

Supplier Code of Conduct

About this Code

It is our policy at Ampa Group (Ampa) to conduct all of our business in an honest and ethical manner and in compliance with our legal and regulatory obligations. As a certified BCorp, we are committed to ensuring that our business is ethically focused and that we hold ourselves accountable. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate. These core principles are reflected in this Supplier Code of Conduct which establishes the minimum standards and behaviours that must be met by any entity that supplies products or services to us aligned with our Ampa Values.

Scope

This Code applies to all those involved in or with the Ampa supply chain, including agencies, consultants and suppliers and subcontractors providing services to us or any of our affiliates. As a statement of good practice, it should be read both by current and aspiring suppliers to AMPA and by their subcontractors in the supply chain.

This policy sets out the expectations on the following aspects:

- Ethics and Integrity
- Information Security and Data Protection
- People – Inclusion and diversity
- Employment including Health and well-being of employees
- Environment

Related documents

ISMS12	Group Information Security Policy
CMP39	Whistleblowing Policy and Procedure
CMP09	Anti-bribery Policy
CMP44	Modern Slavery and Human Trafficking Policy
CMP50	Procurement Process Guide
CMP49	Procurement Policy
CMP09	Anti-bribery and corruption policy

Glossary

AMPA Group – Any affiliate, brand or associated company of AMPA including Shakespeare Martineau Scotland.

Supplier – Anyone who provides goods or services to AMPA

Review

This Code will be reviewed in the following circumstances:

- Major changes in relevant law or industry practice.
- An opportunity for improvement is identified.
- Changes in our business which impact on this guidance.

Supplier's commitment

The Supplier agrees that:



- It will comply with the requirements in this Code.
- It has appropriate systems in place to ensure continuous compliance and to demonstrate such compliance.
- Any breach of this Code will allow Ampa to terminate its relationship with the Supplier with immediate effect.

Compliance with laws and regulations

Suppliers must operate in compliance with all applicable laws and regulations from time to time in force, including laws and regulations relating to issues addressed in this Code, local and national laws, rules, regulations and requirements in the provision of products and services supplied to Ampa.

In addition, as a supplier to AMPA you will also comply with any contractual obligations policies and procedure supplied to you.

Information Security and Data Protection

Suppliers must protect all information and data received from Ampa or its clients in the course of doing business with AMPA and in accordance with industry recognised good security practices, legislation, regulation and any applicable contractual obligations. As a minimum, suppliers must comply to AMPA information security standards as referenced in ISMS12.

Such information and data must be always kept confidential. All such information and data must be protected from any unauthorised access, destruction, use, modification and disclosure, through appropriate organisational and technical measures and controls.

If any of our suppliers process any personal data on behalf of AMPA or AMPA clients, AMPA expects its suppliers to comply with all applicable data protection and privacy legislation and implement appropriate technical and organisational security measures in accordance with good industry practice regarding any such processing of personal data.

Wherever suppliers are aware of a security and/or data privacy incident or breach that affects or has the potential to affect AMPA or its clients, they must inform AMPA immediately.

Integrity

Suppliers must conduct business in line with all applicable laws and regulations in an open, honest and transparent manner. This extends to identifying conflicts of interest and reporting these immediately to the relevant contact within your firm to allow prompt resolution aligned with your firm's policies and procedures.

Suppliers should not collude with any other supplier or potential supplier within the sector to fix prices, terms and conditions, costs, profit margins or any other collusion criteria. Suppliers are expected to robustly ensure their employees and supply chain comply with the Modern Slavery Act 2015 and all regulatory requirements.

Suppliers must adhere to anti-corruption and financial crime laws, including but not limited to the Bribery Act 2010, Money Laundering Regulations (as amended from time to time), Economic Crime Act, Sanctions legislation, Terrorist Financing and Transfer of Funds Regulations 2017 and anti-competitive practices to ensure integrity in all our dealings, and expect our suppliers to hold a zero tolerance approach to any breaches.

Suppliers will be asked to provide evidence of their policy towards the following:

Environmental responsibility



Ampa has been BCorp certified since January 2023, and take seriously our responsibility to meet high standards of social and environmental performance, transparency, and accountability. Please find here a link to our BCorp certification: [Ampa Holdings LLP - Certified B Corporation - B Lab Global](#).

Suppliers must ensure that their operations comply with all applicable environmental laws and regulations, and where necessary, obtain and maintain necessary environmental permits and licences.

Suppliers must ensure that it uses and monitor resources efficiently, including energy, water and raw materials, and to minimise waste materials through appropriate design, reuse and recycling.

Suppliers must consider their impact on the environment which may negatively impact natural habitats and wildlife.

To aid this, we encourage all our Suppliers adopt an Environmental Policy to ensure all activities are conducted in a sustainable way. As we work towards our Climate Transition Plan, we will ask Suppliers to share with us their carbon footprints, and their own carbon reduction targets.

