ESG PRO LIMITED
Shrawley House, Shrawley,
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www.esgpro.co.uk

# ESG Pro Limited
# Supplier Code of Conduct

### 1. Purpose and scope

ESG Pro Limited is committed to responsible purchasing and working with suppliers who respect human rights, conduct business ethically, protect the environment, and provide safe and healthy working conditions. This Supplier Code of Conduct (the Code) establishes the standards we expect from suppliers, subcontractors, independent consultants, labour providers, and other external providers working with or on behalf of ESG Pro Limited.

The Code applies proportionately to goods and services purchased for our own operations and to external activities supporting client delivery. Our business is primarily a professional consultancy delivered remotely, with work-related travel, occasional client-site visits, digital equipment, and externally provided services. Requirements are applied in light of the nature of each engagement and its actual risks, rather than assuming all suppliers operate factories or high-risk sites.

This Code supports ESG Pro Limited's environmental and occupational health and safety management arrangements, including relevant controls for purchasing, contractors, and externally provided processes under ISO 14001:2026 and ISO 45001:2018, as amended in 2024. It does not assert that suppliers must hold ISO certification. Suppliers must comply with applicable laws and contractual obligations, and raise any conflict or uncertainty about the requirements promptly.

### 2. Ethical business conduct and legal compliance

#### 2.1 Compliance, integrity and transparency

Suppliers shall operate lawfully, maintain the licences and approvals needed for their activities, provide accurate and honest information, and maintain records relevant to their services. Fraud, deceptive practices, falsification of information, misleading sustainability claims, and unfair competition are not acceptable.

#### 2.2 Anti-bribery, conflicts of interest and fair competition

Suppliers shall not offer, request, give, or accept bribes, kickbacks, facilitation payments, or improper advantages. Actual or potential conflicts of interest affecting work for ESG Pro Limited must be disclosed. Suppliers shall comply with applicable competition and anti-corruption laws and avoid collusion, bid rigging, market allocation, and improper sharing of commercially sensitive information.

### 2.3 Confidentiality, data protection and intellectual property

Suppliers shall protect personal data, confidential information, client materials, and intellectual property entrusted to them. Information shall be used only for authorised purposes, handled with appropriate technical and organisational safeguards, and promptly reported if lost, compromised, or disclosed without authorisation.

### 2.4 Transparent subcontracting

Suppliers shall accurately disclose material subcontracting arrangements that could affect service delivery, labour conditions, environmental impacts, or occupational health and safety. Where contracts or client requirements call for prior approval, this must be obtained before relevant subcontracted work begins. Suppliers remain responsible for the work and conduct of their subcontractors.

## 3. Human rights and fair employment

### 3.1 No forced labour, trafficking or debt bondage

All work must be freely chosen. Suppliers shall not use forced, bonded, indentured, trafficked, or compulsory labour, or restrict workers from leaving employment in accordance with lawful notice requirements. Workers shall not be required to pay recruitment fees or deposits, surrender original passports or identification documents, or incur recruitment-related debts as a condition of employment. Wages shall not be improperly withheld.

### 3.2 Child labour and young workers

Suppliers shall not employ children below the applicable legal minimum age for employment or compulsory schooling, and in any event shall observe internationally recognised minimum-age protections. Workers under 18 shall not undertake hazardous work or other activities prohibited for young people by applicable law. Any young-worker or apprenticeship arrangements must be lawful, safe, and properly supervised.

### 3.3 Wages, working hours and voluntary overtime

Suppliers shall pay wages and provide benefits in accordance with applicable legal requirements and agreed employment terms. Working hours, rest breaks, and days off shall comply with applicable laws. Overtime shall be voluntary except where lawfully required in exceptional circumstances, and shall be compensated appropriately. Suppliers shall not use excessive hours or unreasonable production or delivery demands to place workers at risk.

### 3.4 Fair treatment and disciplinary practices

Suppliers shall provide a workplace free from unlawful discrimination, harassment, bullying, abuse, threats, corporal punishment, and coercion. Recruitment, remuneration, training, promotion, and disciplinary decisions shall be fair and based on legitimate factors. Disciplinary procedures shall be lawful, proportionate, and communicated clearly to workers.

### 3.5 Freedom of association, worker voice and grievances

Suppliers shall respect workers' lawful rights to freedom of association, collective bargaining, and worker representation. Workers must be able to raise concerns safely and without retaliation, using appropriate grievance or reporting channels. Where relevant to the size and risk of the supplier, channels should be accessible, confidential where possible, and explained to workers in a language and form they understand.

### 3.6 Accommodation and remedy

Where a supplier provides worker accommodation, it shall be safe, sanitary, and consistent with applicable requirements. Where exploitation or other serious harm is identified, the supplier shall cooperate with appropriate investigation and remediation, prioritise the safety and needs of affected workers, and support access to lawful remedy and compensation where applicable.

## 4. Occupational health and safety

Suppliers shall provide safe and healthy working conditions and take reasonable steps to prevent work-related injury and ill health. In line with the risks associated with their activities, suppliers are expected to:

- Identify hazards and assess occupational health and safety risks before and during relevant work, applying effective controls to eliminate hazards or reduce risks.
- Provide competent personnel, appropriate information and training, safe equipment, suitable supervision, and protective measures where needed.
- Consult workers, and worker representatives where they exist, on relevant hazards, controls, incidents, and opportunities to improve working conditions.
- Report work-related incidents, near misses, unsafe conditions, and emerging health and safety risks promptly through agreed channels, and take appropriate corrective action.
- Prepare for reasonably foreseeable emergencies relevant to their work, including first aid and the communication of emergency procedures where necessary.

