

Supplier Code of Conduct



Together

We are **Clemark Group**,

Registered in England & Wales under **Associate Enterprises Limited** and including all wholly owned subsidiaries. We also trade as Assent, Lorators, Clemark.

Our integrated management system covers the provision of consultancy, auditing, training, creative, technology and other professional services delivered in-person and remotely to ensuring the quality of products/services and the security of all information.

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1. Introduction

This Supplier Code of Conduct (“Code”) sets out the minimum standards expected from all suppliers, contractors, and business partners (“Suppliers”). It reflects our commitment to ethical business practices, human rights, health and safety, environmental stewardship, and compliance with applicable laws.

Suppliers are required to comply with this Code and ensure that their own suppliers and subcontractors adhere to similar standards.

2. Providing Opportunity for All

Suppliers shall promote equal opportunity and fair treatment in all aspects of employment. Employment decisions must be based on merit, qualifications, and business needs. Suppliers must foster inclusive workplaces that respect diversity and prohibit discrimination.

3. Human Rights

Suppliers shall respect internationally recognised human rights and ensure they are not complicit in human rights abuses. If suppliers suspect there to be human rights breaches in their own supply chain, they must report them through the appropriate channels without delay.

3.1 Anti-Slavery

Suppliers must prohibit all forms of modern slavery, including forced, bonded, or involuntary labour. Employees must work voluntarily and be free to leave upon reasonable notice.

3.2 Child Labour

Suppliers must not employ individuals below the legal minimum working age. Where young workers are employed, work must not interfere with their education or harm their development.

3.3 Working Hours

Working hours must comply with applicable laws and industry standards. Overtime must be voluntary and not excessive.

3.4 Wages and Benefits

Suppliers must provide wages and benefits that meet or exceed legal requirements, including minimum wage, overtime pay, sick pay, maternity leave, and other required statutory benefits.

3.5 Humane Treatment

Suppliers must treat all workers with dignity and respect. Harassment, abuse, coercion, or intimidation of any kind is prohibited.

3.6 Non-Discrimination

Suppliers must not discriminate based on race, gender, age, religion, disability, sexual orientation, or any other protected characteristic under the Equality Act 2010. If suppliers or their employees suspect there to be discrimination present in their operations or supply chain, they must report it through the appropriate channels without delay.

4. Health & Safety (H&S)

Suppliers shall provide a safe and healthy working environment at all times.

4.1 Occupational Health & Safety

Suppliers must identify, assess, and control workplace hazards and implement appropriate safety measures. Physical and mental wellbeing support must be openly available to all staff, and reasonable adjustments must be provided where individuals require them.

4.2 Effective Housekeeping

Workplaces must be maintained in a clean, orderly, and safe condition to prevent accidents, injuries, or other impacts to physical and mental health. This must include lighting, noise, temperature, and fresh airflow.

4.3 Emergency Preparedness

Suppliers must establish emergency procedures, including evacuation plans, fire safety measures, and regular drills. Business Continuity Plans must be in place, tested regularly, and effective to ensure the continuation of operations and employment where practicable.

4.4 Injury and Illness Reporting

All workplace injuries and illnesses must be recorded, investigated, and corrective actions implemented.

4.5 Training and Competence

Employees must receive adequate health and safety training and be competent to perform their roles safely.

5. Environmental Responsibility

Suppliers shall operate in an environmentally responsible manner at all times.

5.1 Compliance with Legislation, Permits, and Reporting of Incidents

Suppliers must comply with all applicable environmental laws, regulations, and permits. Environmental incidents must be reported to the appropriate authorities without delay.

5.2 Carbon and Emissions

Suppliers should measure, monitor, and reduce greenhouse gas and other impactful emissions and air pollutants. Where practicable, Carbon Footprint Reporting should be conducted regularly.

5.3 Waste Management

Suppliers must minimise waste, promote recycling, and dispose of waste responsibly in accordance with regulations. Where suppliers are responsible for the carriage and responsible disposal of 3rd party waste, the appropriate licenses, duty of care, and records must be in place.

5.4 Sustainability

Suppliers are encouraged to adopt sustainable practices, including efficient use of resources and reduction of environmental impact. This must include ethical and responsible practices in their suppliers, packaging, operations and other relevant aspects.

6. Ethics

Suppliers shall conduct business ethically and with integrity at all times.

6.1 Anti-Bribery

Suppliers must not engage in bribery, corruption, or any form of unethical inducement. Staff must receive ethical conduct and anti-bribery training on a regular basis.

6.2 Disclosure of Information

Suppliers must provide accurate and truthful information regarding their business, financial condition, and performance. Information must be publicly available where required.

6.3 Fair Business, Advertising, and Competition

Suppliers must uphold fair competition laws and ensure that advertising and marketing practices are truthful and not misleading.

6.4 Data Privacy

Suppliers must respect individuals' privacy rights and handle personal data responsibly. Any websites operating under the supplier's brand and responsibility must be GDPR compliant, including a published Data Privacy Policy, Cookie Notices, and easily identified Cookie "Opt-Out" processes.

6.5 Data Protection

Suppliers must implement appropriate technical and organisational measures to protect data against unauthorised access, loss, or misuse. This must include appropriate training for staff.

6.6 Data Processing

Suppliers must process personal data only for legitimate purposes and in accordance with applicable laws and contractual obligations.

6.7 Data Subject Access Requests

Suppliers must support and respond appropriately to data subject access requests in line with legal requirements.

6.8 Issue Reporting, Investigation, and Resolution

Suppliers must establish mechanisms for reporting concerns or violations. Reports must be investigated promptly, and appropriate corrective actions taken including reporting to the ICO where appropriate.

7. Compliance and Monitoring

Suppliers must maintain documentation demonstrating compliance with this Code and allow audits or assessments upon request.

When requested, suppliers must provide evidence of compliance with the requirements of this code of conduct in a timely manner and without delay.

8. Acceptance

Suppliers are required to acknowledge and comply with this Code as a condition of doing business.

Name: _____

Company: _____

Signature: _____

Date: _____