

Supplier Code of Conduct

ORIIUM Policy Document

Version 1.6

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Information Security

ORIIUM recognises that information and the associated processes, systems and services are valuable assets to the company. ORIIUM also acknowledges that the management of data has important implications for employees and other individuals associated with the company.

Summary Statement

ORIIUM is committed to high standards of, amongst others, environmental sustainability, human rights, antibribery and corruption, integrity and business security. We anticipate that all of our suppliers will abide by similar standards as detailed below and conduct their business in an ethical manner. As a minimum suppliers should comply with all applicable local, national and international legislation.

Human rights, equality and diversity

ORIIUM believes in fairness, equality and, above all, values diversity.

We expect our suppliers to:

- comply with all relevant legislation including the Human Rights Act 1998 and the Equality Act 2010
- respect the personal dignity, privacy and rights of all individuals, including your employees and those in your supply chain
- not tolerate discrimination on the basis of gender, age, disability, race, religion, sexuality, social class or in any other way
- ensure equal opportunities are available to all
- understand diversity through inclusion of all people, regardless of age, disability, gender, racial origin, religion, belief, sexual orientation, language

Fair employment practices & conditions, slavery, human trafficking and child labour

ORIIUM is committed to ensuring that employment is freely chosen, child labour shall not be used, and no harsh or inhumane treatment will occur.

Our suppliers are expected to (and must ensure that their supply chain shall):

- respect the rights of employees to freely associate and bargain collectively
- not use any forced labour or involuntary prison labour and allow all employees the choice to leave their employment freely upon reasonable notice
- not force the relocation or movement of any workers
- not use or promote forced or child labour in any way
- understand that all staff are entitled to work in an environment which respects their personal dignity and take steps to ensure that the working environment is free from harassment, bullying or any other type of intimidation

Health and safety

ORIIUM aims to provide each employee with a safe working environment. We expect our suppliers to:

- ensure that all operational locations meet, as a minimum, all local health and safety regulations
- ensure all employees are appropriately trained and aware of all health and safety risks
- procedures within their working environment
- record all accidents and/ or near misses and investigate these to determine if preventative action is required to prevent further accidents

Environmental sustainability

ORIIUM believes that it has a responsibility to identify and manage activities which affect the environment and we are committed to continually improving the environmental impact and sustainability of our business.

We expect our suppliers to:

- minimise the environmental impacts of existing operations and ensure that the environmental impacts of new operations are assessed

- minimise waste and maximise recycling through the reuse and reconditioning of devices and other materials
- make a responsible effort to minimise the use of packaging, reuse where practicable and avoid, where possible, the use of packaging which consumes a disproportionate amount of energy or resources during the manufacturing process
- introduce programmes which aim to minimise waste
- promote the ownership and control of environmental issues at business level
- conserve energy and minimise carbon emissions, where practicable
- reduce your energy expenditure and increase energy efficiency as much as reasonably practicable especially in relation to lighting, heating, air conditioning and kitchen appliances (including water conservation)

Business Continuity and Disaster Recovery

- The Supplier shall ensure that it has in place and is able to implement the provisions of a business continuity plan for the continued provision of the Services
- The Supplier shall maintain, regularly review and update the Business Continuity Plan
- The Supplier shall regularly test the business continuity procedures

Anti-Bribery, corruption and anti-competitive practices

ORIIUM adopts a zero-tolerance approach towards bribery, fraud and corruption and is committed to the highest levels of ethical conduct and integrity in business activities. We expect our suppliers to:

- refrain from and prevent any and all forms of corruption, extortion and bribery in accordance with the Bribery Act 2010
- ensure that appropriate prevention procedures are in place to mitigate the risk of tax evasion and to comply with the provisions of the Criminal Finance Act 2017
- apply this policy to all employees and directors and to temporary workers, consultants, contractors, agents and subsidiaries acting for and on behalf of our suppliers

- understand that it is the responsibility of all employees and associated persons to assist in the prevention, detection and reporting of bribery, corruption and/or fraud;
- ensure all employees are aware of who to report and any concerns they may have, and encourage them to do so
- ensure new business is procured in a responsible manner
- ensure employees make the relevant person aware of any conflict of interest they may or suspect they may have
- not partake in any anti-competitive practices, including colluding with peers, suppliers or any other parties with the aim of influencing pricing, bid rigging, participating in or being involved with a cartel, or any other practice which is intended to or which has the effect of reducing free competition in any market place

Secure business

ORIIUM is committed to maintaining the highest levels of security. We expect our suppliers to:

- implement reasonable measures for minimising exposure to physical security threats such as terrorism, crime, pandemics and natural disasters
- implement reasonable measures for minimising exposure to cyber security threats such as terrorism, crime, viruses (and other malicious code) and hacking
- comply with the Data Protection Act 2018, including ensuring that appropriate technological and organizational security procedures are in place and that any security concerns are reported promptly to the appropriate person; and
- protect all confidential information and intellectual property of others

Privacy / GDPR

ORIIUM requires all suppliers to comply with the EU General Data Protection Regulation which came into force on 25th May 2018 and introduced new responsibilities, including the need to demonstrate compliance and more stringent enforcement than the original UK Data Protection Act. The supplier

should be able to demonstrate that they comply fully with these requirements and can provide a Statement on their GDPR position should this be requested.