Where work is carried out on ESG Pro Limited's behalf, during business travel, or at client and third-party premises, suppliers shall coordinate with the relevant ESG Pro Limited contact and site controller on hazards, safe working arrangements, access restrictions, emergency information, and reporting responsibilities. Relevant contractor health and safety capabilities may be considered during supplier selection and ongoing review.

## 5. Environmental responsibility

Suppliers shall comply with applicable environmental laws, prevent pollution, and take reasonable steps to protect the environment and improve environmental performance in areas relevant to the goods or services supplied. Expectations will reflect the environmental aspects and associated impacts that a supplier can control or influence, taking account of the life cycle of relevant products and services.

Depending on the activity and material risk, relevant expectations may include:

- Using energy, water, materials, and other resources responsibly, avoiding unnecessary consumption, and preventing or reducing waste.

- Managing hazardous substances, emissions, pollution risks, and waste appropriately, including responsible reuse, recycling, and end-of-life handling of electronic equipment.
- Considering relevant impacts from procurement, transport and delivery, business travel, service provision, and disposal, including greenhouse gas emissions and climate-related risks where material.
- Preventing adverse impacts on biodiversity and ecosystems where relevant to the work or product supplied.
- Providing relevant environmental information or evidence where reasonably requested for ESG Pro Limited's risk assessment, client obligations, monitoring, or reporting.

Where a supplier performs an externally provided process relevant to ESG Pro Limited's environmental management arrangements, the relevant environmental requirements and the extent of ESG Pro Limited's control or influence will be determined and communicated proportionately. This may include agreed purchasing specifications, operating controls, reporting arrangements, or periodic review.

## 6. Supplier due diligence, communication and improvement

### 6.1 Risk-based assessment and selection

ESG Pro Limited considers legal compliance, business integrity, human rights, environmental impacts, and occupational health and safety in selecting and managing material suppliers. The level of due diligence depends on the nature of the service, location, workforce, subcontracting arrangements, potential severity of harm, and other relevant risk factors. We may request relevant policies, certifications, supplier questionnaires, evidence of controls, or other reasonable documentation; certification or an external audit is not mandatory for every supplier.

### 6.2 Communication through the supply chain

Suppliers are expected to communicate relevant requirements of this Code to personnel delivering work for ESG Pro Limited and to material subcontractors where appropriate. Suppliers should make employment, safety, and grievance information accessible to their workers, taking account of language and other barriers.

### 6.3 Monitoring and corrective action

Suppliers shall cooperate with reasonable, risk-based monitoring, including document checks, discussions, evidence requests, or site-based verification where appropriate and agreed. Where concerns or nonconformities are identified, ESG Pro Limited may request an action plan with a responsible person, proportionate deadlines, and follow-up evidence. The nature and seriousness of the issue, including potential harm to affected workers, will inform escalation, remediation, or decisions about continuing the relationship.

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## 7. Responsible purchasing practices

ESG Pro Limited recognises that its own purchasing decisions can affect working conditions and the ability of suppliers to meet these expectations. When relevant, we will consider whether pricing, delivery times, late or high-volume orders, forecasting, payment practices, contract termination, penalties, or unclear specifications may contribute to unacceptable labour, safety, or environmental risks. We aim to address material concerns through practical discussion and documented actions consistent with our Supply Chain Risk Assessment and Due Diligence Policy.

## 8. Reporting concerns and protecting affected people

Suppliers and their workers are encouraged to report suspected breaches of this Code, including modern slavery, unethical behaviour, unsafe practices, environmental incidents, or other serious concerns, to their ESG Pro Limited contact or the Managing Director. Where relevant, concerns may also be raised through ESG Pro Limited's established grievance and whistleblowing arrangements. Good-faith reporting must not result in retaliation.

Where an incident or allegation is raised, ESG Pro Limited will consider the information proportionately, seek appropriate action, protect confidentiality as far as reasonably practicable, and prioritise safety and remedy where individuals may have been harmed. Serious or repeated breaches may result in strengthened controls, suspension, or termination of the relationship, subject to applicable contractual and legal requirements.

## 9. Communication, oversight and review

The employee or manager responsible for engaging a supplier shall communicate the Code and any relevant environmental, occupational health and safety, labour, or contractual requirements. Suppliers are expected to cooperate with proportionate enquiries and notify ESG Pro Limited promptly of material incidents or changes that could affect the risks of the engagement.

The Board of Directors has overall oversight of this Code. The Code will be reviewed at least annually, and sooner where significant changes occur in legal requirements, relevant ISO standards, supplier risks, business activities, or management arrangements. Material changes will be submitted to the Board for approval. This Code should be read alongside ESG Pro Limited's Company Code of Conduct, Anti-Slavery Policy, Human Rights Policy, Grievance Policy and Procedure, Whistleblowing Policy, and Supply Chain Risk Assessment and Due Diligence Policy.

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## 10. Approval and version control

Formalised and approved by the Board of Directors on **11 November 2026**



Humperdinck Jackman
CEO



Natashia Lee
Managing Director

Version control

| Date issued | Version | Date reviewed | Summary of Changes | Approved by |
|---|---|---|---|---|
| 20 July 2022 | V1.0 | 1 August 2022 | Initial Supplier Code of Conduct issued. | H. Jackman |
| 20 July 2023 | V2.0 | 1 August 2023 | No changes required; policy remains current and unchanged. | H. Jackman |
| 20 July 2024 | V3.0 | 1 August 2024 | No changes required; policy remains current and unchanged. | H. Jackman |
| 20 July 2025 | V4.0 | 1 August 2025 | No changes required; policy remains current and unchanged. | H. Jackman |
| 20 July 2026 | V5.0 | 11 November 2026 | Supplier-specific update; ISO 14001/45001 controls. | H. Jackman |