Labour and Human rights

Workforce issues ethically

AMPA is a certified BCorp and as such is required to meet high standards of social and environmental performance, transparency, and accountability. Activities that make up our BCorp certification include employee benefits, collective action, supply chain practices and climate action.

We expect the highest standard of business ethics from our Suppliers, and they must comply with all applicable human rights and employment laws in the jurisdictions in which they work.

Modern Slavery, Human Trafficking and Child labour

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business and will implement and enforce effective systems and controls to manage this.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

Suppliers must comply with all applicable anti-slavery and human trafficking laws, statutes, regulations from time to time in force including but not limited to the Modern Slavery Act 2015 in any part of its supply chain. This includes, but is not limited to, not supporting or engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour and prison labour.

Child labour

Ampa supports the elimination of child labour and expect our suppliers to ensure no child labour is utilised in their activities or supply chain. Child labour is where any person employed is under the minimum employment age according to the laws of the country where products or services are procured.



Equal opportunities

Ampa is an equal opportunities employer and seeks to work with like-minded suppliers. Suppliers will not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement or any employment practice based on race, caste, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status, disability, union membership or political affiliation or any other characteristic other than a Worker's ability to perform the job subject to any accommodations required or permitted by law.

Discrimination

We believe everyone should have the right to be treated with dignity and respect, and this extends to our supply chain. Inappropriate behaviour, bullying, harassment, sexual harassment or victimisation is not tolerated by Ampa Group and as such, within our supply chain.

Working hours, wages and benefits

We believe everyone should be fairly rewarded and should not work excessive hours, be paid, and have their employment conditions clearly communicated, as such we are a [National Living Wage](#) employer.

Healthy and safety and working conditions

Suppliers will provide workers with safe, healthy and hygienic working environment and will comply with UK health and safety laws and any other relevant laws where it operates.

For suppliers who need to be on-site at one of our locations, you will be required to work in accordance with all AMPA policies and procedures including but not limited to:

[Ampa - Health & Safety Policy](#)

Bribery and corruption

Suppliers must comply with all applicable laws, statutes and regulations relating to the prevention of bribery and corruption (including but not limited to the Bribery Act 2010, Criminal Finances Act 2017 and Economic Crime and Corporate Transparency Act 2023). To that end, the Supplier will not:

- (a) Accept, offer, promise, pay, permit or authorise:
 - (iii) bribes, facilitation payments, kickbacks or illegal political contributions;
 - (iii) money, goods, services, entertainment, employment, contracts or other things of value, in order to obtain or retain improper advantage; or
 - (iii) any other unlawful or improper payments or benefits.
- (c) Engage in any fraud, including any fraud offences listed in Schedule 13 to the Economic Crime and Corporate Transparency Act 2023;
- (c) Evade or facilitate the evasion of tax by another person anywhere in the world.

Unfair business practices

Suppliers must comply with all applicable competition laws (including but not limited to the Competition Act 1998), including, but not limited to those relating to teaming and information sharing with competitors, price fixing and rigging bids.

Due diligence and monitoring



Suppliers must ensure they risk assess third parties and sub-contractors, and carry out the appropriate due diligence. Any third parties or subcontractors must be declared to AMPA at point of engagement. We reserve the right to request evidence of due diligence carried out on subcontractors and third parties.

The supplier will ensure AMPA are provided with all relevant documentation such as, insurance policies, ISO accreditations through the course of our relationship.

Community

We consider the impact of all our activities on our local communities. We encourage our suppliers to do the same and consider how they can contribute to their community's social and environmental development.

Discipline and grievances

The Supplier must provide a grievance mechanism for workers and their organisations to enable workers to anonymously raise workplace concerns.

All suppliers of AMPA will be issued with this Code as part of our onboarding and diligence process.

Compliance and audit

AMPA reserves the right to audit or request evidence of compliance with this Code with prior notice to Suppliers. Suppliers are expected to comply with such requests. We may conduct reviews in line with our external audit schedule and will update our diligence and risk assessment procedures accordingly.

Whistleblowing /Reporting concerns

It is important to us that both Ampa and our supply chain work together to address the requirements of the Code.

Suppliers must monitor their individual compliance with the Code and report any breaches (actual or suspected) as soon as possible to Risk@shma.co.uk

Should you identify, be involved or be asked to breach or potentially breach this code of conduct, then we encourage you to share your concerns with us by emailing within 24 hours of becoming aware.

You are encouraged to report any non-compliance to this policy.

Breach, remediation and termination

As a supplier to AMPA or any of its subsidiaries, it is your responsibility to ensure compliance to this policy. Following a breach of this Code being established, we reserve the right to request a remediation plan or terminate any relationship with any supplier, contractor or other party, should we deem it necessary and appropriate.

