



Supplier Ethical Code of Conduct

(Previously “Responsible Procurement Policy”)

Level 2 Procedure

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TELENT INTERNAL & EXTERNAL

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Table of Contents

1.	Introduction	3
2.	Strategic Sourcing Model	3
3.	Our Supply Chain Sustainability & Social Value Strategy	3
4.	Scope	4
5.	Policy	4
6.	Principles	4
7.	Human Rights & Labour Practices	7
8.	Equality, Diversity and Inclusion (ED&I)	9
9.	Health, Safety & Wellbeing	10
10.	Business Ethics	10
11.	Environment and Sustainability	12
12.	Social Value & Community Benefit	16
13.	ICT Equipment and Software Standards	18
14.	References	18
15.	Useful Contacts/Links	20
16.	Supporting Documents and Policies	20
17.	Document control	23

1. Introduction

Through Responsible Procurement, we can meet our needs for goods, services, works and utilities in a way that achieves value for money on a whole life basis. This is by generating benefits not only for our organisation, but also society and the economy, whilst minimising damage to the environment. This supplier code of conduct reflects Telent's values and commitment to responsible procurement, ethical sourcing and sustainability, which informs how we do business with our Suppliers, Subcontractors and Business Partners.

2. Strategic Sourcing Model

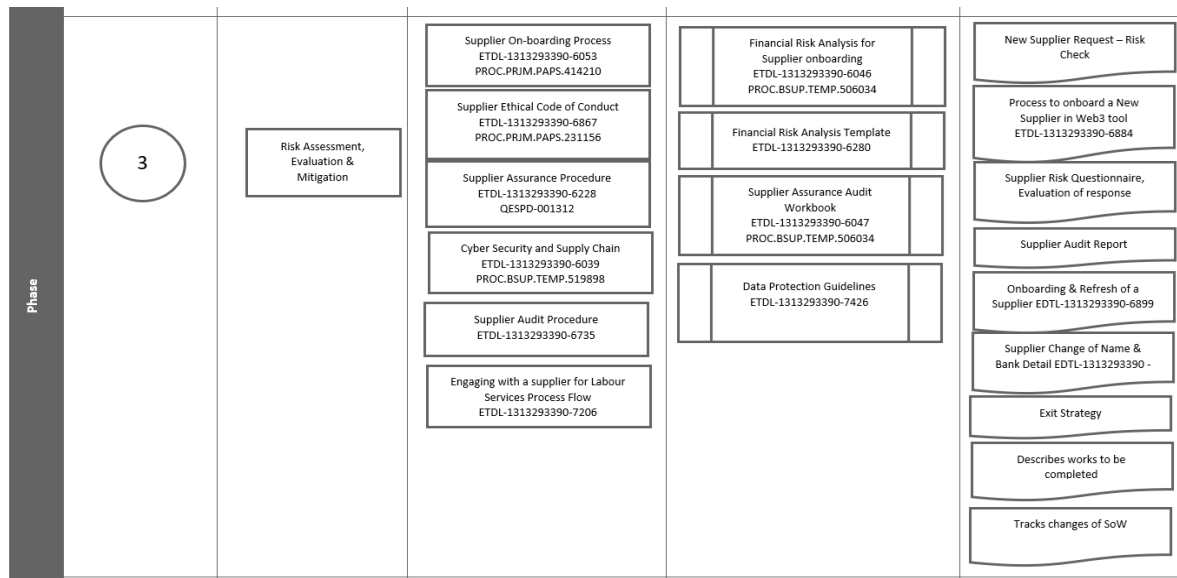
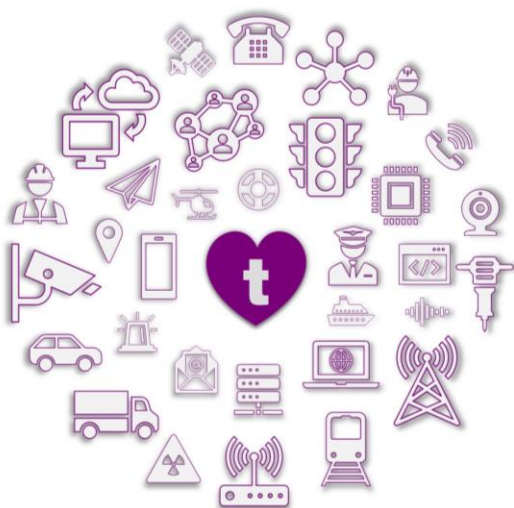


Figure 1 depicts the position of the Supplier Ethical Code of Conduct within the Strategic Sourcing Model

3. Our Supply Chain Sustainability & Social Value Strategy

We embed sustainability and social value considerations into all decision-making processes to maximise social, economic and environmental value through our supply chain. This includes key focusses and targets for development which also align to legislation, best practice and customer initiatives.



Our strategy is to achieve maximum value on a whole-life basis throughout our supply chain



Economic Value

Securing economic value not only for Telent but all our stakeholders and the communities we serve



Social Value

Adding community benefit through our supply chain, while ensuring regulation for human rights, labour and diversity is adhered to and that our ethical standards are upheld



Environmental Value

Working with suppliers to minimise any environmental impact of the goods, services and utilities that we purchase

4. Scope

The scope of this Code of Conduct extends to all stakeholders involved in our business relationships. This includes but is not limited to suppliers, vendors, contractors, and any other entities or individuals engaged in activities that impact our operations. The principles and expectations outlined apply to all parties associated with our organisation, reflecting our commitment to ethical, responsible, and sustainable business practices throughout our supply chain. To guarantee sustainability, cost-effectiveness, and operational efficiency, the execution of this code and its requirements are guided by spend thresholds, category risks and/or opportunities, as well as the specific contractual obligations in place.

5. Policy

This code of conduct specifies the minimum standards of conformance we expect from our supply chain and informs our tender specifications for Suppliers, Subcontractors and Business Partners, with full compliance being of major importance when awarding business. Compliance information is captured in Telent's onboarding process (ETDL-1313293390-6053) which includes benchmarking, pre-qualification and evaluation. Depending on predicted expenditure and perceived risk, new suppliers may be required to submit proof of compliance prior to commencement of business with Telent, such as copies of relevant accreditation or certification.

