

# Supplier Code of Conduct

This Supplier Code of Conduct outlines the standards our suppliers are expected to uphold regarding working conditions, business ethics, and environmental impact. Harrison is committed to conducting all aspects of our business with honesty, integrity, and transparency, while respecting human rights and the interests of our employees, customers, and third parties, as detailed in our Ethical Trading Policy (HS-QMS-009). Our suppliers play a vital role in helping us meet these commitments and uphold the standards we set. Therefore, we expect all suppliers to maintain high levels of social and environmental responsibility.

This Code of Conduct applies to all suppliers and sub-contractors involved in the production or sourcing of products and materials we sell. We expect you to share the contents of this code with all employees, ensuring they are aware of their rights and responsibilities, and to cascade these principles throughout your supply chain.

## 1 Human and Labour Rights

We expect all Suppliers and sub-contractors to ensure fair wages, safe working conditions, and compliance with the fundamental standards set by the International Labour Organisation<sup>1</sup>, UN Universal Declaration of Human Rights<sup>2</sup>, Equality Act 2010<sup>3</sup>, Modern Slavery Act 2015<sup>4</sup>, or any applicable local laws and regulations in their country of operation.

Suppliers and sub-contractors must adhere to the following:

- Employment must be free from discrimination, ensuring equal opportunity and fair treatment for all, regardless of race, age, gender, sexuality, religion, disability, social origin, or any other protected characteristic, in line with the Equality Act 2010 or local equivalent law
- Employment must be freely chosen, with no use of forced, bonded, or prison labour. Workers must not be required to pay deposits or surrender their identity documents, in compliance with the Modern Slavery Act 2015 or local equivalent law
- Exploitation of child labour (individuals under the age of 16) is prohibited, and no one under 18 may be employed, even temporarily. Young people aged 16 to 18 may only be employed through specific and supervised education or training programs (e.g., internships or apprenticeships) in safe jobs that prioritise their health, safety, and overall development
- Physical abuse, threats of physical abuse, punitive or unusual forms of discipline, sexual harassment, and intimidation by the employer are strictly prohibited
- Employees must have the right to freedom of association and collective bargaining in accordance with all applicable laws and regulations in the countries where they operate

## 2 Business Ethics

Our Suppliers and sub-contractors are required to comply with the following:

- No direct or indirect payment, promise of payment, authorisation of payment, or transfer of money or anything of value, nor any inducement, may be offered to any employee, representative, or associated persons of Harrison to secure any advantage or benefit in relation to conducting business with Harrison
- Compliance with the Bribery Act 2010<sup>5</sup> or local equivalent anti-corruption law and regulations is required. Offering, providing, or accepting anything of value to improperly influence an official act or to secure an improper

advantage to obtain or retain business is prohibited. This includes facilitation payments or other benefits provided to public officials for routine, non-discretionary actions

- Adherence to all relevant laws and regulations designed to combat money laundering activities is mandatory
- Financial records and reports must be maintained in accordance with applicable laws and regulations
- Compliance with laws and due diligence obligations regarding the sourcing of minerals and materials from conflict-affected or high-risk regions is necessary, ensuring such sourcing does not contribute to human rights abuses, corruption, the financing of armed groups, or similar negative consequences
- Any actual or potential conflict of interest related to activities with Harrison must be disclosed immediately, including, but not limited to, relationships by blood or marriage, partnerships, investments, or affiliations with business partners or competitors.

### **3 Quality**

Our Suppliers and sub-contractors are required to uphold the following quality standards:

- Apply risk-based thinking across the organisation to identify and mitigate potential issues
- Assess risks within their operations and supply chain, implementing appropriate controls
- Establish effective corrective and preventive action processes
- Promptly review, report, and resolve non-conformances in an effective manner
- Maintain documented processes, records, and version control in compliance with legal and statutory requirements to support auditing and continuous improvement
- Regularly review monitoring and measurement requirements, as well as process outputs, to ensure ongoing effectiveness
- Ensure the capability, either internally or through a qualified third party, to design, inspect, and test products, along with any required documentation, in line with stated standards
- Demonstrate commitment from senior leadership and promote culture of quality standard awareness throughout the organisation
- Maintain up-to-date records of employee training and competency relevant to their roles
- Notify Harrison immediately in the event of the loss or withdrawal of a certified accreditation.

### **4 Environmental Responsibility**

Our Suppliers and sub-contractors are required to contribute to sustainable business practices and environmental protection, as follows:

- Compliance with environmental laws and regulations in the countries where they operate (examples include but not limited to: COSHH<sup>6</sup>, Environmental Protection Act<sup>7</sup>, Control of Pollution Act<sup>8</sup>, R.O.H.S<sup>9</sup>, Dangerous Substances Regulations<sup>10</sup> and REACH<sup>11</sup>)
- Implement a waste and recycling management system that appropriately controls, manages and suitably disposes of waste material
- Track and document their consumption of natural resources, such as water, raw materials, and energy. By identifying areas they can control and influence, they should work towards reducing consumption and improving sustainability
- Suitably monitor and review further supply chain for all of the above points

## 5 Health and Safety

Our Suppliers and sub-contractors are expected to offer a safe working environment to their employees:

- Implement systems to detect, prevent or neutralise any threat to the health and safety of staff and comply with local and international legal regulations
- Work areas must be kept clean, free from pollution, and equipped with safe machinery that does not pose a health risk to employees. Employees must follow all instructions regarding the use of personal protective equipment (PPE/RPPE) and work tools
- The workplace must have proper lighting, and temperature and noise levels should remain within acceptable limits. If noise exceeds safe levels, appropriate PPE, such as ear protection, must be provided and used
- First aid equipment must be readily available in appropriate locations, and at least one trained first aider should be present at each site
- Hazardous materials and equipment must be stored and handled in accordance COSH� or local equivalent regulations is required
- All employees must be informed about workplace safety procedures, including emergency exits, fire extinguishers, and first aid stations. An evacuation plan should be clearly displayed on every floor, fire alarms must be tested regularly, and evacuation drills should be conducted routinely
- Responsible to implement the appropriate organisation to comply with the REACH requirements for products sold in EU and to support Harrison with all required information related to the application of the REACH legislation.

