



Supplier Code of Conduct

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1. Purpose and Scope

- 1.1 Eversholt Rail Limited and its affiliates (together, the **Group**) work with a range of product and service providers (**suppliers**) who meet its standards and quality requirements. The Group strongly encourages sound sustainability practices amongst its suppliers. These sustainability practices comprise environmental, social well-being and governance practices.
- 1.2 The Group is aware of the broader influence it has and therefore has developed this Supplier Code of Conduct (the **Code**) as a guide to its suppliers and to encourage compliance with items in the Code so as to bring broader improvements in sustainability practices, both for the Group and its suppliers.

2. Approach

- 2.1 The Group seeks to work with its suppliers to encourage improvements in sustainability standards and practices, whilst respecting local traditions, cultures and norms.
- 2.2 The Group's suppliers are expected to disseminate and educate the requirements of this Code to their employees, agents, sub-contractors and suppliers, and hold them accountable for any non-conformance acts.
- 2.3 The Group also encourages and expects its suppliers to periodically assess themselves and their own suppliers for conformance with this Code, and communicate their conformance status to the Group when requested. If non-conformance with this Code is detected, the Group will attempt to work with its suppliers to correct the situation. The Group would expect the supplier concerned to develop a corrective plan to bring its operations into Code conformance. If a supplier does not develop such a plan or fails to implement it, the Group may escalate its concerns as it deems necessary.
- 2.4 The content of this Code has been developed taking into consideration the rights and freedoms conferred on individuals by UK law, including, without limitation, the Human Rights Act 1998, the Modern Slavery Act 2015, the Bribery Act 2010, Corporate Criminal Offence legislation and the UK's obligations under the International Labour Organisation's 1998 Declaration on Fundamental Principles and Rights at Work (as such may be amended or replaced from time to time).

3. Promoting Ethical Standards

- 3.1 The Group encourages its suppliers to act in accordance with the highest standards of ethical conduct and professionalism. In addition to these standards, the Group reiterates the importance of being compliant with all applicable laws and standards and to avoid all forms of corruption and bribery. In particular, the Group's suppliers are required to implement anti-corruption policies and programmes, and to verify that such policies and programmes are complied with.
- 3.2 The Group also encourages its suppliers to establish their own policies, practices and systems to ensure the promotion and dissemination of their own codes of conduct, where available, within their operations.

4. Protecting the Rights of All Employees

- 4.1 To safeguard the rights and dignity of employees, the Group encourages its suppliers to abide by the standards detailed below:
 - a) Ensure a fair and equitable workplace environment that is free from any form of harassment or discrimination based on but not limited to age, race or ethnic origin,

disability, gender, nationality, marital status, sexual orientation, political convictions or union affiliation.

- b) Provide a work environment that is safe, and which minimises any health hazards or harm to employees.
- c) Prohibit the use of forced, prison, bonded and child labour as well as any form of slavery or human trafficking, and remain in compliance with all applicable minimum age legislation.
- d) Abide by any legislation governing minimum wage payments, and where none is available, ensure that salaries are commensurate with experience and industry standards.
- e) Comply with regulation or legislation, where it is applicable, on maximum working hours.
- f) Implement clear, uniformly applied disciplinary practices and grievance procedures that include provisions prohibiting corporal punishment, including mental, physical or verbal abuse.
- g) Ensure that employees are provided with freedom of association and the right to collective bargaining. Where no such legislation on collective bargaining exists locally, appropriate channels should be made available for discussion and recourse on labour related issues.

5. Operating Responsibly

- 5.1 The Group encourages its suppliers to consider the risks posed to their operations from climate change and to actively mitigate their environmental impacts. It also reiterates to its suppliers the value brought to business in terms of more efficient resource consumption and monitoring of wastage.
- 5.2 The Group invites its suppliers to emulate the standards, practices and principles outlined below:
 - a) Abide by all relevant environmental legislation and regulations, in a manner that ensures environmental preservation.
 - b) Minimise the consumption of energy and carbon footprint from operations, to the extent reasonably practicable, through the implementation of sustainable environmental policies and environmental management systems.
 - c) Encourage the use of environmentally friendly technology that can reduce energy consumption and reduce reliance on resources such as paper.
 - d) Expand the use of environmentally friendly, recycled and/or sustainably forested materials and products in operations.
 - e) Promote the recycling of waste while taking the necessary precautions to ensure compliance with applicable legislation on the handling or disposal of any hazardous materials in operations.