



SUPPLIER CODE OF CONDUCT

June 2022

FOREWORD

Since our incorporation in 1989 the Scolmore International Group has become a significant force in the electrical accessory market.

We're proud to be a British, family-run business, with an excellent track record of listening to what our customers need and providing the right solution every time.

The Company is very much built on people. Each individual makes a unique contribution to the business and its customers.

"Our long-term business success and continuous growth is only possible by operating responsibly in alignment with universal standards."

Gary Mordue

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INTEGRITY AND SUSTAINABILITY

At Scolmore integrity is essential to our business.

We are committed to conducting business in a responsible and sustainable way and we require the same from our suppliers.

This Supplier Code of Conduct (hereafter called 'the SCoC') reflects the core values and the high ethical standards which inspire our employees, business partners and all other stakeholders.

It is based on the UN Global Compact, the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises as well as other international standards, norms, and guidelines.

COMPLIANCE WITH LAWS

We expect all our suppliers to conduct their business consistently in compliance with this SCoC as well as the laws and regulations applicable in the country they operate in. Should there be a conflict between this SCoC and the applicable laws and regulations, Scolmore International expects its suppliers to meet the most stringent requirements.

TRANSPARENCY

We aim to be transparent in our dealing with our suppliers and we expect our suppliers to be open and honest in their dealing with us.

CONTINUAL IMPROVEMENT

Scolmore reserves the right to monitor and audit, directly or via reputable third parties, each supplier's compliance with this SCoC and expects its suppliers to cooperate by providing meaningful information, access to premises and relevant individuals' availability.

While we appreciate that suppliers might be at different stages of their compliance maturity, we therefore commit to working with them to offer guidance aimed at achieving continuous improvement.

Nevertheless, we do expect all suppliers not meeting this SCoC requirements and expectations to take prompt and effective corrective actions.

We also expect our suppliers to equally monitor and audit their own supply chain.

REPORTING CONCERNS

One of the pillars of a robust ethical culture is creating an open environment where employees feel free to report instances of non-compliance, suspected illegal or unethical behaviours or other forms of misconduct.

At Scolmore we are committed to investigating reports of suspected or known misconduct, and to taking appropriate action based on our findings.

Our suppliers must provide their employees with appropriate means to raise problems or concerns for discussion, without any fear of retaliation.

Suppliers, their employees, or their supply chain can also report any concerns, by speaking to Scolmore relevant contact, or by emailing compliance@scolmore.com.

HUMAN RIGHTS

Our suppliers and business partners must support and respects the protection of internationally proclaimed human rights.

MODERN SLAVERY AND FORCED LABOUR

Scolmore is vehemently opposed to the use of slavery in all forms and any attempt to control or reduce freedom of thought, conscience and religion.

Suppliers shall treat people with respect and dignity and avoid any form of human trafficking and forced labour.

We expect all our suppliers to comply with our Zero tolerance policy towards modern slavery, forced labour and human trafficking.

Suppliers shall not participate in, or benefit from any form of forced labour, including bonded labour, involuntary prison labour, slavery, servitude, or work performed under the menace of a penalty or coercion.

CHILD LABOUR AND YOUNG WORKERS

The ILO defines “child labour” as work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of work can be called child labour depends on the child's age, the types of work performed, the conditions under which it is performed, and the objectives pursued by individual countries. The answer varies from country to country, as well as among sectors within countries.

Suppliers shall not use child labor or conduct business with business partners using child labor in compliance with the ILO conventions as well as the locally applicable regulations.

FAIR LABOUR PRACTICES

Scolmore is committed to complying with all relevant employment legislation and regulations which we regard as the minimum, rather than the recommended standard. We expect the same commitment from our suppliers and business partners.

DIGNITY AT WORK

All workers should be treated equally.

No worker should be discriminated against because of age, gender, race, sexual orientation, religion or beliefs, gender reassignment, marital status or pregnancy or any other protected category.

Corporal punishment, harassment in any form, or bullying in any form shall not be tolerated.

INCLUSIVE EMPLOYMENT OPPORTUNITIES

We are fully committed to the principles of equality and diversity in the workplace and regard harassment as a form of discrimination. As such our suppliers should not tolerate any form of bullying or harassment and they should value people as individuals with diverse opinions, cultures, lifestyles and circumstances.

MINIMUM WAGE AND FREEDOM OF ASSOCIATION

All workers should be treated equally. Workers with the same experience and qualifications should receive equal pay for equal work.

No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any retaliation as a result of joining, or failing to join, any such organisation.

HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

We are committed to protect the health, safety and well-being of our employees, as well as the environment. We strive to prevent and reduce pollution. We actively contribute towards the transition to a circular economy.