Telent is committed to working collaboratively with our Supply Chain to achieve or improve compliance with this and Telent's wider framework of management policies, including our Strategic Sourcing Model (ETDL-1313293390-6099) and Procurement Policy & Process (ETDL-1313293390-6865)

6. Principles

6.1 Our Company Values

This Code of Conduct is aligned with our corporate values, which support Telent's organisational culture and long-term vision to be the leading service partner, delivering outstanding capability and customer experience. For more information, visit: <https://telent.com/our-values>



Be Inclusive



Take Responsibility



Collaborate



Customer Focused

6.2 Transparency & Communication

Suppliers should communicate openly and transparently with Telent, providing accurate and timely information regarding their operations, practices, and potential risks. Our policies are provided to existing, new and potential Suppliers, Subcontractors and Business Partners. We work with our Supply Chain to communicate our approach, embed this code of conduct and exchange good practice. This is through a range of channels including the onboarding process, supplier review meetings, on-site audits, supplier bulletins, "Meet the Buyer" events and interactive training webinars.

6.3 Making a Difference

Telent is dedicated responsible procurement activities and strives to ensure that our supply chain aligns with relevant national and international legislation. This includes compliance with laws on anti-corruption,

anti-trust, anti-bribery, fair competition, and human rights. Consistent with our approach, suppliers are expected to:

- ✓ Utilise a risk-based methodology in implementing these standards
- ✓ Direct attention towards segments of their supply chain where the risk of not meeting these standards is highest and where the most significant impact can be achieved with available resources
- ✓ Be willing to disclose the basis of their approach to Telent and provide evidence demonstrating compliance with all applicable laws, as outlined in this policy

Our goal is to foster collaborative business relationships to generate maximum benefits for the communities in which we operate, the environment, and all stakeholders supporting our supply chain.

6.4 Reporting

We monitor our performance in relation to this policy through a range of qualitative and quantitative means. Details will be provided on request, and we require the same approach from our supply chain.

6.5 Awareness and Training

Suppliers should provide periodic training measures for all relevant stakeholders to understand and to comply with the contents of this policy, all applicable laws, regulations and generally recognised sustainability standards. We expect our suppliers to stay informed and compliant with evolving social, economic, and environmental regulations that may impact their operations. By proactively staying up to date on relevant legislation and standards, our suppliers contribute to the creation of a responsible and resilient supply chain.

To support this, we have dedicated a minimum of 100 hours per year of our Procurement team's resources to deliver a range of supplier development opportunities including training materials, guidance, practical support and the opportunity to share best practice. We hold interactive supplier webinars to facilitate peer collaboration on topics such as Equality, Diversity and Inclusion (EDI), Strategic Labour Needs & Training (SLNT), GDPR, Modern Slavery prevention, STEM Education, Carbon Reduction and Quality & Environmental Management Systems.

6.6 Monitoring and Independent Verification

The evaluation of these standards may involve monitoring and/or independent verification. Telent employs processes to proactively manage and monitor risks. The Supplier Onboarding Process (ETDL-1313293390-6053) assists Telent in gathering information for risk analysis and adopting a collaborative approach with suppliers, subcontractors, and business partners.

In alignment with these efforts, Telent:

- ✓ Assesses the compliance of suppliers, subcontractors, and business partners through onboarding, assurance audit, and performance management processes
- ✓ Collaborates with the supply chain in the event of identified under-performance and commits to a mutually agreed remediation plan
- ✓ Conducts on-site audits of suppliers, subcontractors, and business partners to ensure they meet Telent's standards, requirements, and expectations. This is to verify that they are capable of consistently supplying products or services that meet the Telent's quality, safety, regulatory, environmental and other criteria.

Suppliers are expected to:

- ✓ Provide Telent or its appointed representatives with reasonable access to all relevant information and premises, cooperating in any code of conduct assessment and encouraging their subcontractors to do the same

- ✓ Make reasonable efforts to establish a confidential means for their workers to report failures in observing these standards to the supplier
- ✓ If a supplier cannot provide confidential means for workers to report failures, they can utilise our confidential reporting service within their own policies, available at: <https://telent.com/speak-up>

6.7 Collaboration & Continuous Improvement

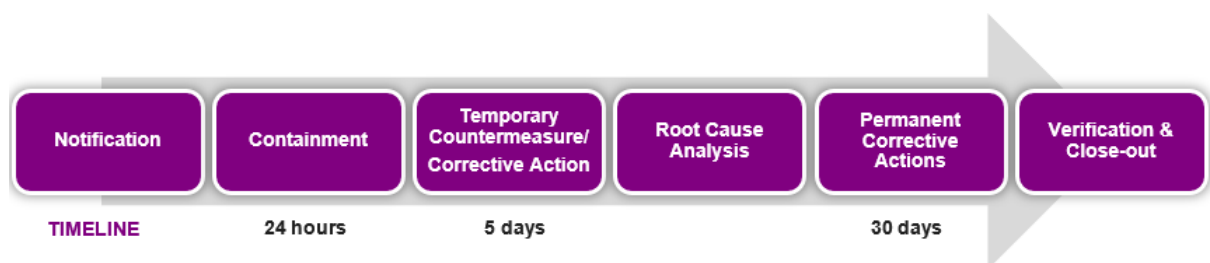
Collaboration is a fundamental principle of our supplier ethical code of conduct, emphasising the importance of working together to achieve common goals. It involves open communication, joint problem-solving, and shared commitment to ethical, sustainable, and responsible business practices. By fostering collaboration, we aim to build strong and mutually beneficial partnerships that contribute to the overall success of both parties while upholding high standards of integrity and social responsibility.

In adherence to our Supplier Collaboration Policy & Process (ETDL-131293390-6056), Telent actively collaborates with suppliers to:

- Encourage them to identify areas that may fall below these standards within their own operations or those of their subcontractors, with the aim of enhancing performance
- Regularly review and, where necessary, revise these principles
- Maintain a commitment not to impose a standard on a supplier that exceeds Telent's own policy on these issues
- Actively seek opportunities for collaboration within our industry, supply chain, customer base, and peer network to share best practices.

