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**Supplier Code of Conduct**

Lawton Communications Group Limited

Five by Five Limited

Dragonfish Consulting Limited

Lawton Communications Group, and our subsidiary businesses Five by Five and dragonfish consulting, work with a variety of suppliers for our businesses to operate effectively.

As an organisation we hold ourselves to high standards across areas such as human rights, the environment and sustainability, ethical conduct, and our workplace. To ensure these standards are replicated throughout our supply chain, we have set out a supplier code of conduct that we expect every business we interact with to meet, in addition to the provisions of any commercial terms agreed between our agencies and the supplier, and all applicable laws and regulations of the countries in which they operate.

We recognise that this supplier code of conduct is a first step, and that further processes and procedures must be implemented to ensure we are able to confirm these standards are being met by our suppliers. We are prioritising higher risk countries and suppliers and aim to have all our suppliers, partners, and affiliates validated by the end of 2022.

## **1. People**

People are the cornerstone of our businesses, we want our workplaces to be a place of mutual respect and trust, which embraces diversity and treats everyone consistently and fairly based on skill, performance and contribution. We expect our suppliers to do the same. Suppliers must comply with applicable international and national laws and standards in relation to human rights and labour practices:

### **1.2. Fair Treatment and Equal Opportunity**

Suppliers must not discriminate in any area of employment – including recruitment, promotion, reward and recognition, training and development opportunities, termination or retirement – based on (but not limited to) sex, race, colour, national or ethnic origin, sexual orientation, gender identity or expression, religion, political beliefs, trade union activity, marital status, caring responsibilities, disability, age or citizenship.

### **1.3. Respectful Workplace**

Suppliers must treat those who work for them with dignity and respect, promoting a working environment free from discrimination, harassment, victimisation and abuse.

### **1.4. Child Labour**

We expect our suppliers to comply with local laws regarding the minimum age of employees. The minimum age for workers shall not be less than the age of completion of compulsory schooling, normally not less than 15 years. Suppliers must comply with all other applicable employment laws and regulations, particularly those pertaining to working hours, minimum wage requirements and safe working conditions.

### **1.5. Modern Slavery/Forced Labour**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we expect our

suppliers to operate with the same approach and be committed to acting ethically and with integrity in all their business dealings and relationships. Suppliers must implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in their own business or in any of their supply chains.

#### 1.6. Pay and benefits

As a minimum, we expect suppliers to comply with all national regulations on pay and benefits. These should be sufficient to meet basic needs of workers and families. They must be compensated at a minimum in line with local laws for overtime hours worked and all overtime should be voluntary.

#### 1.7. Working hours

Suppliers are expected to comply with national regulations on working hours. Employees should have annual leave provision and be permitted at least one nonworking day per seven-day period on average.

#### 1.8. Freedom of Association and Collective Bargaining

Suppliers shall freely allow workers to associate with others, form, and join (or refrain from joining) organisations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment. In the absence of formal representation, suppliers shall ensure that workers have a mechanism to report grievances and that facilitates open communication between management and workers.

## 2. Business

We are committed to the highest standards of ethical behaviour, integrity and compliance and believe this is essential to protecting the reputation and long-term viability and success of our business. We expect Suppliers to behave ethically and appropriately in all business activities as well as act in compliance with legal and industry requirements and seek to implement best practice in their industries.

#### 2.2. Anti-Bribery, Corruption and Facilitation Payments

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company to induce or influence that individual or company to perform public or corporate functions or duties which are illegal, unethical, a breach of trust or improper in any way. Bribery includes offering, promising, giving, accepting or seeking a bribe.

The Company does not tolerate any form of bribery, whether direct or indirect and expects its suppliers to uphold the same standards. All suppliers must conduct their business to a high ethical standard and comply with relevant legislation on bribery, corruption and prohibited business practice

#### 2.3. Gifts and Hospitality

We develop long term business relationships based on trust and respect. We do not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services. Whilst exchanging gifts and hospitality can build goodwill, it may, or may appear to create improper influence. Any gift or hospitality we accept or give in connection with our business dealings should always be customary and reasonable in terms of value and frequency.

Suppliers should not provide any gifts, hospitality, meals, or entertainment to our employees in any situation, which may influence or appear to influence any business decisions. In other situations, suppliers may provide modest gifts, meals or entertainment to our employees where they do not violate any laws and are customary and reasonable in terms of value and frequency (never cash or cash equivalent).

#### 2.4. Facilitation of tax evasion

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to facilitation of tax evasion, whether under UK law or under the law of any foreign country.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter tax evasion facilitation. We will uphold all laws relevant to countering tax evasion, including the Criminal Finances Act 2017.

#### 2.5. Conflicts of Interest

We expect our suppliers to avoid any conflict of interest in their business dealings wherever possible, conducting their business with integrity and full transparency. Where potential conflicts of interest do occur, we expect our supplier to notify us in writing so that a thorough assessment of the situation can be undertaken and a decision made on how to progress.

#### 2.6. Data Protection

Any personal data our suppliers receive through business dealings with the us must only be used for the agreed purpose. Security of such personal data is paramount and as such personal data should be kept securely, protected from unauthorised access or disclosure and retained only for as long as is necessary to provide the services. You are required to comply with relevant Data Protection legislation and best practice guidance (as amended and updated from time to time). Specific data protection and information security obligations may be included in your contract with us, which you must strictly comply with.

### 3. Planet

As a global company, we recognise our responsibility to society, the economy, and the environment. We aim to make a positive difference to communities in which we operate and expect our suppliers to prioritise this in their dealings with customers, suppliers employees and communities.\

#### 3.2. Health and Safety

We expect all suppliers to provide and maintain a clean, safe and healthy working environment in compliance with all applicable health and safety regulations and all legally mandated standards for workplace health and safety in the countries in which they operate.

We require everyone who works for or with us to understand the health and safety risks of their activities and apply good health and safety management systems, training and practices in all they do. They should also take the necessary precautions to protect everyone from workplace injuries and occupational disease.

#### 3.3. Environment & sustainability

We are committed to improving our environmental performance and ensuring we are truly sustainable businesses. We recognise that we undertake a variety of activities which may have an effect on the environment and our suppliers play a vital role in supporting our efforts to be carbon neutral by 2030.

We expect our suppliers to support our environmental goals by implementing policies and best practices, and striving for including continuous improvement, including in the following areas:

- Comply with all applicable current and future environmental laws and regulations
- Seeking to reduce negative environmental impacts including the prevention of pollution and Co2 emissions and providing visible progress towards this
- Encourage the use of environmentally friendly technologies and practices and the reduction of negative environmental impacts throughout their supply chain.
- Seeking to measure and understand the Greenhouse Gas emissions associated with its supply of products or services and support us in understanding emissions within the supply chain.
- Implement an environmental management system and we would value suppliers who are working towards or have a certified management system or accreditation.

#### **4. Code of Conduct Compliance**

Suppliers must conform to all aspects of the Code (as amended from time to time) and make the information and expectation readily available to their employees and sub-contractors. We reserve the right to validate suppliers' compliance with the Code and suppliers must be able to provide evidence of compliance upon request. We reserve the right to terminate business relationships in the event of material breach of the principles set out in the Code. Suppliers are encouraged to disseminate these expectations throughout their own supply chain and incorporating the principles set out in the Code as part of routine business practice. If Suppliers have an actual or potential ethical concern related to the Code or any engagement or relationship with us, they are encouraged to make us aware immediately by sending an email to [suppliercodeofconduct@lawtoncommsgroup.com](mailto:suppliercodeofconduct@lawtoncommsgroup.com).