

Vendor Code of Conduct

ISSUE DATE

30/01/2021



Our Approach to Responsible and Sustainable Business

Glenveagh Properties PLC is committed to conducting its business in a manner that protects the environment and safeguards the health, safety and welfare of all persons working for or on our behalf. Moreover, to achieve our objectives it is crucial that we act ethically and responsibly, and this includes the manner in which we source goods and services from our Suppliers.

The principles in this code sets out the key social, ethical, and environmental standards that we expect you to achieve. These principles stem from our six sustainability priorities, which are:

- Putting customers at the heart of what we do.
- Creating sustainable homes and communities.
- Environmentally considerate and efficient operation.
- Sustainable and responsible sourcing.
- Attracting, inspiring, and investing in people.
- Keeping people safe.

Scope

Our Vendor Code of Conduct applies to all our vendors and their employees and is an integral part of the contractual relationship between Glenveagh and its vendors. We refer to “vendors” as a collective term for an overarching group of suppliers, subcontractors, professional service providers, consultants, intermediaries, and agents.

In case there is a conflict between the applicable terms and conditions, this Vendor Code of Conduct prevails over the terms for the relevant subject matters, unless those terms are more specific and stringent.

Compliance and Engagement

All Glenveagh vendors are expected to meet or exceed all of the provisions of this Code. This is in addition to the requirement, in your supplier agreement(s) with Glenveagh, to comply with applicable laws, regulatory requirements and applicable Glenveagh Group policies.

In situations where you are not yet compliant with the expectations set out in this Code, you must let us know. We will work with you on the development of an improvement plan.

In case there are questions regarding this Vendor Code of Conduct, or you wish to report suspected or known misconduct, please get in contact with your local Procurement contact

What You Need To Do

As a Glenveagh vendor, you are expected to:

- Confirm your compliance with Vendor Code of Conduct (and any future revisions) when you complete our onboarding process.
- Ensure that the principles outlined in this Vendor Code of Conduct are communicated with your officers, employees and key subcontractors that support Glenveagh projects.
- Inform us if anything changes and you are unable to comply with the Code.

Expected Behaviour

Compliant behaviour from our vendors is expected in the following areas:

- Respecting Human Rights.
- Ensuring Health & Safety.

- Promoting Inclusion and Diversity.
- Respecting Local Communities.
- Protecting Environment and Nature.
- Protecting data and privacy.
- Honouring business obligations.
- Preventing Bribery & Corruption.
- Competing fairly and following the law.
- Managing Supply Chain Responsibly.

All employees at Glenveagh adhere to these standards, so we expect all our vendors to do the same.

Respecting Human Rights

- Comply with Glenveagh’s “Human Rights, Anti-Slavery and Human Trafficking Policy”.
- Never use or tolerate the use of human trafficking, forced labour, or child labour as defined by the International Labour Organization (ILO) throughout your operations and from those associated with your business.
- Meet or exceed all legal requirements for compensation and working conditions.
- Ensure working hours are in accordance with local regulation and industry practice and overtime is appropriately compensated.
- Ensure that workers are free to file grievances to their employers about the employer's treatment of them.
- Respect employees’ freedom of association. Don’t retaliate or discriminate against any person in your work force who chooses to exercise this right.
- Respect workers’ broader human rights as outlined in the European Convention on Human Rights and eight “fundamental” conventions identified by the ILO, covering subjects that are fundamental principles and rights at work.

Ensuring Health & Safety

- Comply with all current statutory requirements, common law duties, codes of practice and best industry standards relating to Glenveagh’s activities.
- Commit to the prevention of injury and ill health of workers, visitors, and clients.
- Ensure that adequate resources, structures, and systems are in place to effectively manage workplace safety, health, and welfare.
- Effectively communicate risk assessments and the health and safety policy to your staff and provide any additional training as identified by your risk assessment process.
- Provide supervision to enable employees to perform their work safely and effectively.

Promoting Inclusion and Diversity

- Do not discriminate against any group on your employment practices.
- Promote an inclusive work environment that is free of harassment and discrimination.
- Ensure that the expectation of behaviour of all employees is uniformly applied.
- Proactively foster an inclusive working environment and the development of a diverse workforce at all levels of the organisation, including diversity of gender, age, disability, sexual orientation, ethnicity, and nationality.

Respecting Local Communities.

- Respect communities in which you operate, including their cultures and local traditions.

- Strive to create positive impacts on communities and help improve their wellbeing through delivery of products and services.
- Inform involved communities on projects and consider any concerns of those communities.

Protecting Environment and Nature

- Ensure compliance with all relevant environmental laws and standards.
- Promote culture of environmental sustainability throughout your company and business operations.
- Strive to (re)use raw materials, energy, and other natural resources efficiently, while minimizing waste, emissions, and noise.

Protecting Data and Privacy

- Protect confidential information and personal data from unauthorised access, disclosure, or destruction.
- Only keep data as long as it is necessary for the intended purpose and securely delete or return it once it is no longer needed.

Honouring business obligations

- Share our commitment to conducting business honestly and transparently.
- Honour business obligations and manage unanticipated events in a proactive, timely, and open way.

Preventing Bribery & Corruption

- Never offer or accept bribes, kickbacks, or anything else of value in order to gain an improper business advantage.
- Never tolerate extortion, corruption, and/or embezzlement.

Competing fairly and following the law.

- Treat legal requirements as a minimum standard.
- Compete fairly and comply with antitrust and competition laws in the countries and regions in which you operate.

Managing Supply Chain Responsibly

- Manage your own suppliers appropriately to mitigate supply chain risks, and to ensure that they are aware of, and compliant with, the aims of this Code.
- Have reasonable payment policies covering your own suppliers.



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Chief Executive Officer

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