Should any non-conformance to this code of conduct be found, an 8D Supplier Corrective Action Request (SCAR) (ETDL-1313293390-6045) will be issued to the Supplier by Telent's Supplier Assurance team to:

- ✓ Summarise the concern and set targets for improvement
- ✓ Allow the sub-contractor to contain the problem
- ✓ Identify the root cause
- ✓ Implement effective permanent corrective and preventive action
- ✓ Improve the quality of performance through lessons learned



Integral to Telent's supplier management strategy, our Continuous Improvement Policy (ETDL-1313293390-6100) is designed to ensure compliance by proactively addressing issues and identifying opportunities for maximising value throughout the entire life cycle. We expect suppliers to embrace our continuous improvement approach to supplier corrective action requests (SCARs), which are always tailored to the unique circumstances of each case, in line with our documented quality management systems and accreditations.

Depending on severity, an immediate on-site audit may also be arranged. If responses are considered unacceptable, there is a pattern of non-conformance or a major breach occurs, the supplier's approval status may be suspended and lead to the business relationship being terminated.

7. Human Rights & Labour Practices

Telent suppliers are expected to support and respect the protection of human rights for employees and must treat all employees with dignity and respect. In addition to adhering to all relevant local and national laws, Telent's supply base must certify compliance with the [Ethical Trading Initiative \(ETI\) Base Code](#) standards in relation to their operation and that of their key suppliers.

7.1 Compliance with Modern Slavery Act (2015)

We maintain a zero-tolerance stance against slavery and human trafficking in our supply chains and business operations, which is clear in this Supplier Ethical Code of Conduct and our policies on Anti-Slavery (ETDL-1313293390-588) and Speak Up (ETDL-1313293390-955), all reflecting our ethical business relationships and robust systems to prevent slavery and human trafficking.

7.1.1 Due Diligence

Suppliers must comply with our Anti-Slavery Policy, outlined at <https://telent.com/about/compliance-statements>. To mitigate risks, we conduct thorough due diligence during supplier onboarding and regular evaluations, encompassing annual policy reviews, supply chain mapping, pre-qualification questionnaires, and ongoing assessments.

We enforce internal processes, conduct audits with a focus on slavery and human trafficking for high-risk suppliers, and actively encourage stakeholders to report any concerns through an anonymous mechanism at: <https://telent.com/speak-up>

7.1.2 Reporting

Suppliers must issue a statement reflecting their efforts, publish an annual modern slavery statement under the Modern Slavery Act (2015) if applicable, or sign a declaration of compliance with Telent's policy upon request. Suppliers should also provide a process to allow suspected concerns of slavery to be raised in a formal manner and can utilise our free and confidential third-party reporting service within their policies.

7.1.3 Non-conformance and collaboration

We routinely refresh compliance and in cases of violations, we collaborate with suppliers to implement corrective action plans as detailed in section 6.7 and, if necessary, invoke sanctions, including termination of the business relationship, to ensure adherence to our supplier code of conduct.

If you have any concerns about Modern Slavery that you need to discuss with Telent, please visit: <https://telent.com/speak-up> or for urgent advice, use the contacts listed in section 15.

7.2 Labour Practices

All suppliers must adhere to the following Ethical Trading Initiative (ETI) Base Code standards as a fundamental minimum requirement, which is verified through our onboarding process. The ETI Base Code defines essential principles encompassing labour standards, working conditions, and ethical business practices. Compliance with these standards is imperative to ensure that our supply chain operates ethically, respecting the rights and wellbeing of workers.

7.2.1 Employment is freely chosen

There is no forced, bonded or involuntary prison labour. Workers are not required to pay recruitment fees or lodge "deposits" such as passports or identity papers with their employer and are free to leave their employer after reasonable notice.

All workers shall be provided with written and understandable information about their employment conditions before they enter employment. They should also be given details of their wages for the pay period concerned each time that they are paid

7.2.2 Freedom of association and the right to collective bargaining are respected

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively and employers adopt an open attitude towards the activities of trade unions and their organisational activities. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining

7.2.3 Working conditions are safe and hygienic

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers

Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers. Responsibility for health and safety shall be assigned to a senior management representative

7.2.4 Child labour shall not be used

These policies and procedures conform to the provisions of the relevant ILO standards and accordingly, there shall be no occurrence or recruitment of child labour within our supply chain. Telent will develop, participate in and contribute to policies and programmes which support the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child. Additionally, children and young persons under 18 shall not be employed at night or in hazardous conditions.

7.2.5 Living wages are paid

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. Deductions from wages as a disciplinary measure shall not be permitted, nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

7.2.6 Working hours are not excessive

The guidance below is based international labour standards. In any event, working hours must comply with national laws, collective agreements and the provisions of this policy (whichever affords the greatest protection for workers).

Working hours, excluding overtime, shall be defined by contract and not exceed 48 hours per week and all overtime shall be voluntary. Overtime shall be used responsibly, considering all the following: the extent, frequency and hours worked by individual workers and the workforce overall. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by the clause below.

Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all the following are met:

- this is allowed by national law;

- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies

Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every fourteen-day period.

7.2.7 No discrimination is practiced

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

7.2.8 Regular employment is provided

To every extent possible, work performed must be based on a formal employment relationship established through national law and practice. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of off-payroll working (IR35) such as labour-only contracting, sub-contracting, home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

7.2.9 No harsh or inhumane treatment is allowed

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

8. Equality, Diversity and Inclusion (ED&I)

Telent's Equality, Diversity, and Inclusion (ED&I) Action Plan and policy (ETDL-1313293390-611) ensures that as an organisation, we not only prevent discrimination in all forms, but make people feel involved, respected, and connected and where the richness of perspectives and skills build a truly inclusive culture.

Being inclusive is one of our corporate Values and an integral part of how we work. Our policies aim to combat prejudice, stereotyping, and harassment, while promoting dignity and respect for the individual. This is embedded into our Procurement processes, and we therefore expect all suppliers we work with to align with our values and behaviours.

We also take an inclusive approach to procurement, by championing supplier diversity. This not only brings together the very best products, services and expertise, but can create economic value for disadvantaged communities. We are proud that the sub-contracting opportunities we provide to local businesses promote employment, economic growth and regional development.

We have committed to providing all UK businesses access to our supply chain through the principles of fair share, fair payment and fair terms. This is to enable maximum engagement with all types of organisations including Micro, Small & Medium Sized Enterprises (MSMEs) and the Voluntary, Community & Social Enterprise (VCSE) sector. Through defined KPIs as part of our Supply Chain Social Value Strategy, we measure our MSME engagement and publish this information annually at: www.telent.com/about-us/procurement.

