

Supplier/Subcontractor Code of Conduct

AIM & SCOPE

Remsdaq recognises that its relationship with suppliers and subcontractors is critical to successful performance of the business and seeks to build trusting and effective collaborative relationships that are focused on delivering for our customers.

This Supplier/Subcontractor Code of Conduct sets out the matching behaviours that we expect of suppliers and subcontractors who are delivering goods and/or services to, or on behalf of, Remsdaq. We expect our suppliers and subcontractors to communicate this code of conduct to their employees, parent company, subsidiaries, suppliers and subcontractors.

This code is intended to be used by all Remsdaq employees and all suppliers and subcontractors in its supply chain. Any queries regarding this code should be referred to the Purchasing Manager [purchasing@remsdaq.com].

STANDARDS OF BEHAVIOUR

RESPECTFUL TREATMENT

We expect our employees to treat suppliers and subcontractors with fairness and respect and in return we expect suppliers and subcontractors to treat our employees and customers in the same way.

The Equality Act 2010 protects against discrimination, harassment and victimisation. We will not tolerate discrimination, harassment or victimisation in the workplace and we expect our suppliers and subcontractors to provide the same commitment to our employees and customers as well as to their own employees, suppliers and subcontractors.

PROFESSIONAL BEHAVIOUR

Wherever they operate we expect our suppliers and subcontractors to act in a manner that is compatible with our values, uphold our reputation, promote innovation and expertise, open up the market to small and medium-sized enterprises and contribute to growth and prosperity in the UK.

We expect suppliers and subcontractors to be prepared to invest in their relationship with Remsdaq and establish trust with our staff and with other suppliers and subcontractors involved in delivery.

We also expect suppliers and subcontractors to speak out, without fear of consequence, when a project or service is unlikely to succeed because of our behaviour or a lack of good governance or when a contract is deemed no longer fit for purpose (e.g. in its contractual stipulations or measures).

We expect suppliers and subcontractors to behave in accordance with recognised standards and be forthcoming with information required where a contract or agreement is coming to an end and is in a transitional phase leading to contract exit.

We expect suppliers and subcontractors to work in good faith to resolve any disputes promptly and fairly during the life of a contract through good relationship management and, where appropriate, contractual dispute resolution mechanisms.

HUMAN RIGHTS AND EMPLOYMENT LAW

Suppliers and subcontractors must comply with all applicable human rights and employment laws in the jurisdictions in which they work and have robust means of ensuring that the suppliers and



subcontractors in their supply chain also comply. This includes complying with the provisions of the Modern Slavery Act 2015. We will not employ child, forced or bonded labour nor condone such practices.

ETHICAL BEHAVIOUR

We expect the highest standards of business ethics from our suppliers and subcontractors and throughout the supply chain. We expect suppliers and subcontractors to be explicit about the standards they demand of their executives, employees, partners, suppliers and subcontractors and to have the governance and audit processes to monitor and enforce these standards.

COUNTER FRAUD AND CORRUPTION

We demand that suppliers and subcontractors adhere to anti-corruption laws including, but not limited to, the Bribery Act 2010 and anti-money laundering regulations. We expect suppliers and subcontractors to have robust processes to ensure that the suppliers and subcontractors in their supply chain also comply with these laws. We have zero tolerance of any form of corrupt practices including extortion and fraud and we expect suppliers and subcontractors to be vigilant and proactive in identifying fraud, and the risk of fraud, in their business. Suppliers and subcontractors should immediately notify Remsdaq where fraudulent practice is suspected or uncovered and disclose any information that might impact Remsdaq's business, operation or reputation in any way whatsoever.

TRANSPARENCY

We expect suppliers and subcontractors to be open and honest in their dealings with Remsdaq. In addition, and where appropriate, we expect full and prompt disclosure of cost, revenue and margin information ("Open Book Accounting and Open Book Contract Management") in line with published guidance and any terms of contract.

TREATMENT OF SUPPLIERS AND SUBCONTRACTORS

We expect our suppliers and subcontractors to deal fairly with the suppliers and subcontractors in their supply chain and to observe the principles of the Prompt Payment Code. We expect suppliers and subcontractors to avoid flowing unreasonable levels of risk to their suppliers and subcontractors who cannot reasonably be expected to manage or carry such risks. We expect suppliers and subcontractors to encourage innovation in their supply chain to increase the value or quality of supply and not to create barriers for small and medium-sized enterprises who are qualified to provide goods or services.