OCCUPATIONAL HEALTH & SAFETY

Suppliers must protect the health, safety and well-being of their human capital, service providers, subcontractors, visitors and any person who could be affected by their activities and operations.

To do so they must periodically assess and review their H&S risks, provide and maintain safe systems of work and offer adequate training and induction. They should seek to establish an incident-free environment.

Furthermore, they shall comply with all applicable laws and regulations and use their best efforts to respect health and safety procedures.

ENVIRONMENTAL MANAGEMENT SYSTEM

Suppliers shall implement a suitable environmental management system to identify and address the negative environmental impacts of their activities and products.

They should control the consumption of energy as well as natural resources and keep their waste streams to a minimum while maximising re-cycling and reuse of materials where possible

They shall comply with all applicable laws and regulations for the protection of the environment.

CLIMATE CHANGE

We encourage our suppliers to periodically assess their carbon footprint and put in place actions to reduce greenhouses gas emissions.

REGULATED SUBSTANCES

Supplier shall comply with regulated substance and product content specifications and with any applicable laws prohibiting or restricting the use, content or handling of specific substances, including, but not limited to RoHS, WEEE, REACH, and other similar Laws. Suppliers shall provide Scolmore information relative to the foregoing, including, but not limited to, Material Declarations, as applicable.

CONFLICT MINERALS

Suppliers must ensure that products supplied to Scolmore do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups.

ETHICS

Scolmore is committed to conducting business with a high level of integrity and comply with all applicable laws and regulations.

BUSINESS INTEGRITY

At Scolmore there's "zero" tolerance for any form of bribery or corruption, including embezzlement, money laundering, kickbacks, extortion, fraud, nepotism (family) or cronyism (friends).

Suppliers must uphold the same highest standards of integrity in all business interactions.

CORRUPTION AND BRIBERY

Suppliers must neither tolerate nor engage in any form of direct or indirect corruption, influence peddling, bribery, embezzlement, extortion, or fraud.

GIFTS AND HOSPITALITY

When accepting or offering gifts or invitations on behalf or for the intended benefit of Scolmore, suppliers must always make sure that they do comply with local regulations.

Gifts and invitations that may be considered acceptable must be of nominal value and must not be of such a nature as or be perceived as influencing the judgment of the person receiving them. They must not be used to gain an unfair advantage.

FACILITATION PAYMENTS

In line with Scolmore, suppliers shall not make and / or accept facilitation payments also known as kickbacks (typically small, unofficial payments made to secure or expedite a routine government action by a government official) on behalf or for the intended benefit of Scolmore, not even in countries where facilitation payments are tolerated by law.

CONFLICTS OF INTEREST

Suppliers shall avoid all forms of conflicts of interest and situations that could have the appearance of a conflict of interest in the business they conduct with Scolmore. Should the suppliers come across a potential or real conflicts of interest, they shall disclose them without delay in writing to their Scolmore contact or the compliance department.

FAIR COMPETITION

Antitrust and competition laws are designed to uphold free and open competition in the marketplace.

Suppliers shall comply with all applicable competition and antitrust laws and regulations. They shall refrain from practices undermining the free market such as fixing or controlling prices, terms and condition; or restricting competition; or soliciting or sharing information with current or potential competitors in breach of competition laws; or dividing or allocating clients, markets or territories; or influence the outcome of a bidding process in an unfair way.

EXPORT AND INTERNATIONAL TRADE

When importing or exporting the goods and services they provide, suppliers shall avoid acting in violation of any applicable local and international export controls, economic sanctions and anti-boycott laws applicable in all the jurisdictions where they do business. They should obtain all required licenses or authorisations.

DATA PROTECTION AND INTELLECTUAL PROPERTY

Suppliers must not use personal data for any purposes other than those for which it was provided

They shall implement appropriate measures to respect privacy and to protect personal data against loss and unauthorized access or use.

Any confidential or proprietary information, including personal data, belonging to Scolmore, its clients, its, competitors and its business partners must be protected against unauthorised access, destruction, misuse, alteration and disclosure, by means of appropriate physical and electronic security procedures. In the event of a cyberattack suppliers shall notify Scolmore without delay.

ACCURATE RECORDS

Suppliers shall accurately record, maintain, and report business documentation including, but not limited to, financial accounts, quality reports, time records, expense reports, and submissions to customers or regulatory authorities when appropriate.

ANTI-MONEY LAUNDERING AND TAX EVASION

Suppliers must comply with all applicable anti-money laundering laws. They shall apply a 'zero' tolerance policy with respect to any criminal facilitation, including tax evasion.