

K. LACEY (E & D) LTD SUPPLIER CODE OF CONDUCT POLICY		
Doc Ref : RA/SUPCODEDOC	Doc Title: Supplier Code of Conduct Policy	Applies to: SUPPLIERS TO K. LACEY LTD
Revision No: 2	Prepared By: ROS ANDREWS	Date Prepared: 18 th June 2025
Effective Date: 01/07/2025	Reviewed & Approved By: (Signature required)	Approval Date: 23/06/25
Distribution Date : 25/06/25	Ros Andrews <i>ROS ANDREWS</i> Stacey Robbins <i>STACEY ROBBINS</i> <small>STACEY ROBBINS (Jun 23, 2025 11:50 GMT+1)</small>	Next Review Date: 01/06/2025

POLICY : SUPPLIER CODE OF CONDUCT

REVIEW: ANNUALLY

PURPOSE : TO OUTLINE THE COMPANY PRINCIPLES THAT WE REQUIRE OUR SUPPLIERS TO ADHERE TO

SCOPE : ALL SUPPLIERS

POLICY STATEMENT

K. Lacey Ltd are committed to our organisation achieving a positive work environment based on the company's vision, principles and values to be effective, efficient, ethical, open and honest. To be polite and courteous with our colleagues and acquaintances both inside and outside our organisation and to conduct our business ethically and fairly. We expect the same from our suppliers.

This supplier code of conduct sets out the ethical principles that we require our suppliers to adhere to and to demand the same standards through their own supply chain.

In a situation when our policy conflicts with law then compliance with the law shall prevail.

HEALTH AND SAFETY

A safe working environment is a fundamental for employees to feel safe and perform well in the workplace. Compliance with internationally recognised standards must be maintained and training given to employees to provide adequate understanding and awareness.

EMPLOYMENT CONDITIONS

The supplier shall provide remuneration that meets any national legal standard on the minimum wage and ensure that working hours are not excessive and that employees are entitled to time off with pay. Employees are to be given terms and conditions by way of a written contract of employment.

INTEGRITY AND COMPLIANCE WITH LAW, RULES AND REGULATIONS

All suppliers shall be compliant with all applicable laws, government rules and regulations including laws governing procurement integrity through the supply chain in the countries that they operate or

trade in. Compliance with all current export/import controls and embargoes is expected throughout the supply chain.

ANTI-BRIBERY

Part of our company's ethical principles is to comply with anti-bribery standards including the UK Bribery Act 2010.

Our suppliers shall comply with the applicable laws and regulations governing bribery, corruption and fraud.

FAIR COMPETITION

The supplier shall not cause or be part of any breach of general or special competition regulations, participate in illegal price fixing, market or customer allocation, market sharing or bid rigging with competitors.

HUMAN RIGHTS, ANTI-SLAVERY AND HUMAN TRAFFICKING

We are committed to acting ethically in all our business dealings and as such request the same commitment from our suppliers and their supply chain.

The supplier shall not use child labour or forced or compulsory labour. The supplier will ensure that the working relationship between them and the employees is freely chosen and free from threats.

INFORMATION PROTECTION

Our company is committed to ensuring that our own and our customer/supplier's information is handled with discretion and protected from unauthorised use, access, destruction or disclosure to the full extent of the law and any contract requirements.

We require our suppliers to ensure that appropriate security measures are in place and regularly reviewed to protect sensitive data and classified information obtained in business activity and comply with the Data Protection, GDPR and Cyber Security Laws and regulations.

BEHAVIOUR TOWARDS OTHERS

We will always exhibit mutual respect for others, both at work and at work related functions and activities, this includes but is not limited to; colleagues, business acquaintances and contractors.

It is the duty of everyone to ensure that their behaviour at no time contributes toward the creation of an intimidating, offensive or hostile work relationship or environment.

We expect the same from our supply chain.

ENVIRONMENT

Suppliers must have at minimum an environmental policy in place but preferably be working toward or be certified to a recognised standard. (dependant on size of company).

We require all suppliers to be dedicated to responsible sourcing and be compliant with all regulatory laws and regulations relating to Conflict Minerals.

This policy shall be reviewed at least annually by a Director of the Company.









k. lacey (e & d) ltd SUPPLIER CODE OF CONDUCT POLICY

Final Audit Report

2025-06-25

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