



CP-54

Supplier Code of Conduct

DG-000-D-354

| Issue 1

| 12 Sep 2022

1 Introduction

- 1 The Drumgrange Supplier Code of Conduct is intended to set out the way in which we and our suppliers will behave towards each other. It is not intended to be legally binding, to create any legal obligations or rights or to supersede agreements with suppliers or the rules detailed in our contracts, purchase orders or supplier agreements issued for the purchase of goods and services, which at all times shall take precedence. For the avoidance of doubt, the Supplier Code of Conduct does not take precedence where there is legal or regulatory jurisdiction.
- 2 Our suppliers are selected and evaluated beyond the basis of economic criteria. Drumgrange looks closely at Quality, environmental protection, compliance with human rights, labour, and social standards as well as anti-discrimination and anti-corruption policies. Drumgrange is committed to the principles of “responsible sourcing” and wants to partner with suppliers to further develop sustainability performance in its supply chain. We expect our suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social, and corporate governance standards (ESG standards). We also expect our suppliers to use their best efforts to implement these standards with their suppliers and subcontractors.

2 Supplier Code of Conduct

- 3 This Supplier Code of Conduct applies to all Drumgrange suppliers, service providers, and other contractors (“Suppliers”). All Suppliers are responsible for ensuring that all employees and upstream supply chain partners involved in the delivery of Drumgrange business are familiar, and compliant with the Code.
- 4 Drumgrange reserves the right to amend this Code at its sole discretion without notice.
- 5 If at any time a Supplier becomes aware of an actual or potential violation of this Code, or otherwise has any compliance related concern, the matter must be promptly reported to Drumgrange as soon as practically possible via your Drumgrange POC or through the Company Contact form at www.drumgrange.com/contact-us/

2.1 Compliance

- 6 Suppliers are required to comply with all applicable laws, regulations, and rules in the countries in which the Supplier is located or does business, including relevant international laws and regulations such as those related to business integrity, human rights and safety, health, and the environment.

2.2 Anti-Bribery and Anti-Corruption

- 7 All business must be conducted free from any form of corruption or bribery in compliance with Bribery Act 2010 or national equivalent. Suppliers must keep all gifts, entertainment, and hospitality with Drumgrange reasonable in nature, value, and frequency, for business purposes and must not be intended or perceive to intend to influence decisions on business in any way.

2.3 Financial Crime

- 8 Suppliers are expected to implement sufficiently robust risk management procedures and internal controls to detect, prevent, deter, and respond to all forms of financial crime including tax evasion, money laundering, fraud, and the financing of terrorism.

2.4 Export Controls and Trade Sanctions

- 9 Suppliers are required to comply with all applicable trade rules, import-export controls, restrictions, sanctions, and import-export embargos including laws, regulations and rules relating to illegal boycotts.
- 10 Competition/Antitrust
- 11 Suppliers are to compete fairly and must comply with all applicable competition and anti-trust laws. Suppliers must avoid agreements and practices that have a restrictive effect on competition such as price fixing, market allocation or abuse of a dominant position

2.5 Data Privacy

- 12 Suppliers must comply with all relevant data protection laws, including where applicable the EU General Data Protection Regulation 2016/679 and the UK Data Protection Act 2018.

2.6 Conflicts of Interest

- 13 Suppliers must not engage, with Drumgrange employees in any way that could cause an actual or potential conflict of interest. Suppliers must not seek to take advantage through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts or any other unfair dealing practice.

2.7 Confidentiality

- 14 Suppliers are expected to respect and safeguard Drumgrange intellectual property including its know-how and confidential information which must not be shared with any third party unless expressly authorised. All information provided by Drumgrange that is not in the public domain is deemed confidential and is only to be used for its intended purpose.
- 15 Intellectual Property includes, but is not limited to, trademarks, copyright, patents, inventions, know-how, design, mask works, and trade secrets.
- 16 All confidential information belonging to third parties must be obtained and used legitimately and in compliance with all applicable laws, regulations, standards, and contractual obligations.
- 17 Suppliers are expected to sign, and abide by, legally binding Non-Disclosure Agreements with regard to information obtained as a result of working with the Company.
- 18 Certain information may be classified for security purposes. Suppliers will be assessed to ensure they meet the requirements to receive and protect such information.

