

SUPPLIER CODE OF CONDUCT



Introduction

Property Alliance Group (“PAG”) and its associated companies are committed to the highest level of ethical standards and governance. We have zero tolerance towards modern slavery and human trafficking and all forms of bribery and corruption associated with such activities. We will ensure that we comply with all legal and regulatory responsibilities including the Modern Slavery Act 2015. We will also take care to ensure that slavery and human trafficking does not exist in any part of our business or wider supply chain.

We expect our suppliers to share our commitments and approach as stated in the below guidelines. We expect them to adhere to the guidelines of this Code and that they expect these requirements also of their supply chain, including sub-contractors.

Labour

Suppliers to adopt sound labour practices and treat their workers fairly in accordance with laws and regulations and be committed to the value of and respect for all people. The standards set out in this Code should apply to all workers including and without limitation to temporary, migrant, student, contract, direct employees and any other type of worker, according to the below labour standards:

- **Child labour** – Supplier will not engage in the unlawful employment or exploitation of children, be it in their own workplace and prohibit any use of child labour with any vendor, supplier or other third party.
- **Human Trafficking & Slavery** – Supplier will not tolerate slavery, servitude and forced or compulsory labour and human trafficking. Supplier will respect the free choice of all persons and strictly prohibit forced or compulsory labour for any employees and will not do business with any organisations or entities that condone or engaged in the practice of coercing or imposing work with little or no freedom of choice.
- **Fair Treatment and Freedom against Prejudice** – Suppliers will provide their employees with a workplace free of any forms or threats of harassment, physical, mental, sexual or verbal, mental or physical torture or any discrimination based on a person’s status such as race, colour, religion or national origin, age or disability or any other characteristic protected by Law.
- **Working Hours, Wages & Benefits** – Working hours for suppliers’ employees will not exceed the maximum set by the applicable national law and will be paid in a timely manner, with payments sufficient to ensure an adequate standard of living.
- **Freedom of Association** – Suppliers will be committed to an open and constructive dialogue with their employees and workers’ representatives and the right to collective bargaining in accordance with local labour laws and established practices.
- **Personal Documents** – Suppliers will not confiscate or withhold any travel, identification or work permits, or any other valuable items, from employees / workers as a condition of employment, or to directly or indirectly restrict employee / workers’ freedoms.
- **Freedom of Movement** – Employees/workers freedom of movement should not be unreasonably restricted. Employees/workers should not be physically confined to the workplace or other premises, nor should any form of coercion be used to limit their freedoms.

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Health, Safety, Environment & Quality

Suppliers will comply with all applicable quality, health, safety and environmental regulations. Suppliers will meet generally recognised or contractually agreed quality requirements in order to provide goods and services safely for their intended use. Suppliers should have safe working procedures in place that comply with all health, safety and security laws applicable to its business.

Suppliers will provide workers at no cost with the proper personal protective equipment. Suppliers will record and report all occupational injuries and illnesses as required by Law. Suppliers will provide the necessary and appropriate health and safety training to its employees along with clear procedures and guidelines in place and be able to provide clear information on how you do this and comply with applicable health and safety, wellbeing and security laws and regulations.

Ethics

Suppliers should be committed to respecting human rights and to operate its business with integrity and in an ethical manner including the following aspects:

- **Business integrity** – Suppliers should not practice or tolerate any form of corruption, extortion or embezzlement and should not offer or accept bribes or other unlawful incentives to or from their business partners.
- **Privacy & Intellectual property** – Suppliers will safeguard and make only appropriate use of confidential information whilst ensuring all employees and business partners privacy rights are protected.
- **Identification of Concerns** – Suppliers should provide means for their employees to raise concerns in a confidential manner without fear of retaliation in any form, including, without limitation, concerns about workplace safety, forced labour, wage and hour issues, corruption, and any other potential misconduct or violation.
- **Freedom to Terminate Employment** – Employees / workers must have the right to terminate their employment freely, subject to statutory/contractual notice periods, without the imposition of any improper penalties.
- **Recruitment** – Suppliers should ensure that they are using reputable employment / recruitment agencies when recruiting employees or workers, and must ensure that they hold the necessary licences and registrations.

Ongoing Improvements

PAG is committed to maximising positive impact, also through our supply chains, based on a collaborative approach with our suppliers. We will continue to evaluate and monitor the performance of suppliers as set out in this Supplier Code of Conduct and seek a collaborative solution where required and expect our suppliers to prevent, address and remediate any such non-compliances.

Suppliers should raise any concerns, suspected misconduct or irregularities directly with their contact at PAG. Any concerns raised, be it with the Supplier or a third party will be in confidence and PAG assures it will be handled as such.

PAG provides training to all its staff relating to the Modern Slavery Act 2015 and would expect Suppliers to establish appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of the contents of this Supplier Code of Conduct, the applicable laws, regulations and recognised standards.