

## 1. DEFINITION OF SUPPLIER

“Supplier” shall mean: any supplier of materials, products or components; subcontractors; consultants; recruitment agencies; IT providers; professional services firms: accountants; banks, lawyers and solicitors and any other third party with whom we may enter into an agreement or that may act on our behalf.

## 2. PURPOSE

NKS is committed to maintaining ethical business practice that’s driven by honesty, mutual respect and collaborative behaviours that encourage competition and fair trading to the highest possible standards of corporate governance and responsibility. Our policy is not merely to comply with the letter of laws or regulations, but rather to instil and maintain a true culture of compliance wherever we do business. We therefore expect that all suppliers, in all directions of our supply chain, will embrace this spirit of commitment and integrity.

This Supplier Code of Conduct policy incorporates the same standards of ethical conduct and integrity as with our own conduct and ethical standards. Suppliers are requested to adhere to this code and to remain mindful that their activities may have an influence on our reputation and relationship of trust with customers, employees and stakeholders alike.

## 3. APPLICATION

Suppliers shall ensure that all their representatives (including employees, agents, suppliers and subcontractors and collectively referred to as “the Supplier”) conduct business with and/or on behalf of the NKS in accordance with this policy.

## 4. COMPLIANCE WITH THE LAW AND REGULATIONS

The supplier has an unqualified responsibility to comply with all applicable laws and regulations in the countries in which they operate. The specific areas of compliance highlighted for attention in this document shall not be considered fully definitive.

In selecting suppliers, we work hard to choose reputable business partners that evidence and demonstrate their commitment to ethical standards and business practices comparable to our own.

We are committed to helping our suppliers to comply with these standards and in turn we expect our suppliers to apply these standards to the suppliers that they work with.

## 5. ANTI-BRIBERY AND ANTI-CORRUPTION

Suppliers must comply with anti-bribery legislation and avoid all forms of corruption. Suppliers must not offer or accept anything of value to secure an improper advantage or benefit. The supplier shall not offer or accept, either directly or indirectly, bribes or payoffs in cash or any other form.

We expect our suppliers to implement appropriate and adequate procedures for their employees to comply with applicable anti-corruption laws and these standards

## 6. GIFTS AND HOSPITALITY

NKS has developed long-term business relationships in all directions of our supply chain and with all clients based on mutual trust and respect. Exchanging gifts and hospitality can build goodwill, but may, or may appear to, create improper influence. Any gift or hospitality we accept or give in respect of our business should always be customary and reasonable in terms of frequency and value.

Suppliers should not provide any gift, meal or entertainment to an employ of the company that might otherwise be considered to influence, or appear to influence, an employees’ decision in relation to the supplier. In other situations, suppliers may provide modest gifts, meals or entertainment to company employees if they are:

Consistent with customary business practice and supplier company policy:

- Do not contravene the law
- Not frequent or expensive

Equally we do not wish our suppliers to be influenced or pressured through the acceptance of inappropriate gifts or hospitality. If someone tries to do this, please let us know.

### 7. RECORD ACCURACY AND RETENTION

The supplier shall ensure that business records pertaining to NKS are retained for the period required by law, and that they accurately and fairly reflect all business transactions. Disposal shall be performed with adequate attention to the confidentiality of the information concerned.

### 8. DATA PROTECTION

The supplier shall ensure compliance with laws and directives providing for the protection, transfer, access and storage of personal information in line with the General Data Protection Regulations (GDPR) in the UK.

### 9. CONFIDENTIAL INFORMATION

Information that has value to us and is not publically available is considered confidential. All suppliers and employees have a responsibility to keep confidential information safe and confidential. Suppliers should also protect personal privacy and comply with all applicable privacy laws.

A standard Non-Disclosure Agreement must be signed between NKS and supplier or prospective supplier prior to discussing any confidential information. The supplier shall not utilise or disclose to NKS confidential information and vice versa. This includes, but is not limited to, customer information, supplier information, knowledge of business plans or projections, sales or marketing programmes and customer lists or any other such information.

### 10. FAIR COMPETITION

NKS believes in vigorous yet fair competition and supports the development of appropriate competition laws. The Supplier shall not engage in collaboration or other activity that reduces competition.

### 11. SECURITY, HEALTH AND SAFETY

We expect our approved suppliers to maintain good practice in respect of information security and the health, safety and wellbeing of people that encounter their business activities. The supplier shall ensure that it adheres to our policy and procedures in this regard while in attendance at our customer sites, and in accessing our systems or information where applicable.

### 12. PROMOTING SUSTAINABLE DEVELOPMENT

NKS recognises the role that all businesses have in respect of promoting sustainable development.

We believe that that business must accept the responsibility to ensure that growth is achieved in a sustainable manner, promoting socio economic

development to try to tackle poverty whilst protecting and enhancing quality of life and avoiding detrimental impacts on any part of communities, society or environment.

We therefore also look to our approved supply chain partners as a key area to promote good sustainable business practices with the aim for contributing to sustainable development in all applicable aspects of their operations.

### 13. ENVIRONMENTAL LEGISLATION AND EU DIRECTIVES

The supplier shall act responsibly towards the environment and provide data on the environmental footprint of their business operations if so asked. The supplier is encouraged to adopt the principle of continuous improvement regarding the environmental sustainability of its products and services, and as such we are keen to learn about relevant developments from the supplier and to share experience in this area.

### 14. REPORTING BREACHES OF THE CODE

The supplier is expected to self-monitor its compliance with this Code. In the first instance, known or potential breaches should be reported to the company's procurement contact. If the supplier believes that it is inappropriate to raise a concern to Procurement, it may report it directly and in confidence to: The Board of Directors, NKS Contracts Ltd, 6 The Old Coachworks, Kingsfield Lane, Longwell Green, Bristol BS30 6DL.



Nick Smith  
Managing Director  
**NKS Contracts Ltd**

1 April 2023

SUPPLIER CODE OF CONDUCT POLICY

DOCUMENT REVISION TABLE

SECTION	RELEASE/ AMENDMENT SUMMARY	VERSION	DATE
All	Initial document issue	/v1	1 April 2019
	Annual review	/v1	9 April 2020
	Annual review	/v1	9 April 2021
	Annual review	/v1	9 April 2022
	Annual review	/v1	9 April 2023