

MS3 Networks

Supplier and Partner Code of Conduct

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MS3 Networks

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Introduction

Our aim here at MS3 is to ensure we are creating a more positive impact on our planet, our colleagues and the residents in the areas in which we are working. We want to ensure we are providing our customers with not only choice but ensuring that the goods and services that are purchased via MS3 have been sourced and produced to the highest standard and in a responsible manner.

MS3 expect that our partners and suppliers all share the same values that we have. This Supplier and Partner code of conduct shows the principles that MS3 work to and what is expected from its supplier base. This means that MS3 can be confident that the goods and services it provides have been developed responsibly, lawfully with decent working conditions, and without damaging the environment.

This Code of Conduct applies to any person, partner or company that is involved in supplying goods or services to MS3. This code shows the minimum expectation and requirement from our suppliers.

We expect that any suppliers will communicate the principles in this Code of Conduct to any of its

subcontractors or business partners who may play a part in providing goods or services to MS3. Its aim is to ensure there is financial and social transparency within MS3's supply chain, including full disclosure regarding human rights, health and safety and environmental impacts.

Our Principles

MS3 have very clear values for both its employees and its suppliers and contractors.



We are One Team



We take Ownership



We are Inclusive



We deliver for our customers

We take pride in working responsibly with our partners, customers and colleagues and we require the same standards from our suppliers.

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Laws, Business Ethics, Fraud, Bribery and Corruption

At MS3 we are committed to conducting business in a fair honest and open way. We expect that our employees do not take part in any activity that would affect their judgement when dealing with suppliers. MS3 employees are not able to accept inappropriate gifts of benefits from our suppliers.

We expect our suppliers to comply with the UK Bribery Act 2010 and the UK Finance Act 2017 (criminal facilitation of Tax Evasion). Suppliers are required to have procedures in place for the for detection and prevention of fraud, bribery and corrupt business practises, as outlined in current legislation.

Compliance with the Modern Slavery Act 2015 by suppliers and the implementation of procedures and protections to ensure that the supplier's supply chain is also compliant is a necessity.

Ethical Standards

Here at MS3 we expect all businesses within our supplier chain to share a commitment to protecting, respecting and promoting human rights.

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As a minimum, we expect:

- employment is freely chosen
- the right of collective bargaining
- safe and hygienic working conditions
- no use of child labour
- no excessive working hours
- no discrimination
- no harsh or inhumane treatment

Discrimination

We expect our suppliers to comply with the Equality Act 2010. This means that suppliers should not discriminate against an employee on the grounds of race, age, disability, gender, religion, belief, sexual orientation, marital status or pregnancy.

Suppliers should ensure that workers are never harassed, intimidated, bullied or threatened. All workers should have access to a grievance or appeal procedure and any disciplinary measures taken should be recorded.

We would also draw attention to our suppliers' duty to make reasonable adjustments if a disabled job applicant or employee is at a disadvantage in relation to others. This duty applies to both the physical features of the premises e.g. fittings and equipment, and to all other aspects of employment including recruitment, training and retention.

Employee Practices

As a responsible employer, we aim to create a workplace that recognises and rewards the potential of our people. We achieve this through a focused people strategy and also through the creation of a fair and equitable workplace.

In keeping with our values, we expect that our suppliers will comply with current employment legislation at all times. We also expect that our suppliers will engage in the following way.

Freedom of Employment

To respect and support the right of employees and workers to associate freely and to communicate openly with management regarding working conditions without fear of repercussions. The employees or worker's right to join a trade union, workers organisation, or seek representation should be acknowledged.

Working Hours

All our suppliers should comply with legislation and/or industry standards on working hours.

Managing Risks

We take our responsibility to identify and manage risk very seriously and we aim to support our suppliers by implementing necessary processes

and systems to control, manage, anticipate and respond to any challenges we face.

Health & Safety

Health and Safety awareness and best practice is embedded within MS3's culture, values and behaviour.

We anticipate that our suppliers will be just as committed as we are providing a safe, healthy and compliant working environment for all employees and other third parties in order to preserve their health, safety and welfare and to prevent accidents, injuries or work-related illnesses.

All suppliers of physical services working for or on behalf of MS3 much have achieved certification to anSSIP member scheme.

We expect that suppliers of products will comply with applicable health and safety laws and regulations in relation to the products they supply us.

Environment

MS3's environmental policy outlines our impact on the environment and to have positive impact on our communities we serve. As such we expect that our suppliers will also comply with applicable environmental laws and regulations in relation to the products and services they supply us.

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In keeping with our values, we anticipate that our suppliers will seek to minimise any significant impacts that they may have on the environment. We expect that our suppliers will provide where requested emissions information in order for MS3 to accurately measure and offset.

Security

MS3 are committed to ensuring that effective controls are in place to protect employees and company assets such as information. Any significant compromise of personnel, physical, information or IT security could result in disruption, with potentially serious economic, delivery, safety and social consequences.

We expect our supply chain partners to demonstrate a similar commitment to security and have at the minimum;

- appropriate internal policies and procedures covering people (e.g. background checks), process and technology
- security controls proportionate to the risk, which support the policies and procedures
- independent accreditation and assurance that security controls are in place
- necessary controls in place to detect security anomalies
- plans to define the appropriate activities to perform to respond to

security incidents and events and recover from them.

Suppliers providing products and services to MS3 must comply with the relevant requirements of ISO 27001 and the UK Governments Cyber Essentials scheme, ensuring that appropriate security controls, service definitions and delivery levels are effectively implemented, operated and maintained.

Resilience and Business Continuity

We want to deliver a consistent service to our customers at all times. To give our customers confidence in our ability to do this, we expect our suppliers to have plans in place that mitigate the impact of any potential or realised disruption that may impact their, or that of any of their suppliers/partners ability to continue the supply of goods and/or services to us.

Tax Compliance

MS3 expects its suppliers to ensure they remain compliant with changes to UK tax law, and we will not work with suppliers who engage in practices which may constitute tax evasion or involve workers not being paid tax appropriately. We expect you to have procedures in place to prevent tax evasion and other offences set out in the Criminal Finances Act 2017. We expect individuals involved in providing

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services to MS3 to be paid subject to deduction of PAYE tax.

Intermediaries & Agents

If you are providing services to MS3 which include the use of an intermediary or an agent you must highlight this prior to the contract start, so that all compliance checks can be undertaken. If you do not declare this prior to the contract start MS3 reserves the right to remove any individuals from the supply chain. Failure to declare this could lead to both MS3 and you, the Supplier, being at risk of breaching tax law.

Supplier Sanctions

MS3 expect its supply chain to comply with all applicable regulations and prohibitions administered by the UK Government under the Sanctions & Anti-money Laundering Act 2018. This includes but not limited to any;

- Financial Sanctions
- Immigration Sanctions
- Trade Sanctions
- Shipping Sanctions

MS3 will actively be checking any government sanctions against suppliers.

Monitoring and Reporting

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We recognise that in order to be a responsible business we need to ensure our suppliers are following this Code. We expect our suppliers to evaluate their own activities to ensure that they are keeping to this code throughout all their business activities. They should also have suitable awareness and training opportunities in place to enable all managers and employees to support the principles of this code.

We will also carry out audits, where appropriate to ensure compliance with the code. To enable this we will need access to the suppliers and their subcontractors. After the audit has been carried out any areas of concern or opportunities for improvement will be addressed to the supplier. Failure to correct any issues raised could result in order to contract cancellation. We believe that our approach to monitoring and reporting will ensure that we are working together to deliver consistently excellent customer service.