



Supplier Code of Conduct

Introduction

Canary wharf Ltd (C.W) is committed to conducting its business in an honest and ethical manner and in compliance with the laws and regulations applicable in the countries in which it operates.

For the purposes of this Supplier Code of Conduct, a supplier is any individual, organisation or company that provides goods or services to CW.

All suppliers are required to review, understand and comply with this Supplier Code of Conduct and notify CW if they become aware of any action which does not comply with this Supplier Code of Conduct. This is a condition of doing business with CW. A breach or other violation of this Supplier Code of Conduct could result in a review or termination of the supplier's contract with CW.

Suppliers may be asked to supply information necessary for CW or its customers to comply with applicable laws and regulations. Suppliers shall cooperate with CW to provide the information requested in a timely and clear manner.

An alleged or actual breach of this Supplier Code of Conduct must be reported to CW and can be reported through our [Speak-up channels](#). CW reserves the right to investigate any alleged or actual breach of this Supplier Code of Conduct and suppliers must not unreasonably refuse to cooperate in any such investigation.

The scope of this Code of Conduct is global and it applies to all suppliers of CW. Any reference to CW includes its subsidiaries and affiliates, including any individual mines that enter contracts with suppliers under their own names.

Principles

Business Ethics and Integrity

We comply with all applicable laws, regulations and standards that are applicable to our business and activities in all countries in which we operate. Our suppliers shall conduct business activities with integrity, including not taking unfair advantage of CW or other parties through misrepresentation of facts or any dishonest practices.

Suppliers are expected to be aware of and comply with all applicable laws, regulations and standards that are applicable to the business and activities of CW and the supplier. Suppliers shall also be aware of and comply with CW's Business Integrity Policy, which includes but is not limited to:

- having a zero tolerance of fraud and corruption in all its forms, including offering, paying, soliciting, receiving or accepting any bribes, kickbacks or other prohibited payments or activities to or from any person
- prohibiting the use of facilitation payments in support of any contracts with CW
- reporting any known or potential conflicts of interest with CW employees
- complying with any confidentiality agreements with CW
- not violating any of CW's intellectual property rights

THIS DOCUMENT IS UNCONTROLLED IN HARD COPY FORMAT			
Document Name	Supplier Code of Conduct		1 of 4
Document Owner	Chief Executive Officer	Last Approved By	AGA Board
Issue Date	1/03/2024	Next Review Date	1/03/2027



- complying with CW's position regarding the giving and receiving of gifts, hospitality, and sponsorships
- complying with all applicable trade sanctions, export controls and anti-boycott laws
- complying with CW's position regarding the treatment of personal information and the requirements of data protection laws and regulations applicable to CW in the countries in which we, or a third-party supplier on our behalf, processes personal information and
- making use of Speak-up channels if a practice that conflicts with CW's values and business principles is suspected or identified.

We require our suppliers to have a comprehensive commitment to prevent fraud and corruption in all its forms, including bribery. This includes, among other initiatives, maintaining an anti-bribery and anti-corruption policy, maintaining whistleblowing mechanisms for internal reporting, and by encouraging any parties that the supplier works with in supplying goods and services to CW to also comply with all applicable laws, regulations and standards to prevent bribery and corruption in all its forms.

Human Rights

Respect for human rights is an essential part of CW's vision and values. It is fundamental to our value of treating each other with dignity and respect. We are committed to the United Nations Guiding Principles for Business and Human Rights and we seek ways of honouring the principles of internationally recognised human rights when facing conflicting or unclear requirements. We expect the same from our suppliers.

We expect our suppliers to respect the human rights of all our stakeholders, including the rights of Indigenous peoples and vulnerable groups, and to respect the values, traditions and cultures of the local and Indigenous communities in which we operate. Suppliers must engage with potentially affected rightsholders, consider their views when developing mitigation actions and, where impacts cannot be avoided, address those impacts through appropriate remediation.

In striving to ensure respect for human rights, suppliers shall take particular care when operating in countries or regions of weak governance or those experiencing conflict or recovering from conflict, to ensure they neither violate human rights, nor are complicit in such violations, have a public human rights policy commitment and conduct ongoing human rights due diligence. We expect suppliers to ensure that their deployment of security forces is aligned with the Voluntary Principles on Security and Human Rights.