Telent will:

- ✓ Continue to promote inclusive procurement and supplier diversity

- ✓ Use our influence as a buyer to improve diversity and equality standards within our supply chain through prudent selection, supplier development and education. To ensure this approach delivers tangible improvements, we may from time to time, request diversity monitoring data from our suppliers to assess progress and look for opportunities to improve practice
- ✓ Provide our suppliers access to a range of resources including training materials, guidance, and practical support to improve their performance

Telent suppliers should:

- ✓ Encourage equality, diversity and inclusion in their workplace for all types of employees
- ✓ Maintain a working environment free from bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued
- ✓ Work with us to report their diversity monitoring data if requested
- ✓ Look to measure and improve their engagement with MSMEs and VCSEs

8.1 Dignity at work

We advocate for the fundamental right of all individuals to a workplace and supply chain free from harassment, bullying, or victimisation. Our commitment to fostering a culture of respect extends to employees, customers, suppliers, and contractors. We insist that everyone associated with our organisation upholds these principles, recognising their role in creating a positive and inclusive environment. This commitment is not aspirational, but embedded in our organisational philosophy, ensuring consistent adherence to the highest standards of respect and dignity. We extend this expectation to external stakeholders, emphasising that these principles are integral to the success of our collaborative efforts.

9. Heath, Safety & Wellbeing

Telent promotes a positive culture of health, safety, and wellbeing within our supply chain, aligning with our corporate policies (ETDL-1313293390-6373) and Occupational Health & Safety Management Systems ISO45001:2018 accreditation. Suppliers must understand their Health, Safety and Wellbeing responsibility and proactively prevent work-related risks, creating a workplace that is safe, positive, and healthy, in line with our corporate policies.

Supplier performance in health and safety is a critical factor in our qualification process and is regularly audited on-site. Suppliers need effective management systems that match their business's nature and scope. Suppliers are responsible for ensuring that all subcontractors or third-party organisations they use to support Telent projects fully comply with health, safety, and wellbeing requirements. This is not just about following our corporate policies, but actively contributing to a secure and healthy work environment. Health and safety are non-negotiables in our partnership, and we expect suppliers to treat them with the same level of seriousness.

10. Business Ethics

Telent understands the importance of the way in which we engage and work with suppliers, subcontractors and business partners and that this behaviour is extended through the supply chain. We therefore set our expectations in the way in which suppliers and subcontractors shall behave and the way in which Telent shall engage suppliers.

10.1 Professional code of behaviour

In adherence to our supplier code of conduct, we expect all suppliers to uphold a professional code of behavior in all business interactions. This includes maintaining the highest standards of integrity, honesty, and transparency in their dealings. Suppliers should conduct themselves with professionalism, treating all

parties with respect and fairness. Any form of bribery, corruption, or unethical practices is strictly prohibited. Suppliers are also expected to comply with applicable laws and regulations and act responsibly to contribute positively to the business environment. By committing to a professional code of behavior, our suppliers play a crucial role in fostering a culture of trust and ethical business practices within our supply chain.

10.2 UK General Data Protection Regulation (UK GDPR)

All Telent employees shall maintain the highest possible standard of integrity in all their business relationships and reject any business practice, which might reasonably be deemed improper, and never use their authority for personal gain. All employees will ensure they optimise the use of resources to provide the maximum benefit to company and respect both with the letter and the spirit of contractual obligations.

Suppliers should:

- ✓ Process data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
- ✓ Maintain records of processing activities under their responsibility
- ✓ Not engage another processor without authorisation from Telent
- ✓ Make reasonable information available to Telent on request and allow for and contribute to audits, including inspections, conducted by Telent or another auditor mandated by Telent
- ✓ Inform Telent if, in their opinion, an instruction infringes UK GDPR
- ✓ Notify Telent without undue delay after becoming aware of a personal data breach
- ✓ Ensure data does not leave the UK with prior written consent

10.3 Tax evasion

Suppliers must never engage in facilitation of tax evasion, within the UK or abroad, when providing services to Telent. Suppliers must also comply with any procedures put in place by Telent to avoid facilitation of tax evasion and provide any associated information or assurances requested by Telent, from time to time.

10.4 Bribery and corruption

We are committed to conducting business with integrity and we do not accept any form of bribery or corruption, including embezzlement, money laundering, kickbacks, extortion and fraud. We also maintain a zero-tolerance approach to any reports of bribery and corruption within our supply chain. This is outlined in our policy on Policy on the Prevention, Detection and Investigation of Fraud and Corruption (ETDL-1313293390-7059)

10.5 Gifts and gratuities

We emphasise the importance of ethical business practices, particularly regarding gifts and gratuities. Suppliers are expected to refrain from offering, soliciting, or accepting gifts, favours, or any form of gratuities that may compromise or appear to compromise the integrity of business relationships. Any tokens of appreciation exchanged between parties should be modest, culturally appropriate, and in compliance with applicable laws and regulations. The purpose is to maintain a fair and level playing field, free from undue influence or conflicts of interest. By exercising caution in the acceptance and giving of gifts, our suppliers contribute to the preservation of a transparent and ethical business environment, reinforcing trust and credibility in our partnerships.

10.6 Conflict minerals

Suppliers who manufacture components, parts, or products containing tin, tantalum, tungsten and/or gold shall define, implement and communicate their own Conflict Mineral Policy with Telent, outlining their commitment to responsible sourcing, legal compliance and specific measures for the implementation of such policy.

Suppliers shall work with their own supply chain to ensure traceability of these metals to at least smelter level. Traceability data shall be maintained and recorded for up to 5 years and provided to Telent upon request. Once such mechanisms are available, suppliers shall ensure that purchased metals originate from smelters validated by Suppliers as being conflict mineral free. Suppliers are encouraged to support industry efforts to enhance traceability and responsible practices in global mineral supply chains.

10.7 Animal welfare

Telent and our Supply Chain should operate within appropriate animal welfare standards. We do not accept testing on animals.

10.8 Social Media

Suppliers are expected to approach social media with responsibility, integrity, and in alignment with our shared values. When representing our brand or collaborating on projects, suppliers should:

- Exercise caution and professionalism in their online interactions
- Refrain from engaging in offensive, discriminatory, or defamatory language
- Ensure confidential information including details of our business relationship are not disclosed through public platforms and obtain explicit permission before sharing any information
- Avoid creating misleading impressions about your relationship with us
- Refrain from making disparaging remarks about competitors, customers, or partners

Additionally, suppliers are encouraged to promote diversity, equity, and inclusion in their social media communications. Any concerns or issues related to our partnership should be addressed through appropriate channels rather than on public forums. By fostering a positive and respectful online presence, suppliers contribute to the collective success of our collaborative efforts.

