responsible business, CG promotes the highest standards for ethics and business conduct, both within our business or in any of our supply chains. This Code sets out CG’s fundamental ethical and business conduct requirements for its suppliers. As a supplier of products and/or services to CG, your company (“Supplier”) is required to comply with this Supplier Code of Conduct (this “Code”).

Anti-Bribery and Corruption

Supplier will conduct its business in an honest and ethical manner. CG take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. Supplier will not (1) give or offer any payment, gift, hospitality or other benefit with the intent or effect of inducing anyone to provide an unfair business advantage, or in the expectation that an unfair business advantage will be received in return; (2) accept any offer from a third party that they know or suspect is made with the expectation of gaining an unfair business advantage; (3) give or offer any payment to a government official in any country to facilitate or speed up a routine or necessary procedure; (4) threaten or retaliate against anyone who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption. Supplier will comply with all Laws relating to anti-corruption, anti-money laundering, and the prevention of fraud and other financial crime (including tax evasion and its facilitation) in all of the countries in which the Supplier conducts business.

Confidentiality and Data Protection

Supplier will comply with all applicable data protection, privacy and information security Laws including, without limitation, such Laws pertaining to the information processed on behalf of CG, CG customers, CG employees or other suppliers, and shall not operate in a manner that causes CG to violate applicable data protection Laws. Supplier will properly protect the confidential, proprietary, and personal information it handles or otherwise processes by implementing appropriate measures to ensure a level of security appropriate to prevent unauthorised or unlawful loss, alteration or disclosure of information. Supplier will only engage other suppliers and subcontractors who ensure the same level of security. Supplier will, without undue delay, notify CG if it has experienced or reasonably suspects a data breach of any information handled or otherwise processed by Supplier in connection with or relating to CG, regardless of Supplier’s assessment of the impact or risk of such breach. Supplier will make available to CG all information reasonably requested to assist in the investigation and remediation of such breach and ensure compliance with all obligations under applicable Laws.

Anti-Slavery and Human Trafficking

Modern slavery is a criminal offence and a violation of fundamental human rights. Modern slavery can take many different forms, such as servitude, forced and compulsory labour, child labour or human trafficking. All have in common the deprivation of a person’s liberty in order to exploit them for personal or commercial gain. CG is committed to the implementation and enforcement of effective systems and controls aimed at ensuring that modern slavery is not taking part anywhere in our business or in any of our supply chains and to this end we will only work with organisations who also commit to the prevention of modern slavery. Supplier will comply with all applicable Laws in the countries in which they operate, and be committed to the value of, and respect for, all people. Supplier will have robust policies and procedures in place to minimise the risk of modern slavery and human trafficking occurring within their operations and their own supply chain, and will provide evidence on request. We expect that Supplier will hold their own suppliers to the same high standards.

Equal Opportunities, Anti-harassment and Bullying

CG is committed to encouraging equality, diversity and inclusion among our workforce and eliminating unlawful discrimination. Supplier will ensure that they promote equality and fairness for all in their employment, whether temporary, part-time or full-time, and are committed to providing a working environment free from harassment and bullying, ensuring all staff are treated, and treat others, with dignity and respect. Supplier will not permit unlawful discrimination or harassment of anyone based on their race, religion, gender, sexual orientation, gender identity, age, disability or other characteristics protected by Law. Supplier will ensure that it has requisite policies and practices in place to promote such equality, diversity, and inclusion and foster an environment free from unlawful discrimination, harassment or bullying.

Sexual Harassment

Chancerygate is committed to promoting an environment free from all forms of sexual harassment and takes a zero-tolerance approach to sexual harassment. Chancerygate is committed to dealing with cases of sexual harassment promptly, efficiently and sensitively in accordance with our Prevention of Sexual Harassment Policy. Suppliers should not subject their employees to any form of sexual harassment and must take reasonable steps to prevent sexual harassment of workers in the course of their employment.

Whistleblowing

Supplier will encourage openness and will support whistleblowers who raise genuine concerns, even if they turn out to be mistaken. Supplier will not threaten or retaliate against whistleblowers in any way and will provide staff with details of an independent third party to whom concerns can be raised.

Employment

Supplier will comply with all Laws relating to employment of its workforce, including in relation to wages and working hours. CG is committed to be an ethical employer that strives to improve labour standards, respects its employees' contributions and rewards them fairly. Supplier must share that commitment and we expect that Supplier will hold their own suppliers to the same high standards.

Health and Safety

Supplier will comply with all applicable health and safety Laws relating to its business operations. Supplier will limit the incidence of work-related injury and illness through the implementation of safe systems and work practices.

ESG

CG is committed to incorporating environmental, social and governance factors across all aspects of its business activities. Supplier will comply with all applicable environmental Laws and will seek opportunities that promote the efficient use of resources and energy, as well as clean and low energy solutions. Supplier commits to (1) decreasing the environmental impact of its operations by reducing energy consumption and related carbon emissions, water usage, responsibly managing waste disposal and facilitating access to green transportation; (2) maximising the positive social impact they have on their workforce by increasing health and well-being, raising welfare for local communities, providing fair conditions and promoting ethical behaviour; (3) actively addressing governance aspects of their daily operations to ensure their business is conducted in a responsible manner as well as complying with all applicable Laws.

Anti-tax evasion, Anti-money laundering and Sanctions

Chancerygate will not tolerate any involvement with, or facilitation of, tax evasion or money laundering. Suppliers are required to comply with all applicable anti-tax evasion and anti-money laundering laws and be transparent and co-operative in the provision of relevant information where requested.

Supplier will immediately disclose to CG any government sanction, embargo, or restriction in any jurisdiction applying to Supplier and/or any of its own supply chains.

General Terms

All references in this Code to "Laws" means all applicable laws, regulations, directives, rules, decrees, and governmental orders.

CG does not assume any duty to monitor or ensure compliance with this Code and Supplier

acknowledges and agrees that Supplier is solely responsible for full compliance with this Code. Supplier shall ensure that their directors, officers, employees, agents, representatives, suppliers, subcontractors, and other business partners understand, and comply with, the requirements set out in this Code. Supplier will promptly notify CG in writing of any known or suspected violation of this Code. Supplier shall promptly on request provide evidence of its compliance with this Code.

For questions or concerns about this Code, including its application to specific circumstances in connection with your organization's performance of work for CG, or to report any suspected violations of this Code, please contact Richard Bains or Eva Holden.

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