## 6 Confidentiality and Data Security

Our Suppliers and sub-contractors are expected to:

- Comply with all applicable data protection laws and regulations, including but not limited to the General Data Protection Regulation (GDPR)<sup>12</sup>
- Implement robust data security measures to prevent unauthorised access, disclosure or breaches
- Maintain strict confidentiality of all proprietary, financial, business and technical information received from Harrison
- Use confidential information solely for the agreed-upon purpose and never disclose it to unauthorised third parties
- Maintain a clearly defined and documented privacy policy outlining their approach to data protection and confidentiality
- Ensure that employees, contractors, and other relevant parties are bound by confidentiality agreements and uphold the same data security and confidentiality standards
- In the event of a suspected or actual data breach involving Harrison-related information, suppliers must:
  - Notify Harrison immediately upon discovery of the incident
  - Provide details on the nature and scope of the breach, including potential impacts
  - Fully cooperate in investigations and remediation efforts to mitigate any risks.

## 7 Business Continuity Planning

We expect our Suppliers and sub-contractors to:

- Be prepared for potential business disruptions, including: natural disasters, terrorism, supply chain interruptions, communicable disease outbreaks (epidemics or pandemics), information security threats, and cyber-attacks. This preparedness includes the implementation of a robust Business Continuity Plan to protect both employees and the environment from the effects of possible serious disruptions that may arise within the domain of operations
- Maintain active public liability insurance and product liability insurance to ensure adequate protection against potential risks.

## 8 Compliance Monitoring

We expect our Suppliers and sub-contractors to:

- Provide information about the scope of their operations and notify us of any changes
- Permit workplace inspections by a Harrison representative or an inspector acting on our behalf
- Regularly audit their supply chains to ensure sustainability and compliance with the Code of Conduct
- Maintain compliance data collation for timely reporting

Harrison reserves the right to verify compliance with the Code of Conduct through self-assessment or audits conducted by Harrison or a third party such as SEDEX<sup>13</sup>.

Clear and undeniable violations of the Code of Conduct must be addressed immediately. Where a corrective action can be reasonably expected, parameters and a time frame for implementation will be set and these must be communicated to us. Suppliers found repeatedly violating the Code of Conduct code may face termination.

If you have any questions relating to the content of this Code of Conduct, please contact **Jerry Whiteside, Commercial Manager** via [purchasing@harringtonglobal.com](mailto:purchasing@harringtonglobal.com)

On behalf of the company listed below, I confirm that I have read, understood, and agree to comply with the requirements of the Supplier Code of Conduct.

Name		Job Title	
Signature		Date	

## 9 References

<sup>1</sup> International Labour Organization Standards

- 1.1 [C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 \(No. 87\)](#)
- 1.2 [C098 - Right to Organise and Collective Bargaining Convention, 1949 \(No. 98\)](#)
- 1.3 [C029 - Forced Labour Convention, 1930 \(No. 29\)](#)
- 1.4 [C105 - Abolition of Forced Labour Convention, 1957 \(No. 105\)](#)
- 1.5 [C138 - Minimum Age Convention, 1973 \(No. 138\)](#)
- 1.6 [C182 - Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#)
- 1.7 [C100 - Equal Remuneration Convention, 1951 \(No. 100\)](#)
- 1.8 [C111 - Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#)

<sup>2</sup> Universal Declaration of Human Rights (UDHR) - [Universal Declaration of Human Rights | United Nations](#)

<sup>3</sup> Equality Act 2010, UK- [Equality Act 2010](#)

<sup>4</sup> Modern Slavery Act 2015, UK - [Modern Slavery Act 2015](#)

<sup>5</sup> Bribery Act 2010, UK - [Bribery Act 2010](#)

<sup>6</sup> The Control of Substances Hazardous to Health Regulations 2002 (COSHH), UK - [The Control of Substances Hazardous to Health Regulations 2002](#)

<sup>7</sup> Environmental Protection Act 1990, UK - [Environmental Protection Act 1990](#)

<sup>8</sup> Control of Pollution Act 1974, UK - [Control of Pollution Act 1974](#)

<sup>9</sup> Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS), EU - [RoHS Directive - European Commission](#)

<sup>10</sup> The Dangerous Substances and Explosive Atmospheres Regulations 2002, UK - [The Dangerous Substances and Explosive Atmospheres Regulations 2002](#)

<sup>11</sup> The Regulation on the registration, evaluation, authorisation and restriction of chemicals, EC 1907/2006 (REACH), EU - [REACH Regulation - European Commission](#)

<sup>12</sup> General Data Protection Regulation (GDPR) 2016/679, EU [General Data Protection Regulation \(GDPR\) — Legal Text](#)

<sup>13</sup> SEDEX - [Sedex: Sustainable business and supply chain solutions](#)

## Revision and Amendment Register

Page Number	Author	Revision Details	Version Number	Date of Issue
All	Jerry Whiteside & Mark Adams	Inclusion of Business Ethics, Quality, Environmental Responsibility, Confidentiality and Data Security, Business Continuity Planning and Compliance Monitoring Sections.  Addition of URL links to legal documentation for Supplier reference.	V6	18/03/25
All	Peter Attwood	Update to new template, inclusion of Supply Chain Audit statement	V5	18/07/24
All	Michaela Wain	Change of document branding & address details	V4	29/06/23