

Supplier Code of Conduct

Version 1.7

Updated By	Vanessa Gorham – Head of ISO Compliance
Changes in this Version	Annual Review – No Changes
Approved By	Bethan Cater - Director of Internal Compliance
Date of Approval	September 2025
Next Review	September 2026

Supplier Code of Conduct

Introduction and Scope

At Wilmington plc we believe that establishing effective business relationships requires a mutual commitment to responsible behaviour and to maintaining the highest standards of ethical practice. As a business we promote a culture that reflects this high standard of practice and expect the same commitment to be demonstrated by any individuals or organisations we work with.

Our supplier code of conduct 'the Code' sets out the expectations we have of suppliers to ensure that they support the same core principles as those underpinning our sustainability strategy.

The Code applies to all suppliers, contractors and subcontractors engaged by Wilmington plc or any of its subsidiaries. Wilmington plc reserves the right to monitor compliance with the Code, and to challenge non-compliance by requesting that reasonable remedial action is taken in response to breaches. In the event of repeated or significant breaches of the Code, Wilmington plc reserves the right to terminate the business relationship.

Core Principles

The core principles of the Code align closely to the values that underpin our own approach to responsible business practice, which can be found on our website.

The behaviours and values we expect our suppliers to demonstrate focus on four core areas:

- People and culture
- Compliance and ethical behaviour
- Environmental responsibility
- Accessibility

People and Culture

We are committed to promoting a positive culture that creates equal opportunities and nurtures talent in a safe and mindful environment. We therefore expect our suppliers to support these values by demonstrating best practice in the following areas:

Equality, Inclusivity and Respect

Suppliers must exhibit and advocate respectful treatment of anyone who interacts with their operations. This includes taking a zero-tolerance approach to discrimination in any form, including on the grounds of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation. Suppliers should also advocate behaviours that ensure equal opportunities in relation to recruitment, reward, personal development and career progression.

These equal opportunities should also be reflected in the relationships suppliers have with their own third-party business partners.

Human Rights and Employment Law

Suppliers must comply with all applicable human rights and employment laws in the jurisdictions in which they operate. This includes, for example, complying with the provisions of the UK's Modern Slavery Act 2015. By supporting these regulations suppliers should pay fair wages and benefits in line with the relevant geographical and industry standards.

Health, Safety and Wellbeing

Suppliers must maintain safe working environments and commit to providing relevant health and safety training and personal protective equipment in compliance with all applicable laws and regulations. Suppliers must also demonstrate an awareness of, and take action to support, the wellbeing of all individuals they interact with through their operations.

Compliance and Ethical Behaviour

Wilmington plc's ethics policies are designed to provide clear and consistent guidance to our people to ensure they uphold high standards of ethical conduct across all areas of our operations. We also recognise that effective management of data and information is critical to our business, and we have a responsibility to both our employees and our customers to uphold the highest standards of security and appropriate use of data and information in our business. The ethical behaviours we expect our suppliers to demonstrate relate to the following issues:

Honesty and Transparency

We expect business to be conducted in an honest and transparent way, and to avoid any potential conflict of interest. This extends to a demonstrating a zero-tolerance approach to bribery and corruption in any form, in line with the ABC policy available on our website. We expect all suppliers to maintain up to date and accurate business records and to have appropriate internal controls in place to prevent the provision of false information.

Information and Data Security

All suppliers are expected to follow robust practices to safeguard the integrity and security of any systems that record or process information and data. This includes following all applicable data protection and privacy laws and providing relevant training and guidance to any individuals who have access to information and data. Suppliers must have procedures in place to respond to any known or suspected security breach or loss of confidential or sensitive information or data, and must notify Wilmington plc immediately if any such event were to occur.

Artificial Intelligence (AI)

Our expectation is that any provision of service or deliverables by our supply chain is the result of independent, original efforts. Any use of Artificial Intelligence (AI), software, tools or technologies,

(including natural language processing, deep learning algorithms, machine learning models or other generative AI), is not permitted without written consent from Wilmington. This includes analysing, processing or storing Wilmington propriety or confidential information.

In instances where a provision for the use of AI has been agreed in advance, due diligence and best practice must be applied ensuring all use of AI is fair, secure, private, unbiased, trustworthy and reliable.

Business Continuity

Wilmington plc expects all suppliers to take responsibility for the impact of any disruption to operations that has the potential to compromise the delivery of goods or services to our business.

Tax Compliance

We expect all suppliers to comply with all applicable tax laws, and to take an ethical approach to tax matters to ensure that they do not commit or facilitate tax evasion in any form.

Environmental Responsibility

We recognise the need to commit to environmentally responsible operations as part of our commitment to creating a healthy planet for our people, our partners and our local communities to prosper. As part of this commitment, we strive to engage with suppliers who support our efforts to reduce the environmental impact of our business operations. We seek to work with suppliers who demonstrate responsible behaviour in each of the following areas:

Climate Change

We expect suppliers to understand their carbon footprint, and to be committed to reducing this. Where relevant we expect suppliers to be working to set carbon reduction targets, and to offset greenhouse gas emissions that cannot practically be eliminated.

Resource Use and Waste Management

We expect suppliers to source and dispose of materials in line with our environmental policy. We also expect suppliers to act to reduce waste and to support the circular economy by reducing consumption and increasing their use of renewable or recyclable materials in their operations.

Accessibility

Wilmington is committed to accessibility and expect our suppliers to have the same considerations in ensuring their products and services are accessible to the widest possible audience. In particular we expect commitment in the following areas.

Digital and IT services

When providing digital and IT services, ensure accessibility is included in the scope, planning and

implementation of the project with a clear aim towards achieving at least WCAG 2.1 AA, and a mechanism for testing and continually improving provision of accessibility.

Content and Design

Layout, fonts and colours meet accessibility needs of the end user. Text will be written for optimal results with a text reader. Alt text is included for all online images. Closed captions will be available for all spoken content.

Face to Face Training and Events

Spaces are accessible for users with disabilities including shared spaces (bathrooms, reception, waiting rooms etc). Carers and seeing dogs can attend with participants and delegates. Resources will be provided in formats to meet the needs of individual disabilities as required.

Compliance and Support

We strive to create a safe and open culture to encourage employees, customers, suppliers, and any other party who interacts with our operations to confidently report any act of non-compliance with this Code. If there are any concerns or knowledge of non-compliance, we want to be informed as soon as possible. These concerns can be reported to info@wilmingtonplc.com or through our confidential whistleblowing contact address whistleblowing@wilmingtonplc.com.

Due Diligence

As part of our due diligence process, we may look to contact any suppliers for documentation to support their compliance with our Code of Conduct. Our supplier process requires all invoices to have a Purchase Order number and to be submitted to the email address show on the PO. Our standard payment terms are 30 days.