



Function: Procurement
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Purpose: To outline supplier requirements in delivering sustainability and strategic commitments.
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Approver: Tim Pullen

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Scope

Genuit is underpinned by its purpose *'Together, we create sustainable living'*. We are committed to operating responsibly and are focused on making the built environment more sustainable. In delivering our sustainability and strategic commitments, we must ensure adherence to the highest standards of ethical professional conduct. We expect our employees to treat our suppliers with fairness and respect and to work collaboratively with them to build trusting, respectful, ethical and constructive working relationships. In turn, we expect our suppliers to operate using the same principles and treat our employees with the same professionalism and probity our employees treat them. Working collaboratively with our suppliers improves supply chain performance, enhances product quality and mitigates risk, helping to realise supply chain efficiency and collaborative and transparent relationships.

We partner with suppliers who share our commitment to the ethical practices and adhere to all applicable legal and regulatory requirements in their business dealings and relationships. The standards set forth in this Code are the minimum standards that our Suppliers must meet to conduct business with Genuit. Any supplier's failure to notify Genuit of any breach and/or supplier's noncompliance with this Code shall be grounds to terminate the relevant contract or purchase order with such supplier.

References

Anti-Slavery Policy and Human Rights Policy
Genuit's Sustainable Supplier Sourcing Policy

Policy

This Code applies to all third-party suppliers of goods and/or services to the Genuit Group. Within the Code, 'Genuit' and 'Company' refers to Genuit Group plc and its subsidiaries. 'Our' and 'we' refers to Genuit Group plc'.

We expect the following from our suppliers:

Business Ethics and Fair Business Practices

- Conduct business in a fair and ethical manner, whilst maintaining high standards of professionalism, integrity, confidentiality, and privacy.
- Neither use, nor misappropriate or disseminate, the Intellectual property of Genuit Group.
- Not use any non-public information about Genuit, its business transactions or customers as the basis of trading in Genuit Group plc stock or the stock of other companies. It is the duty of suppliers to communicate this to their employees who have access to non-public information about Genuit.
- To respect privacy rights and implement and maintain physical, organisational, and technical measures to ensure the security and confidentiality of Genuit Data to prevent accidental, unauthorised or unlawful destruction, alteration, modification or loss of Genuit Data, misuse of Genuit Data, or unlawful processing of Genuit Data; and to protect supplier operations and facilities against exploitation by criminal or terrorist individuals and organisations.
- Not to commit any acts which negatively impact Genuit's reputation.
- Not to participate in anti-competitive practices and negotiate all agreements in accordance with fair competition principles.
- Disclose any potential conflict of interest immediately to the Genuit Group Procurement Director and Genuit Group Legal Counsel. A conflict of interest occurs when an individual has a personal interest that may prevent them from performing tasks in an objective manner. This includes but is not limited to a supplier having a personal or familial relationship with a Genuit employee, a supplier having financial interests that conflict with their work for Genuit, or the Supplier having commitments or other interests that may compromise its contractual obligations with Genuit.
- Act with transparency and comply with all applicable anti-corruption and anti-bribery laws, including The Bribery Act 2010. Offering or accepting bribes, kickbacks, favours, gifts, or entertainment with an aim to influence business decisions or any other improper advantages to obtain or retain business will not be tolerated.

Human Rights and Labour Practices

The following principles are followed by all businesses within Genuit Group:

- respect for the dignity of the individual;
- recognise the importance of each individuals' human rights;
- increase equality of opportunity and inclusion;
- not accept any form of discrimination, harassment or bullying; and
- not tolerate any form of slavery, human trafficking or forced or compulsory labour.

These basic principles inform our policies and processes related to the rights and freedoms of every person who works for us. They are embedded in our internal Anti-Slavery Policy and Human Rights Policy, and we expect these principles to be applied by our suppliers to ensure these apply throughout our supply chain.

To ensure compliance, we expect our suppliers to abide by the following labour and human rights standards:

- **Work Environment and Working Hours** Suppliers shall provide their employees with safe and healthy working conditions, ensuring the highest health and safety standards and work environment; taking all feasible steps to prevent incidents and injuries. Suppliers should develop and implement emergency plans and ensure employees are adequately informed about health and safety issues and trained where required. Suppliers shall maintain reasonable employee work

hours in compliance with local standards and applicable national laws of the countries where suppliers do business. Employees shall not work more hours in one week than allowable under applicable law.

- **Fair Compensation** Suppliers shall fairly compensate their employees by providing wages and benefits compliant with the national laws of the countries where suppliers do business and shall be compensated for overtime work consistent with applicable law.
- **Human Rights or Human Trafficking** Suppliers shall maintain employment on a voluntary basis. Suppliers will not participate in or purchase materials or services from any person or company engaged in involuntary prisoner labour, forced, bonded, or indentured labour, slavery, or human trafficking.
- **No Child Labour** Suppliers must not use child labour. The term “child” refers to any person under the minimum legal age for employment where the work is performed. Suppliers must prove their products comply with the labour laws of the countries where they do business.
- **Disciplinary Actions** Suppliers shall treat their employees with respect and dignity. Suppliers must provide a work environment free of physical punishment, harsh or inhumane treatment, coercion, harassment, threats, or abuse in any form.
- **Non-Discrimination** Suppliers should not discriminate against their employees in hiring practices or any other term or condition of work on the basis of any characteristics that may be protected by applicable law, such as age, colour, disability, gender, national origin or geographic background, race, religion, marital status, or sexual orientation.

Impact on the Environment

We expect our suppliers to be aware of and support Genuit in complying with its commitment to make the built environment more sustainable, helping to create a more resilient planet, society and business. This is in delivery of the wider policy that sits behind the contract, and in the delivery of Genuit Group Sustainability targets as outlined on our website and within our Annual Reports, including our target to achieve net zero by 2050. To this end, our suppliers should provide materials to Genuit and conduct their business in a way that supports and safeguards the environment in accordance with applicable laws and regulations. This includes complying with applicable environmental laws regarding hazardous materials, waste and wastewater discharges, air emissions, and other environmental matters. Suppliers should consider the environmental effects of conducting their business. Genuit expects its Suppliers to have continuous improvement measures related to environmental and sustainability procedures, including the reduction of greenhouse gases, carbon dioxide emissions, and waste. Suppliers should monitor waste generation, water quality, air pollutants, and the consumption of natural resources.

Where applicable, suppliers should adhere to Genuit’s Sustainable Supplier Sourcing Policy, if requested by Genuit.

Supplier Undertaking

As a Supplier to the Genuit Group you accept and confirm that you comply with this Genuit Supplier Code of Conduct.

As outlined above, non-compliance with this Supplier Code of Conduct may lead to immediate termination of business with the Genuit Group.