10.9 Use of Telent Name and Logo

The use of Telent's logo is strictly prohibited without our prior consent. Suppliers must not engage with the media with reference to Telent without our prior approval. The use of Telent's logo on supplier websites or any other media is strictly prohibited without our prior consent. If permission was previously granted and business contracts have ceased, suppliers must promptly remove the Telent logo from websites or other media. Additionally, prior approval is necessary for incorporating links to Telent.com.

11. Environment and Sustainability

Telent are taking action to mitigate and adapt to climate change and aim to provide sustainable and effective solutions for our customers. We are committed to minimising our impact on the environment, continually improving our environmental performance through our policies (ETDL-1313293390-6043) accredited management systems including BS EN ISO14001:2015.

Telent has committed to matching the UK's climate target to deliver 'net zero' emissions by 2050 and the first important step is reducing our overall carbon footprint by 50%, no later than 2030. Importantly, this isn't just the carbon emissions that we create directly, but also indirectly within our entire value chain. 90% of our business's carbon emissions are embedded in the products and services that we purchase, and we are committed to working with our suppliers to implement various carbon reduction programmes to reduce the carbon footprint of our supply chain.

Through our current supply chain sustainability strategy, we work in collaboration with our suppliers to:

- Improve their carbon footprint through reporting, KPIs and target setting
- Substantially reduce waste through prevention, reduction, recycling & re-use (circular economy)
- Procure in-line with current best practice standards, technical and quality specifications, including Government Buying Standards
- Increase the share of renewable energy in our supply chain's fuel mix
- Reduce third-party vehicle emissions
- Reduce packaging and increase recycled content in packaging
- Work collaboratively to design innovative sustainable solutions

11.1 Environmental Policy

Suppliers are expected to establish and communicate a clear environmental policy that reflects their commitment to sustainability and environmental responsibility. The environmental policy should address key areas relevant to their business, including the key areas defined in section 9.

11.2 Compliance with Environmental Laws and Regulations

Suppliers must comply with all applicable local, national, and international environmental laws, regulations, and standards including, but not limited to:

11.2.1 Environmental Permits and Reporting

Compliance with all required environmental permits and reporting obligations.

11.2.2 Hazardous Materials

Proper handling, storage, transportation, and disposal of hazardous materials following relevant legislation. Suppliers should implement measures to prevent pollution including air, water, and soil pollution, resulting from their operations. The use of environmentally harmful substances should be minimised and alternatives that are less harmful to the environment should be explored.

11.2.3 Emissions Standards

Adherence to air and water emissions standards as mandated by local, national, and international regulatory bodies. Suppliers are encouraged and may be contracted to assess and disclose their carbon footprint and take steps to reduce greenhouse gas emissions within their operations and supply chain. Initiatives such as energy efficiency improvements, adoption of renewable energy sources and sustainable transportation practices should be considered.

11.2.4 Waste Management

Compliance with laws governing the proper handling, management, disposal and recycling of waste materials. Suppliers should adopt responsible waste management practices including the reduction, reuse, recycling, and safe disposal of waste generated in their operations. Efforts should be made to minimise the generation of hazardous waste and promote the use of environmentally friendly materials. Suppliers are encouraged and may be contracted to disclose their performance on a regular basis, including the weight and percentage of waste recycled, recovered and disposed of to landfill.

11.2.5 Protected Species and Habitats

Adherence to regulations protecting endangered species and their habitats in areas where operations are conducted. Suppliers should be aware of and take steps to minimise their impact on biodiversity and ecosystems, especially in areas where their operations are located. Collaboration with stakeholders to promote biodiversity conservation is encouraged.

11.2.6 Water Usage

Suppliers must comply with regulations governing water abstraction, discharge, and conservation. They are encouraged and may be contracted to disclose their usage and performance data on a regular basis.

11.2.7 Energy Efficiency

Adherence to laws promoting energy efficiency and reduction of greenhouse gas (GHG) emissions. Where applicable, suppliers must fulfill their responsibilities and comply with energy labelling regulations under the Energy Information (Amendment) Regulations 2018.

11.3 Resource Conservation

Suppliers should actively seek to minimise the use of natural resources including water, energy and raw materials, in their operations and supply chain processes. Implementation of efficient technologies and practices to reduce resource consumption is encouraged.

11.3.1 Timber

To avoid contributing to deforestation/degradation and to respect communities which rely on them, suppliers must be fully compliant with the European Union Timber Regulation (EUTR). Telent commits that our products will only use timber and paper obtained from known, legal and well-managed sources that are 100% recycled, or derived from sustainably managed forests approved by the Forest Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC).

11.3.2 Single-use plastics

Plastic waste is one of the greatest environmental challenges facing the world today. We are committed to tackling this problem by taking responsibility for our own impact on the environment and the communities in which we work. Telent will work towards minimising the use of single-use plastics across our operations and pro-actively work with our suppliers to find solutions which reduce unnecessary waste plastics.

Where practicable, Telent will:

- Request that suppliers minimise the use of single-use plastics in their service provision and find sustainable alternatives
- Encourage the use of recycled plastics (where the use of plastics is unavoidable)
- Support manufacturers that make products from locally sourced waste plastics

11.3.3 Packaging design

Our goal is to guarantee that the packaging we receive is made from sustainable materials. At a minimum, all packaging supplied by our partners must adhere to the Packaging (Essential Requirements) Regulations of 2015 and where practicable, we ask that any packaging we handle is:

>80% recyclable	Recyclable packaging must be designed so that a certain percentage of the materials used are recyclable
>80% suitable for energy recovery	Packaging designed to be disposed of through energy recovery (energy through burning materials) must contain at least 50% organic materials that burn (paper, wood, cardboard etc)
>80% biodegradable	Packaging designed for composting must be biodegradable
>80% re-usable	Reusable packaging must be designed so that it can be used several times. Once it has been reused, it must meet the requirements for recycling, energy recovery or composting

>30% recycled

All packaging including plastic components should be made from at least 30% recycled materials

All suppliers should be fully compliant with any obligations they have under the Plastic Packaging Tax (PPT) General Regulations 2022 if manufacturing, or importing into the UK, plastic packaging components that contain less than 30% recycled material. If requested by Telent, they should also provide us with:

- The total amount in weight and a breakdown by weight of the materials used to manufacture plastic packaging, excluding packaging which is used to transport imported goods (tertiary packaging)
- Data and calculations used to determine if a packaging component is, for the most part plastic, and how much recycled plastic it contains
- Weight of exempted plastic packaging and the reason for the exemption
- Amount in weight of plastic packaging exported, and allowed relief from the tax

11.4 Legislative Updates and Awareness

We expect suppliers to stay informed about legislative changes impacting their business and encourage open communication regarding changes that may impact the supplier's environmental practices. In our commitment to transparency and collaboration, we will share relevant information to support them in navigating and complying with evolving regulations.