Labour

We are committed, and our suppliers are also required to commit, to upholding and promoting internationally accepted labour standards, in particular the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the core International Labour Organisation Conventions.

Our suppliers are required to treat workers fairly and with dignity and respect. Suppliers shall comply with all applicable labour laws, regulations and standards in all countries in which we operate. Suppliers are required to:

- uphold favourable conditions of work, including the rights to freedom of association, collective bargaining, non-discrimination, and equality
- not engage in any use of child, forced or compulsory labour including bonded labour, military or slave labour, forced prison labour, slavery, servitude or human trafficking

THIS DOCUMENT IS UNCONTROLLED IN HARD COPY FORMAT			
Document Name	Supplier Code of Conduct		2 of 4
Document Owner	Chief Executive Officer	Last Approved By	AGA Board
Issue Date	1/03/2024	Next Review Date	1/03/2027



- be committed to equal opportunity and not make employment decisions on the basis of personal characteristics such as gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, or sexual orientation
- prohibit all forms of bullying, violence, harassment, sexual harassment and unlawful discrimination
- investigate and take appropriate action in response to any confirmed breaches of policies, standards and procedures and not tolerate retaliation or adverse employment consequences against those who raise concerns and
- ensure all entities in their supply chain comply with these requirements.

Health and Safety

We are committed to ensuring the health, safety and security of our people and the communities in which we work. Prioritising health and safety is a collective effort. Our suppliers are required to provide working environments that support the health, safety and wellbeing of workers. Suppliers shall have in place health and safety policies that are consistent with all applicable laws, regulations and standards that are applicable to the business and activities of CW and the supplier. Suppliers must have adequate systems and procedures to track, report, manage and prevent occupational injury and illness.

Suppliers are also expected to commit to eliminating work-related injuries and ensuring their workers have the appropriate skills, knowledge and competencies to perform their work in line with our health and safety expectations. Suppliers must ensure that their workers or personnel working on their behalf comply with all CW's health and safety requirements when conducting activities at CW sites.

Environment

We work to deliver sustainable outcomes through responsible management of the natural resources over which we are custodians and by minimising the potential for environmental harm from our activities.

We integrate environmental management into the way we operate and promote environmental responsibility among our employees and business partners. Suppliers shall take a precautionary approach towards environmental challenges, undertake initiatives to promote greater environmental responsibility, encourage the development and diffusion of environmentally friendly technologies, and aim to minimise their environmental impact. Suppliers shall have in place environmental policies that are consistent with all applicable laws, regulations and standards that are applicable to the business and activities of CW and the supplier and any other requirements to which we have committed.

Community

We strive to nurture community partnerships built on trust and expect the same commitment from our suppliers. Our suppliers, their employees and associated entities must treat members of the communities in which they operate with dignity and respect and perform their work in a manner consistent with our standards, the [UN Guiding Principles on Business and Human Rights](#), and the voluntary commitments we have adopted.

Suppliers are required to have in place community policies that are consistent with all applicable laws, regulations and standards that are applicable to the business and activities of CW and the supplier and any other requirements to which we have committed. This includes but is not limited to:

- consulting and engaging with communities and other stakeholders on their activities in a culturally appropriate manner, which respects the values, traditions, and cultures of the local communities, including indigenous peoples, vulnerable and minority groups

THIS DOCUMENT IS UNCONTROLLED IN HARD COPY FORMAT			
Document Name	Supplier Code of Conduct		3 of 4
Document Owner	Chief Executive Officer	Last Approved By	AGA Board
Issue Date	1/03/2024	Next Review Date	1/03/2027



- undertaking community development initiatives in partnership with the communities in which our suppliers operate, and where appropriate, establishing complaints management processes to receive, investigate, and resolve any grievances as expeditiously as possible in line with our grievance mechanisms.

THIS DOCUMENT IS UNCONTROLLED IN HARD COPY FORMAT

Document Name	Supplier Code of Conduct		4 of 4
Document Owner	Chief Executive Officer	Last Approved By	AGA Board
Issue Date	1/03/2024	Next Review Date	1/03/2027