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#### Introduction

This Code of Conduct reflects the principles outlined in our Group Procurement Policy Framework and The Severfield Way, and it will guide us in making decisions on how we conduct business with integrity and purpose.

All activities in this Code of Conduct are aligned with our values, as we make significant investments in goods, services, works, and capital projects, always aiming to manage our company spending responsibly.

Our focus through this Code of Conduct is on building ethical, transparent, sustainable, and fair partnerships with our suppliers; while ensuring we source competitively and create strong, mutually beneficial relationships.

#### The Severfield Way

The Severfield Way is our Group-wide framework that comprises our purpose and company values. Every business or organisation has a purpose – a reason that it exists and what it is there for, that sits at the heart of everything they do. At Severfield, we have a very clear one:

"Creating better ways to build, for a world of changing demands."

Our company values are the things we believe in, and what we stand for as an organisation. They are the principles that guide how go about our everyday work, and they help us fulfil our purpose. They are: We set the bar high, We are in it together, We find better ways, and We do the right thing. We are committed to upholding these values in everything that we do.





#### **Applicability**

This Code of Conduct is applicable to all suppliers, i.e., and organisation that provide goods or services to the Severfield Group. This includes all Severfield business entities and subdivisions.

#### **Supplier Communication**

Where appropriate, suppliers shall communicate the requirements of this Code of Conduct to its employees and suppliers.

#### **Adherence**

Suppliers shall have policies and processes in place to manage and implement this Code of Conduct within their own business.

Severfield reserves the right to request evidence-based information or perform audits to ensure compliance with this Code of Conduct.

In the event of non-compliance, Severfield may seek to terminate the relevant agreement and, as such, this Code of Conduct shall take precedence over any agreement with our suppliers.

By adhering to this Code of Conduct, our Suppliers collectively contribute to make improvements throughout the supply chain, and show a commitment to alignment of common goals.

#### Supplier Concerns

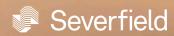
Severfield wishes to encourage effective and honest communication by committing to a robust response to any malpractice brought to its attention.

Details on our whistleblowing policy can be found - <u>Company Policies</u>

#### Review

Severfield will review the Supplier Code of Conduct annually against business goals and objectives and communicate accordingly.

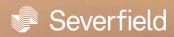




## Sustainable business practices

Principle	Our Commitments	Our Expectations of You
Responsible Sourcing	Severfield supports the responsible sourcing of materials and manages activities in line with the appropriate local laws. We are accredited to BES 6001 and continue to promote the use of sustainable products and services.	Suppliers must procure materials from regulated and trusted sources and make available supporting evidence. We do not expect all our supply chain to be accredited, however, understanding and integration of regulatory policies is encouraged.
Waste Reduction	Severfield is committed to reducing our general and recyclable waste by following the waste hierarchy to reducing, reuse, recycle or recover. Where appropriate we also commit to reduce the use of hazardous materials.	Suppliers should actively encourage the reduction of waste, particularly packaging materials (such as single use materials or plastics) in its operations and within its supply chain.
Environment	In line with our Group Sustainability Policy, Severfield takes responsibility to prevent or minimise its negative environmental impacts (such as the impact on the natural environment and water).	We expect our Suppliers to comply with all applicable regulations and commit to good environmental practices which prevent or minimise their negative environmental impact (such as the impact on the natural environment and water).
Biodiversity	Severfield has taken steps to understand its impact on biodiversity and adhere to regulations surrounding areas of importance or significance to nature.	Suppliers should avoid and minimise activities that harm ecosystems, wildlife, and natural habitats. They are encouraged to create a net positive impact.
Climate Action	Severfield has clear objectives to reach its Net Zero 2040 & 2050 targets, in line with science.	Suppliers must actively work to reduce their carbon footprint in line with global Net Zero 2050 targets. Suppliers may be asked to provide copies of their plans, targets and commitments to decarbonisation as part of ongoing engagement.
Supplier Due Diligence	Severfield has a robust supplier onboarding procedure to ensure thorough due diligence and intend to work only with suppliers that align to our goals and values.	Suppliers should consider its own supply chain carefully and ensure due diligence is carried out to minimise risk and encourage innovation.

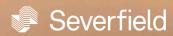




# Safe & Fair Employment

Principle	Our Commitments	Our Expectations of You
Health & Safety	Making work Safer at Severfield: Our reputation relies on high standards of Health & Safety for our employees, our supply chain partners, our customers, and the wider public.	Suppliers must be committed to managing Health & Safety risks and proactively protect the health, safety and welfare of their employees, contractors, visitors, and those in the community who are affected by their activities. Suppliers must comply with the legal occupational Health & Safety obligations applicable to the place of employment.
Labour Practices	In line with our Human Rights Policy, Severfield are committed to respecting and promoting human rights according to the UN Guiding Principles on Business and Human Rights.	Suppliers must be dedicated to respecting and upholding human rights. They are required to maintain a respectful, discrimination-free and harassment free work environment and take proactive steps in their due diligence, comply with relevant laws, and follow best practice in accordance with key international standards on human rights. Please refer to our full policy.
Fair wages & benefits	Employees are fairly awarded for their contribution and skill.	Suppliers must pay minimum wage requirements in line with the applicable law in the country of supplier. Working hours should only be performed in accordance with the local legal requirements.
Modern Slavery	Severfield are committed to ensuring that there is no human trafficking and modern slavery within our supply chain. We will not support or deal with any business we know is involved in modern slavery.	Suppliers must not use any form of modern slavery and must take measures to ensure modern slavery is not present in their supply chain.
Diversity and Inclusion	Severfield promotes diversity in their workforce to ensure equal opportunities for all employees.	Suppliers should also promote diversity in their workplace and encourage employees and suppliers to report discriminatory or violent behaviour.





### Governance & Compliance

Principle	Our Commitments	Our Expectations of You
Ethical	Severfield are committed to undertaking business activities in an ethical manner, adhering to all relevant laws.	Suppliers should behave ethically and honestly at all times in accordance with our Ethics Policy.
Transparency	Severfield engages with its supply chain to ensure communication between clients and suppliers.	Suppliers should provide information about their supply chain, including subcontractors and sources of raw materials.
Exporting	Severfield are committed to compliance with regards to import and export sanctions and laws in the countries in which we operate.	Suppliers must comply with all relevant import and export sanctions and laws, which should also be communicated to their own supply chain.
Fraud and Tax Evasion	Severfield are committed to having effective measures to prevent, detect, and respond to fraudulent activities, including facilitation of tax evasion.	Suppliers must implement effective measures to prevent, detect, and respond to fraudulent activities including facilitation of tax evasion within its own business activities or its supply chain.  Suppliers must report any suspicious activity or potential fraud promptly to us, using our Whistleblowing Policy if appropriate.  Suppliers must cooperate with all investigations related to fraud.
Anti-Bribery	Severfield do not tolerate bribery in any form.	Suppliers must conduct business honestly, fairly and free from bribery or corruption.