CORPORATE SOCIAL RESPONSIBILITY

We expect our suppliers and subcontractors to be good corporate citizens, uphold the values of this code and support Remsdaq's Corporate Social Responsibility objectives.

BUSINESS PRACTICES

MANAGEMENT OF RISK

We believe that risk should be placed with the party best able to manage it. This means requiring suppliers and subcontractors not to flow risk inappropriately to their suppliers and subcontractors and not to assert that they can manage risk that would be better managed by Remsdaq. All parties should be prepared to share intelligence of supply chain risks so that material commercial and operational risks can be mitigated (e.g. the impact of losing a key supplier).



CONTINUOUS IMPROVEMENT

We expect our suppliers and subcontractors to use recognised industry practices in the delivery of goods and services to, or on behalf of, Remsdaq. We also expect suppliers and subcontractors to continuously improve these goods and services and bring world-class innovation, ideas and expertise to help Remsdaq address its strategic challenges and to support growth and prosperity in the UK.

END-TO-END DELIVERY

Some of the services that Remsdaq require are complex and no single supplier or subcontractor will have complete contractual responsibility for every element of what is needed to deliver to the end customer. We expect suppliers and subcontractors to be aware of how they contribute to that overall delivery and to work with Remsdaq and any other suppliers and subcontractors to ensure that their goods or services are used effectively in the delivery of a high quality service to Remsdaq's end customer.

VALUE

Customers expect excellent value for money. This means that contracts should be priced to offer sustainable value throughout their life, including when changes are needed. Whilst we accept our suppliers make a profit margin in return for the risk they are accepting, we expect suppliers and subcontractors not to exploit an incumbent or monopoly position, an urgent situation or an asymmetry of capability or information to impose opportunistic pricing.

REPUTATION

We want to work with suppliers and subcontractors who are proud of their reputation for fair dealing and quality delivery. We also want to be seen as reputation enhancing for the supplier or subcontractor. We expect suppliers and subcontractors to be protective of Remsdaq's reputation and ensure that neither they, nor any of their suppliers or subcontractors, bring Remsdaq into disrepute by engaging in any act or omission which is reasonably likely to diminish the trust that our customers place in us.

CONFIDENTIALITY

Suppliers and subcontractors are expected to comply with the provisions in their contracts and any legal requirements to protect sensitive information, commercial or otherwise. Suppliers and subcontractors may also be party to confidential information that is necessary for them to be effective partners. This information, even if it is not covered by contractual provisions, should be handled with the same care as information of similar sensitivity in the supplier's and subcontractor's own organisation.

DATA SECURITY

It is essential that suppliers and subcontractors safeguard the integrity and security of their systems to prevent unauthorised access to any Remsdaq-related data. Suppliers and subcontractors must immediately inform Remsdaq if they become aware of any incident or data breach that affects, or has the potential to affect, the security of Remsdaq data.

GDPR

Suppliers and subcontractors are expected to comply with the principles of data protection as set out in the General Data Protection Regulation. We expect our suppliers and subcontractors to provide sufficient guarantees under GDPR and to confirm that the rights of Remsdaq data subjects will be



respected and protected. Suppliers and subcontractors must immediately inform the ICO of any data breach that affects, or has the potential to affect, the security of a Remsdaq employee's data.

SUSTAINABLE PROCUREMENT

We expect our suppliers and subcontractors to assist Remsdaq in the understanding and reduction of supply chain impacts on our environment and risks related to the security of raw material supply. We expect suppliers and subcontractors to be open and transparent in assisting Remsdaq in reporting publicly on goods, materials or service utilisation and any environmental impacts.

CONFLICT OF INTEREST

We expect suppliers and subcontractors to mitigate appropriately against any real or perceived conflict of interest through their work with Remsdaq. A supplier or subcontractor with a position of influence gained through a contract should not use that position to unfairly disadvantage any other supplier or subcontractor or reduce the potential for future competition (e.g. by creating a technical solution that locks in the supplier's or subcontractor's own goods or services).

COMPLIANCE

The overall objective of this Supplier/Subcontractor Code of Conduct is to drive improved performance throughout Remsdaq's supply chain by building trusting and open relationships with our supplier/subcontractor base. Suppliers and subcontractors who provide goods or services to, or on behalf of, Remsdaq are expected to comply with all aspects of this code and be open and transparent with Remsdaq in relation to breaches or suspected breaches of this Code of Conduct and should promptly notify Remsdaq of any such breach.

Ray Colston
Managing Director