11.5 Documentation and Records

Suppliers must keep accurate and up-to-date documentation demonstrating compliance with specific environmental legislation. Telent reserves the right to request and review relevant documentation to ensure compliance.

11.6 Collaboration on Legislative Compliance

Suppliers are encouraged to collaborate with the Telent to address challenges related to legislative compliance. In cases where legislative changes may affect the supplier's ability to comply, proactive communication with the company is essential for finding mutually beneficial solutions.

11.7 Continuous Improvement

Suppliers are expected to continuously evaluate and improve their environmental performance through regular assessments, setting targets and implementing best practices. Collaboration with the company to identify opportunities for joint environmental improvement initiatives is encouraged and welcomed.

11.8 Reporting and Transparency

Suppliers are expected to maintain transparency regarding their environmental performance by providing environmental performance data upon request and engaging in reporting initiatives that support industry sustainability objectives. We encourage collaboration with Telent in disclosing relevant environmental metrics and goals. Additionally, suppliers may be contracted to supply specific environmental performance data to Telent, and we are committed to supporting them to meet these requirements.

11.9 Non-Compliance and Remediation

Failure to comply with this environmental management and sustainability conduct may result in corrective action requests, including but not limited to the development and implementation of corrective action plans as defined in section 6.7. Suppliers are expected to promptly address and remedy any environmental non-compliance issues.

11.10 Government Buying Standards (GBS)

Where practicable, we follow the Government Buying Standards (GBS) and encourage our supply partners to do the same. The GBS are a set of product specifications outlined by the Department for Environment, Food and Rural Affairs (Defra) to ensure easy selection of the most sustainable products in a range of categories including:

- Cleaning Products
- Construction
- Electrical Goods
- Furniture
- Gardening Services
- Office ICT equipment
- Paper
- Textiles
- Transport

The standards go beyond the minimum requirements of legislation and aim to reduce environmental impacts in some key life cycle stages, thus enabling purchasers to achieve value-for-money and influence the supply chain. The standards are mandatory for central government departments and related organisations, though any organisation concerned about sustainable procurement may choose to follow them or to specify them in tenders.

12. Social Value & Community Benefit

The creation of social value is an integral part of our supply chain sustainability strategy and corporate policies (ETDL-1313293390-6282). Telent actively provide local employment, endorse diversity and maintain equality of opportunities for all through the principles of Fair Share, Fair Payment and Fair Terms - and we expect our suppliers to uphold these values.

12.1 Fair Share

Telent is committed to promoting diversity and inclusion within its supply chain, striving to provide equal opportunities for suppliers of all types, including micro, small and medium enterprises (MSMEs), minority-owned businesses, women-owned businesses, and other underrepresented groups. We operate a category management approach to Procurement, based on whole-market consideration and supplier relationship management.

We uphold the principles of equal treatment, non-discrimination, proportionality and transparency to promote supplier diversity and expect our suppliers to align. This includes considering small and diverse supplier for your procurement opportunities.

12.1.1 MSME Engagement Data

On an annual basis, we publish our MSME engagement data to report our spend with minority businesses. From time-to-time, we may also request this information from our suppliers and commit to supporting them should they not currently capture the information.

12.2 Fair Payment

Telent is committed to fair and transparent payment practices, ensuring that suppliers are paid accurately and in a timely manner. Payment terms, including invoicing, will be clearly communicated between parties and agreed upon in writing. We also expect our suppliers to uphold these standards in their supplier agreements.

12.2.1 Payment Terms and Conditions

Payment terms should be fair and reasonable, taking into consideration industry standards, the nature of the products or services provided and the mutual agreement between the company and the supplier. Generally, Telent flows-down our customer payment to our supplier contracts but encourages negotiation that supports the financial health of both parties, promoting a sustainable and collaborative business relationship. We expect our suppliers to follow these principles in their supply chains.

12.2.2 Invoice Accuracy and Approval

Suppliers are responsible for submitting accurate and complete invoices in accordance with the agreed-upon terms and conditions. Telent commits to promptly review and approve invoices, resolving any discrepancies or issues in a timely manner. To provide clarity on invoicing requirements, we have published a “How to Get Paid” guide on our website at www.telent.com and our suppliers should make requirements clear to theirs.

12.2.3 Communication on Payment Delays

If unforeseen circumstances cause payment delays, Telent undertakes to communicate promptly with the supplier, providing an explanation for the delay and working towards a resolution. Suppliers are encouraged to notify Telent in advance if they anticipate any challenges meeting their contractual obligations, including delivery timelines as this will delay payment.

12.2.4 Prohibition of Unfair Payment Practices

Telent prohibits any unfair payment practices, including but not limited to late payments, unjustified payment deductions, and unilateral changes to agreed-upon payment terms. Suppliers are encouraged to report any concerns regarding unfair payment practices to the designated contact within the company. Suppliers should also uphold these standards within their own supplier dealings.

12.2.5 Dispute resolution

Disputes related to payment terms should be resolved amicably through open communication and negotiation. If disputes cannot be resolved through direct negotiation, both parties agree to explore alternative dispute resolution mechanisms, such as mediation or arbitration.

12.2.6 Non-retaliation

Telent guarantees that suppliers will not face retaliation for raising legitimate concerns or disputes related to payment terms. Suppliers are encouraged to report any instances of perceived retaliation to the designated contact within the company.

