

Supplier Code of Business

About Alderley

At Alderley, we place business integrity and professional corporate governance at the heart of business. Key to this is ensuring that our network of Suppliers have in place policies and procedures that maintain standards at least equal to those maintained by Alderley.

This Supplier Code of Business (Supplier Code) is supplemental to our Code of Business which includes the need for suppliers and third parties providing goods and services to Alderley, or to any of our valued customers, to have strict compliance procedures in place.

Our Supplier Code applies in respect of each and every country or territory in which a supplier carries on its business.

The provisions of this Supplier Code are in addition to the terms and conditions referenced in the relevant purchase order. They do not operate to vary any provision of the terms and conditions or any other specific provision of the purchase order.

Compliance with applicable laws

As a Supplier to Alderley you must comply fully with the applicable laws and regulations of the country or countries in which any goods or services are manufactured and/or delivered.

Human Rights

Suppliers must treat people with respect and dignity, and promote equality of opportunity wherever practicable.

As a company headquartered in the United Kingdom, Alderley complies with and requires full compliance with the requirements of the UK Modern Slavery Act 2015. The Alderley Modern Slavery Statement can be found on the group website - [Modern Slavery Statement](#)

Unlawful child labour

Suppliers must take all appropriate steps to eliminate unlawful child labour from its supply chain. All employees must be at least the lawful minimum age for performing the role as defined and set out by the International Labour Organisation.

Human trafficking, modern slavery and unacceptable working practices

Suppliers must take all necessary steps to eliminate unfair working practices which include the use of indentured or bonded labour. Suppliers must also ensure that the risk of modern slavery and human trafficking is minimised within their supply chains. Specifically, Suppliers should have in place appropriate contract management to address any issues that may present themselves within their supply chain.

Suppliers working hours will not exceed the maximum, if any, set by local law. Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and any legally mandated benefits. Suppliers will compensate workers for overtime consistent with applicable local law. Suppliers will not tolerate harsh or inhumane treatment, whether mental or physical.

Equality and diversity

We expect our Suppliers to actively support equality and diversity in the workplace and to have in place appropriate policies and procedures to address any allegation of harassment or discrimination.

Anti-corruption

Suppliers must comply, specifically, with the UK Bribery Act 2010, the Alderley Anti-Bribery Policy (which can be found on the Alderley website - [Anti-Bribery Policy](#)) and with all relevant anti-corruption and bribery laws, in the countries in which they operate and carry on any business.

Suppliers must have in place appropriate commercial procedures and must practice due diligence, to eliminate the risk of corruption within its business practices including within any joint ventures, partnerships or any third-party relationships.

Bribes and illegal/improper payments

Suppliers must not offer gifts or make any improper, illegal or facilitation payments (intended to expedite performance of a routine action) to a government official, holder of a public office, customer, supplier, agent or any other third party.

Suppliers must not accept any payment, gift or hospitality from a third party if it is offered or provided with an expectation that a business advantage will be provided by its acceptance. This is strictly prohibited and this prohibition shall apply whether or not this was the direct or indirect intention of the relevant parties.

The prohibition of bribes and facilitation payments shall apply in countries where local law does not expressly prohibit the making or receipt of such payments.

Data, and information and intellectual protection

Information

We require our Suppliers to comply with all applicable laws relating to the processing of personal data within the relevant country and in respect of any transfers of personal data between countries. This shall include, but

shall not be limited to, compliance with all appropriate privacy laws.

Suppliers shall ensure that they have in place appropriately secure systems and procedures that are commensurate at all times with the sensitivity and confidentiality of the personal or business data being processed or transferred.

Suppliers shall take all steps necessary to protect the business information and data of Alderley from any data loss, modification, disclosure or other compromise as a result of an unauthorised access by a third party. This shall include, but shall not be limited to, having appropriate cybersecurity arrangements in place.

In the event of a supplier experiencing a cyber incident, it is incumbent upon the supplier to promptly inform Alderley in the event of any unauthorised access, breach or involvement of digital information. To contact Alderley, please email helpdesk@alderley.com.

Intellectual Property

Suppliers shall refrain from any activity that may compromise the intellectual property of Alderley in any relevant country whether or not such intellectual property is registered or unregistered.

Minerals sourcing

Suppliers must comply with all applicable laws and regulations regarding conflict minerals.

Conflict minerals include: Tin, tungsten, tantalum and gold.

Where any product supplied to Alderley includes a conflict mineral, the Supplier shall have in place processes to ensure that their manufacture or supply will not directly or indirectly support or finance any terrorist or armed group, any group which perpetrates serious human rights abuses or any organised crime group.

Suppliers must ensure that they can complete a Conflict Minerals Declaration where requested.

Health and Safety

Suppliers must be committed to providing a safe and healthy workplace and conducting operations in compliance with all applicable health and safety laws and regulations. Where appropriate, suppliers must understand and comply with all applicable laws governing product safety and quality.

Suppliers must have procedures and systems in place to prevent, manage, track and report occupational injuries and illnesses.

Environment

Suppliers are required to comply with all applicable environmental laws, regulations and standards. Suppliers must minimise any adverse effects on the

community, environment and natural resources, while safeguarding the health and safety of the public. Suppliers must ensure its operations comply with all laws related to air emissions, water discharges, toxic substances, and hazardous and non-hazardous waste reduction and responsible disposal.

Counterfeit parts and fake certification

Alderley Suppliers shall have in place all necessary procurement and quality processes to prevent the supply to Alderley (or any customer of Alderley) of counterfeit parts or fake certification.

Sanctions


Suppliers shall ensure they conduct their business in compliance with all applicable international sanctions regimes, and that they do not engage with nor source their materials from any sanctioned territories, entities or individuals.

Suppliers shall not undermine trade sanctions by engaging in trade circumvention practices. Suppliers shall have in place strong due diligence procedures to ensure they comply with all sanctions regimes.

Reporting concerns

Alderley encourages anyone with questions or who may be aware of a violation of this Supplier Code of Business to report such misconduct immediately. To report a concern, please send an email through to whistleblowing@alderley.com.

Dated:



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Philippa Slatter
Alderley plc Director