2.8 Record Keeping

- 19 Suppliers should ensure that all business dealings are transparent and accurately and completely recorded. These records must be retained in accordance with all applicable laws.

2.9 Labour Standards

- 20 Drumgrange is committed to ensuring its staff, contractors and suppliers provide a work environment supporting worker rights, safe working conditions and appropriate pay and conditions of employment. This includes:
- (1) Provision of workplaces that aim to be injury-free and incident-free for all employees, visitors, and contractors,
 - (2) Commitment to a fair policy of employment and remuneration in compliance with applicable laws, regulations, and rules. Suppliers must comply with all applicable laws and regulations relating to minimum wage and working hours.
 - (3) Respecting and recognising all applicable legal rights of workers to freedom of association and collective bargaining. Workers are not to be intimidated or harassed in the exercise of this legal right.
 - (4) Providing a working environment that is free from bullying, harassment, intimidation, or fear,
 - (5) Ensuring equal opportunities for all in employment without discrimination on grounds of race; age; role; gender; gender identity; colour; ethnicity; country of origin; social class; religion; sexual orientation; marital status; pregnancy; dependents; disability union membership; political views; or any other reason.
 - (6) Provide a mechanism for individuals to raise concerns about actual or potential violations of law or the principles provided in this Code. If raised, such concerns must be addressed in a fair and transparent way. Suppliers are expected to protect confidentiality and prohibit retaliation against those who raise any concerns

2.10 Modern Slavery

- 21 Suppliers must not permit any form of forced, bonded, child labour or human trafficking in line with Modern Slavery Act 2015 or national equivalent and must not permit any form of unacceptable treatment of its workers including exploitation of children or involuntary servitude.

2.11 Health and Safety

- 22 The safety and health of every individual who may be affected by the Supplier's operations, including the Supplier's employees, is paramount. The Supplier must act positively to prevent injury, ill health, damage, and loss arising from its operations, and will comply with all applicable laws, regulations and rules relating to safety, health, and the environment.

2.12 Conflict Minerals

- 23 Suppliers are expected to adopt policies and management systems consistent with eradicating the use of minerals sourced from mines used to finance armed conflict

and human rights abuses from our supply chain. We expect our suppliers to ensure that all materials, components, subassemblies, and products are from responsibly sourced minerals in accordance with relevant legislation and best practice and be able to demonstrate this through due diligence processes.

2.13 Anti-Counterfeit

- 24 The supplier is required to demonstrate that they are actively planning and managing the risk of counterfeit material in their organisation and supply chain to prevent delivery of such material to Drumgrange.
- 25 Drumgrange understands there is a worldwide problem concerning counterfeit components entering the supply chain and is committed to sourcing components and materials from companies that share our values.
- 26 Drumgrange will act against any supplier providing non-legitimate products or services.
- 27 Due to the nature of our work, Drumgrange requires compliance to DEF STAN 05-135 (Avoidance of Counterfeit Materiel) through the supply chain.

2.14 Sustainability & Environment

- 28 Suppliers must ensure that their business operations, including the sourcing, manufacture and distribution of products and the supply of services are conducted with the aim delivering sustainability, reduction of environmental impact and where possible embracing a circular economy model by designing out waste and pollution, keeping products and materials in use, and regenerating natural systems.
- 29 Suppliers are expected to strive for continual environmental improvements in their operations including in relation to natural resource consumption, material sourcing, energy and water usage, waste generation and emissions. As a minimum, Suppliers are expected to meet all applicable environmental laws, regulations, and rules in the countries in which they operate.

2.15 Products & Services

- 30 Suppliers shall supply products and services that are of the requisite quality, and which meet all applicable safety standards and comply with all terms and conditions of any agreement with Drumgrange.