12.3 Fair Terms

Telent are committed to equitable business relationships. Our expectations and contract requirements are fair, balanced and reflect individual scopes of work. We are also committed to process simplicity to reduce disproportionate administration. Where possible, we continue to break down packages of work to provide as many local subcontracting opportunities as we can and encourage our suppliers to adopt this approach.

12.4 Shared Commitment to Social Value creation

Suppliers are expected to share Telent's commitment to creating positive social impact and contributing to the wellbeing of communities. Both parties acknowledge the role of businesses in society and commit to working together to enhance social value through ethical business practices. In addition to compliance with all social and ethical requirements as outlined in this code of conduct, we also encourage:

12.4.1 Collaborative Initiatives

Suppliers are encouraged to collaborate with Telent on initiatives that enhance social value, such as community development projects, education and training programs, and other activities that positively impact society. Joint efforts may include identifying opportunities to support local employment, providing training and skill development, and contributing to charitable causes aligned with social responsibility goals.

12.4.2 Social Impact Reporting

Suppliers are encouraged to report on their social impact initiatives, including metrics related to labour practices, diversity, community engagement, and ethical sourcing. Telent will collaborate with suppliers to

establish reporting mechanisms that contribute to the ongoing improvement of social responsibility practices.

13. ICT Equipment and Software Standards

Suppliers must follow all applicable laws and regulations related to the procurement, use, and disposal of ICT equipment and software. Suppliers are expected to stay informed about changes in relevant legislation and promptly adapt their practices to remain compliant. This includes:

13.1 Ethical Sourcing of ICT Equipment

Where applicable, Suppliers must ensure that the ICT equipment they provide is ethically sourced, free from conflict minerals, and follows international standards for responsible sourcing. Efforts should be made to prioritise suppliers that demonstrate a commitment to ethical and sustainable practices in the production of ICT equipment.

13.2 Data Security and Privacy

Suppliers must manage data security and privacy in the development and deployment of ICT equipment and software. Measures should be in place to protect sensitive information from unauthorised access, and compliance with data protection laws must be maintained. Suppliers must implement robust cybersecurity measures to protect ICT systems from potential cyber threats and attacks. Regular security assessments and updates should be conducted to address vulnerabilities and enhance the resilience of ICT systems.

13.3 Software Licensing and Intellectual Property

Suppliers must adhere to legal and ethical standards on software licensing, respecting intellectual property rights and ensuring compliance with relevant licensing agreements. The use of pirated or unauthorised software is strictly prohibited.

13.4 Prohibition of Grey Market Products

Suppliers must strictly refrain from engaging in the distribution, sale, or incorporation of grey market products into our supply chain. Grey market products, often sourced from unauthorised channels, can compromise the integrity of our brand and pose risks to customers. Suppliers are expected to source products directly from authorised distributors and ensure the legitimacy and authenticity of all goods provided to Telent.

13.5 Environmental Impact

Suppliers are encouraged to consider the environmental impact of ICT equipment throughout its lifecycle, from manufacturing to disposal. Efforts should be made to minimise electronic waste through responsible disposal and recycling practices. All equipment and software should in-line with EU Energy Efficiency Directive principles and ideally, Government Buying Standards for electrical goods and ICT equipment.

14. References

The following international standards underpin the Labour Rights Standards and will be used as the primary reference points when implementing the Standards with our suppliers:

The United Nations Universal Declaration of Human Rights

This sets “a common standard of achievement for all peoples and all nations” and represents a set of core international ethical standards.

The United Nations Convention on the Rights of the Child

This has been ratified by almost every member state in the United Nations and provides a framework for interpreting the best interests of the child.

The Conventions of the International Labour Organisation

The ILO incorporates government, employer and employee representatives and is responsible for setting international labour standards. The ILO Conventions have the force of international law and are binding for states that have ratified them.

The ILO Declaration on Fundamental Principles and Rights at Work

All 174 ILO member states must respect, promote and realise the principles contained in the seven core ILO Conventions, regardless of ratification. These are:

- Conventions 29 and 105 & Recommendation 35 (Forced and Bonded Labour)
- Convention 87 (Freedom of Association)
- Convention 98 (Right to Organise and Collective Bargaining)
- Conventions 100 and 111, recommendations 90 and 111 (Equal Remuneration for male and female workers for work of equal value; Discrimination in employment and occupation)
- Convention 138 & Recommendation 146 (Minimum Age)

Although not core ILO conventions, the following ILO standards are especially relevant to the standards of this code:

- Convention 135 & Recommendation 143 (Workers' Representatives Convention)
- Convention 155 & Recommendation 164 (Occupational Safety & Health)
- Convention 159 & Recommendation 168 (Vocation Rehabilitation)
- Convention 177 & Recommendation 184 (Home Work)

The following definitions shall apply to the Child Labour section:

“Child”

Any person less than 15 years of age unless local minimum age law stipulate a higher age for work or mandatory schooling, in which case the higher age shall apply. If local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention 138, the lower will apply.

“Young Person”

Any worker over the age of a child as defined above and under the age of 18

“Child Labour”

Any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

“At Night”

The following text is taken from ILO Convention 90. Please note that there are various exceptions to these provisions contained within the convention. For this Convention, the term “night” signifies a period of at least twelve consecutive hours. In the case of young persons under sixteen years of age, this period shall

include the interval between ten o'clock in the evening and six o'clock in the morning. In the case of young persons who have attained the age of sixteen years but are under the age of eighteen years, this period shall include an interval prescribed by the competent authority of at least seven consecutive hours falling between ten o'clock in the evening and seven o'clock in the morning; the competent authority may prescribe different intervals for different areas, industries, undertakings or branches of industries or undertakings, but shall consult the employers' and workers' organisations concerned before prescribing an interval beginning after eleven o'clock in the evening.

