



**DALCOUR
MACLAREN**

SUPPLIER CODE OF CONDUCT

Last updated: 4 March 2025

Supplier code of conduct

Welcome to our supplier code of conduct. We value our partnerships and believe in building a sustainable, responsible, and ethical supply chain. Our core values describe what we stand for and guide our behaviour. They set the tone and shape the culture of Dalcour Maclaren.

Working with all our stakeholders, including our supply chain, we follow principles of sustainability, equality and accountability in all our actions.

Our code of conduct sets out our expectations and fundamental principles which we expect you to extend into your business and your own supply chain. We expect you and your supply chain to act in accordance with the highest ethical standards and comply with all relevant laws and regulations.

Compliance with laws & regulations

Suppliers must comply with all applicable local, national and international laws and regulations, including labour, environmental and anti-corruption laws.

Respecting human rights and combatting modern slavery

As a minimum, we expect:

- Employment is freely chosen
- Safe and hygienic working conditions
- No use of child labour
- Living wages are paid
- No excessive working hours
- No discrimination
- No harsh or inhumane treatment
- A full understanding of your business operations and wider supply chain
- Ensure a workplace free of harassment and discrimination
- That any potential human rights and modern slavery risks are assessed, managed and mitigated
- Compliance with the requirements of relevant modern slavery acts

Health & safety

Suppliers must comply with all applicable health and safety laws and regulations. Dalcour Maclaren (DM) expects suppliers to adopt practices to minimise health and safety risks, support accident prevention and ensure a safe workspace for all workers.

Protecting the Environment

We expect all our suppliers to support our Net Zero commitments and actively work towards making a positive impact on environmental factors, especially those linked to our operations. Suppliers must as a minimum adhere to environmental laws and regulations, implementing practices to minimise environmental impact.

Ethical Business Practices

Suppliers must conduct business ethically, with integrity and transparency. Conflicts of interest and insider trading must be avoided. We expect our suppliers to have reporting channels in place so employees can raise concerns about inappropriate business practices or unethical behaviour and have processes in place to protect employees who raise concerns which includes protecting their identity.

1. Gifts and entertainment

Suppliers must not offer or accept any gift to obtain improper advantages or influence for the Supplier, DM, or any third party. Gifts include a benefit, fees, commissions, dividends, cash, gratuity, services, or any inducements.

2. Bribery and anti-corruption

Suppliers must fully comply with requirements of all applicable bribery and anti-corruption laws.

Data privacy and security

DM requires Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of DM should only be used, accessed, and disclosed as permitted by the Supplier agreement.

Monitoring and Compliance

Suppliers agree to regular audits and assessments to ensure compliance with this code of conduct. Non-compliance may result in the termination of the business relationship.

Acknowledgement

Suppliers must acknowledge and agree to comply with this code of conduct.

Contact

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