

## **Connells Group Supplier Code of Conduct ('Code')**

Connells Group comprising Connells limited and its subsidiary companies is the UK's largest, most successful and most profitable high street estate agency and property services provider in the UK.

We are committed to operating our business with high ethical standards. This Code sets out our expectations of suppliers, contractors, referral partners and others we conduct business with and their supply chain, collectively referred to as '*Suppliers*'.

We require all of our Suppliers to operate in accordance with this Code and by providing any goods or services to a Connells Group company, a Supplier is deemed to have accepted this Code.

All Suppliers are expected to self-monitor their compliance with this Code and to inform us of any non-compliance. They must also ensure their supply chain are required to follow this Code.

We may ask for information to assess compliance with this Code at any time, including by way of audit. As part of our Supplier Framework and on-boarding process we will carry out due diligence checks and, where appropriate, we may ask for questionnaires to be completed and annual evidence of adherence to this Code.

Any Suppliers not meeting this Code will be subject to measures which may include termination of any agreement and non-payment of invoices.

This Code will be updated from time to time.

### **1. Standards of conduct**

We expect all Suppliers to conduct themselves in a professional, respectful manner to our customers and our staff.

### **2. Laws and regulations**

Suppliers must comply with all laws and regulations applicable to their business operations in the countries in which they operate, and seek similar ethical operational commitments across their own supply chains.

### **3. People**

#### **a. Equal opportunities, discrimination and harassment**

We expect our Suppliers to partner with us to achieve excellence in equality, diversity and inclusion and to actively support the following in their own business and supply chain and to include employees, job applicants, customers and suppliers:

- Treat everyone with dignity and respect.
- Promote an environment free from discrimination, harassment and victimisation.
- Encourage equal job opportunities and fairness for employees and job applicants in the workplace.
- Minimise the risk of discrimination because of one or more of the nine protected characteristics under the Equality Act 2010 - age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- Promote diversity by valuing differences whether, for example, because of race, age, religion or sex.
- Manage fairly the need for different working patterns, including flexible working.

**b. Modern slavery**

Suppliers, whether or not independently required, must comply with the Modern Slavery Act 2015 and any similar laws in the countries in which they operate. Connells expects our Suppliers to:

- Respect workers' human rights and comply fully with all applicable laws.
- Undertake appropriate due diligence into their own supply chains and business partners; and
- Ensure that any contracts with sub-contractors have similar obligations.

**c. Health and safety**

Our Suppliers must provide a safe and healthy workplace for employees, customers and visitors and maintain working conditions to a high standard, and in accordance with all applicable occupational health and safety laws and regulations. Our Suppliers shall look to continuously improve standards of health and safety which will lead to the avoidance and reduction of risks.

**d. Speaking up**

If you have a serious concern that something may not be consistent with this Code, please speak up. We encourage Suppliers to raise any concerns or questions you have in confidence, and we value the information that you can provide.

How to raise your concern: Generally, you should first discuss the matter with senior management within your organisation, who in turn should feel confident to raise it with Connells senior management.

**4. Business practices**

**a. Conflicts of interest**

We want all of our business decisions to be made fairly and objectively. We expect Suppliers to have in place and maintain policies and procedures to manage conflicts of interest and to adhere to best practice.

Suppliers should immediately disclose to us any potential conflicts of interest, particularly if there are any economic interests between the Supplier and any of our employees or contractors.

**b. Fair competition**

Suppliers must avoid practices that may be viewed as anti-competitive, for example sharing confidential or commercially sensitive information with our competitors or other Suppliers to Connells.

**c. Financial crime, bribery and corruption**

We have a zero-tolerance approach to financial crime including tax evasion, bribery and corruption in any form, and Suppliers must behave the same.

Procedures under the Bribery Act 2010 and Criminal Finance Act 2017 are required in order to ensure compliance with the relevant requirements and enforce them where appropriate.

Suppliers should immediately report any concerns in relation to financial crime, bribery and corruption to their Connells contact, as well as through their own company's whistle-blowing process.

**d. Supplier entertaining, incentives and gifts**

We want to protect our employees and our company from bribery or potential bribery.

It is important to ensure that no employee acts in any way that could create a sense of obligation by accepting gifts or personal hospitality. Recognising that this policy needs to be proportionate and adhere to applicable law, Connells also deems some form of small promotional gifts and certain corporate entertainment to be a legitimate part of business life.

We expect our Suppliers to:

- Respect that Connells employees must not receive excessive or inappropriate entertainment and may only accept gifts of modest value;
- Have appropriate controls in place so that any gifts or entertainment offered or provided comply with applicable law and are not bribes or perceived to be bribes; and
- Ensure that no offers of gifts or hospitality are made during a tender process or contract renewal period.

## **5. Protecting information and property**

### **a. Data, Privacy and Intellectual Property**

Suppliers must safeguard and use confidential information appropriately, and in accordance with applicable laws including data privacy. They must ensure that all employee, customer, and business partners' data, privacy, and intellectual property rights are respected.

### **b. Information Security**

Suppliers must have appropriate controls in place to manage the risks to proprietary information, particularly customer and other highly critical data.

Any use of or access to any Connells premises, equipment, networks and systems is subject to compliance with any particular policies and requirements notified to the Supplier.

## **6. Training**

Connells also require our Suppliers to provide regular and relevant training to their staff and suppliers and providers.