



## **Supplier Code of Conduct**

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# Version History

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# 1. Introduction

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Delta Capita operates in many markets and countries throughout the world. In all instances, we require our suppliers to respect and abide by national and relevant international laws.

We are committed to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity. This includes not only our employees, but also all of our suppliers (including subcontractors.). As a result, DC expects all suppliers to abide by the same principles as in its Code of Business Conduct.

This Supplier Code of Conduct is subject to periodic updates and revisions reflecting Delta Capita's culture of continuous improvement. These updates not only mirror the evolving needs of our diverse supply base, but also support the ongoing alignment of the Code to our internal programmes and ever-changing regulatory requirements.

*Please note that this Code is designed as a non-contractual supplement to any contractual agreements between yourselves and DC. In the event that there is a conflict between this Code and our contractual agreements, the latter takes precedence and will be applied.*

## 2. Human Rights

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### 2.1. Equal opportunities and diversity

DC is committed to ensuring all people – including current employees, future or previous employees and contractors – as well as all clients and any other individuals connected to DC, are treated fairly and equally at all times. As such DC will organise all activities to ensure diversity is valued and equality of opportunities maintained.

### 2.2. Discrimination

Suppliers of DC are expected to behave fairly and equally in all their dealings with others. Any form of discrimination – including direct (treating someone less favourably due to a specific characteristic), indirect (creating obstacles to obstruct or inhibit certain people), harassment (behaviour which either intentionally or non-intentionally violates the dignity of another person), victimisation (as a result of a complaint made by an individual) or disability discrimination (which may be direct or indirect and is as a result of a disability) – will not be tolerated.

### 2.3. Human Trafficking and Modern Slavery Act

Delta Capita has zero tolerance of slavery or human trafficking within any part of its business or supply chain. Suppliers are expected to monitor their own business practices and ensure compliance.

## 3. Business Ethics

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### 3.1. Data Confidentiality

Suppliers may be privy to confidential information during the course of their engagement. It is a requirement that any such information must remain confidential during the duration of the engagement and after the engagement ends. Confidential information may include – but is not limited to - the commercial affairs and interests of DC and information received as part of your engagement, including DC company, staff and client information; strategies; business plans; project content; client documents; methodologies; inventions; client lists; business contacts; account strategies and plans; pricing; rate cards; and other information not specified.

Please note that in order to prevent the inadvertent misclassification of confidential information all suppliers should refrain sharing client information with other supplier staff not engaged on the project. DC is committed

to the thorough investigation of any suspected mistreatment of confidential information and will ensure this is carried out promptly and without prejudice. However, violation of this policy may result in criminal consequences in certain jurisdictions.

### **3.2. Gifts and Invitations**

In line with legal restrictions preventing bribery, DC employees are not permitted to accept any gift of a high value including but not limited to: meals, drinks or entertainment from suppliers. This is to ensure all employees remain above suspicion in the event an anti-corruption or bribery investigation takes place.

In addition, no gift may be accepted which:

- May be perceived by a reasonable, uninterested person to have, or have the intention to, influence the employee in an inappropriate manner;
- Is given more than annually;
- Is given as cash;
- Offered in exchange for something else;
- Is indecent, violent, or sexually oriented;
- Is illegal;
- Was requested; or
- Could be viewed as detrimental to DC's reputation.

Suppliers are expected to understand and fully comply with this policy.

## **4. Sustainability**

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### **4.1. Corporate Social Responsibility**

Corporate Social Responsibility (CSR) is concerned with the sustainability of DC's ethics over the long term, and ensuring we have a positive effect on both our immediate and far-reaching environments. DC recognises that our activities have an impact on society, the environment and the economy, and is committed to ensuring these impacts are as positive as possible.

A critical element of our CSR programme is a conscious effort to be environmentally-responsible. As a result, we expect our suppliers to conduct their business in a fashion that respects and protects the environment. This manifests itself in business practices that include, but are not limited to:

- Implementing recycling practices in all offices / premises
- Ensuring the re-use of equipment, where possible
- Purchasing ethically-sourced goods
- Striving for carbon neutrality

If requested, suppliers will be required to provide Delta Capita with evidence of their sustainability policies and practices, as well as the results of any ESG benchmarking.

## **5. Well-Being**

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### **5.1. Health and Safety**

DC is committed to providing a safe working environment and ensuring all possible measures are taken to remove or reduce risks to health, safety and welfare for all staff and visitors.

DC will:

- Provide a safe working environment for all staff and visitors;
- Provide any information, instruction, training and supervision needed to ensure all workers and visitors are safe from injury and risks to their health;

- Communicate emergency procedures to all staff in case of fire or any other significant incident;
- Ensure an annual risk assessment of the premises is carried out to identify and eliminate any hazards to staff and visitors;
- Review and revise this policy when required.

Each Supplier should ensure they:

- Take reasonable care of the health and safety of themselves and others;
- Adhere to instructions provided by DC in relation to health and safety;
- Report any accident or incident that occurs in the workplace regardless of the severity;
- Report any potential hazards to ensure these are eliminated or reduced.

*This Supplier Code of Conduct does not constitute a contract, and nothing contained herein is intended to create or convey any rights, actions, or remedies to any person or entity.*