15. Useful Contacts/Links

Issue	Link/Contact	Detail
Access to trade unions/representation	Web: www.global-unions.org	Information regarding global trade unions that individuals may wish to engage. Global Unions is the partnership between the International Trade Union Confederation, Global Union Federations and the Trade Union Advisory Committee to the OECD
Modern Slavery	Web: www.modernslaveryhelpline.org Tel: +44 (0)8000 121 700	The Modern Slavery Helpline is a unique one-stop contact for everything from general enquiries to reporting actual or suspected abuse and receiving guidance

16. Supporting Documents and Policies

16.1 Telent Policies and Procedures

Copies of documents can be provided on request. Please contact procurement@telent.com

Title	Document Reference Number
Procurement Policy & Process	ETDL-1313293390-6865
Strategic Sourcing Model	ETDL-1313293390-6099
Supplier Corrective Action Process	ETDL-1313293390-6045
Supplier Onboarding Process	ETDL-1313293390-6053
Supplier Audit Procedure	ETDL-1313293390-6735
Supplier Performance Management Procedure	ETDL-1313293390-7509
Supplier Continuous Improvement Policy	ETDL-1313293390-6100
Supplier Collaboration Policy & Process	ETDL-1313293390-6056
Cyber Security in the Supply Chain	ETDL-1313293390-6039
Equality, Diversity & Inclusion Policy	ETDL-1313293390-611
Quality Management System Policy	ETDL-1313293390-6044
Environment & Sustainability Policy	ETDL-1313293390-6043
Social Value Policy	ETDL-1313293390-6282

Business Continuity Management Policy	ETDL-1313293390-6689
Health, Safety & Welfare Policy	ETDL-1313293390-6373
Information Security Policy	ETDL-1313293390-33
Collaborative Business Relationship Policy	ETDL-1313293390-7234
Bribery, Corruption and Tax Evasion Policy	ETDL-1313293390-397
Anti-Slavery Policy	ETDL-1313293390-588
Speak Up Policy	ETDL-1313293390-955
Policy on the Prevention, Detection and Investigation of Fraud and Corruption	ETDL-1313293390-7059
Data Protection Procedures	ETDL-1313293390-7324

16.2 Our Accreditations

Telent is certified against the requirements of the following ISO standards:

IT Service Management System ISO/IEC 20000-1:2011
 Quality Management Systems ISO9001:2015
 Environmental Management ISO14001:2015
 Occupational Health & Safety Management Systems ISO45001:2018
 Information Security Management Systems ISO/IEC 27001:2013
 National Highways Sector Scheme ISO9001:2008 NHSS Sector 8

16.3 Industry Specific Standards

Telent is certified against the requirements of the following industry specific standards:

Contractors Health and Safety Assessment Scheme (CHAS)
 Qualified supplier under the Network Rail LinkUp scheme
 Certified by Network Rail as a PC Licence holder
 SMAS Worksafe Contractor
 ConstructionLine
 Safe contractor scheme
 Highways Agency HERS and HEA schemes
 NICEIC
 FORS Bronze and Silver Certificate from Transport for London
 Formally licensed assessor under the Institute of Railway Signalling Engineers (IRSE)
 Achilles Rail RISQS - 3-star status
 Achilles UVDB
 Safety Organisations
 British Safety Council Membership
 RoSPA
 WEEE Compliance
 Waste Carriers
 Cyber Essentials PLUS
 NSI Electronic Security Systems - NACOSS GOLD – CCTV & Access Control
 Supplement to NSI Certificate of Approval

16.4 Key Legislation, Frameworks and Initiatives

Name	External Link
Modern Slavery Act 2015	www.legislation.gov.uk
Bribery Act 2010	
Fraud Act 2006	
UK Labour Law	
Public Services (Social Value Act) 2012	
Equality Act 2010	
Batteries and Accumulators (Placing on the Market) (Amendment) Regulations 2015	
Energy Savings Opportunity Scheme (ESOS)	www.gov.uk
Streamlined Energy and Carbon Reporting (SECR)	
Government Buying Standards	
The Packaging (Essential Requirements) Regulations 2015	
Plastic Packaging Tax (PPT) General Regulation 2022	
Waste Reporting	
Waste Electrical & Electronic Equipment Directive (WEEE)	
RoHS Directive	
EU Parliament Ban on Single Use Plastics (2021)	
Fleet Operator Recognition Scheme (FORS)	www.fors-online.org.uk
Ethical Trade Initiative (ETI) Base Code	www.ethicaltrade.org
Carbon Disclosure Project (CDP)	www.cdp.net
UK General Data Protection Regulation (UK GDPR)	www.ico.org.uk

17. Document control

17.1 Maintenance and Distribution

This document is approved and held in Everything Telent, and the described process are subject to formal change and control procedures as required by the Quality Management System (QMS).

17.2 Amendment History

Issue	Date	Change Description	Author
1a	Oct-11	Responsible Procurement Policy updated. Formatting and typos and document references updated.	P. Lancaster
2a	Apr-12	Updated version to align with footer	P. Lancaster
2b	Apr-12	Minor formatting update. Aligned issue number in footer and document title	P. Lancaster
3a	May-14	Updated to incorporate ETI Base Code.	P. Lancaster
4a	Jun-16	Update to Responsible Procurement Policy	H. Jarvis
4b	Jun-16	Changed font of 4.6 & 4.7 to match other headers	H. Jarvis
5a	Jul-16	Up-issued to 5 but 5 was not released so need to go to version 6	H. Jarvis
6a	Jul-16	Update to include Modern Slavery Act	H. Jarvis
6b	Feb-17	Issue to 007	H. Jarvis
7a	Feb-17	Version 7 to update	H. Jarvis
8a	Feb-17	Update to version 8 citing new NSRR, PQQ PROCESS doc number	H. Jarvis
9a	Jun-17	New version to include data protection	H. Jarvis
10a	Oct-18	Updated by Catherine Watkins July 2018	J. Milnes
11a	Apr-19	Reviewing document	C. Watkins
12a	Oct-19	Re-formatted layout (including all margins and headings)	R. Griffiths
13a	Jan-20	Re-draft of all sections in-line with Sustainability Strategy plus new sections 1, 2, 6.11, 8.5-7, 9, 11, 12, 13	R. Griffiths
0.1	Feb-20	Migration and SharePoint System Development	R. Kerr
14	July-20	Documents formatted to standardise all process documents	R. Kerr
15	July 21	Review and minor update	H Jarvis
16	Oct 21	Minor updates to company name format and references to latest data protection legislation	R. Griffiths
17	Feb 22	Updated to reflect legislative changes to PPT and additional provisions under labour standards	R. Griffiths
18	Aug 22	Updated references	R. Griffiths
19	Jan 23	Included references to new corporate ED&I strategy	R. Griffiths
20	Jan 24	Significant update to incorporate new guidance on social, economic and environmental matters in-line with Telent policies. This includes renaming from "Responsible Procurement Policy" to "Supplier Ethical Code of Conduct".	R. Griffiths