

Supplier code of conduct

SUEZ recycling and recovery UK

September 2021



Message from our CEO

Sustainability is the only business case – for our company, and ultimately, for the Earth, economy and everyone. We reinvented our business in the UK to support the transition to a circular economy. And, we will measure and report our performance against our triple bottom line for the planet, people and prosperity. As part of this we are committed to improve the environmental, social and economic impact of our supply chain year-on-year. In 2020, we generated just under £2 billion in social value with environmental, economic and social benefits and helped our customers avoid more than 1.6 million TeqCO₂ emissions.

We spend £400 million annually on goods and services with our suppliers. Our Supply chain is critical to the successful delivery of our sustainable objectives. We therefore want to work with suppliers that share our values and have sustainable practices within the community and environment in which we and they operate.

In this supplier code of conduct, we have outlined our expectations with relation to sustainability, safety and business ethics and we expect all our suppliers to comply with and replicate these practices with their own supply chain.

If you are a supplier of SUEZ recycling and recovery UK, whether a new supplier or a supplier that has worked with us before it is imperative that you read this document and commit to complying with the requirements within it.

Thank you to all our suppliers for following this code of conduct and working with us.

John Scanlon

John Scanlon
Chief Executive Officer
SUEZ recycling and recovery UK

Introduction

We have made a commitment as a sustainable business to improve the environmental, social and economic impact of our supply chain year-on-year.

We work with colleagues to assess the needs of the business and the requirements for selecting a supplier. This rigorous process allows SUEZ to remain impartial, fair and transparent to all involved.

The supplier code of conduct applies to anyone who provides us with goods and services. When we refer to “suppliers” this includes suppliers, contractors, subcontractors, service providers, professional service providers, consultancies, intermediaries, and agents.

The supplier code of conduct sets out the behaviours we expect of our own suppliers and these principles are expected to be cascaded down your own supply chain.

The supplier code of conduct is not intended to conflict with any existing contract terms, if any conflict arises suppliers are expected to comply with existing contractual terms.

Business ethics

SUEZ conducts its business ethically and in accordance with legal and regulatory requirements. SUEZ requires suppliers to comply with all applicable laws and with the supplier code including when the supplier code sets a higher standard than legal requirements. Local practices should never take precedence over legal and regulatory requirements.

Bribery and corruption

SUEZ has a zero-tolerance approach to fraud, bribery, corruption, tax evasion and other forms of financial impropriety. We expect the same of our suppliers.

Suppliers must comply with any law that prohibits corruption and/or bribery in any part of the world where the supplier carries out its business including the Bribery Act 2010.

Suppliers must never accept, offer, pay, request or accept bribes or any other form of inducement, either directly or indirectly, under any circumstances with the intention or appearance of improperly influencing a business decision or securing an unfair advantage

Suppliers must implement appropriate and adequate procedures for employees to comply with all applicable anti-corruption laws and the standards of the supplier code of conduct.

Suppliers should not engage in any fraudulent or unethical activities.



Suppliers must never engage in any form of facilitating tax evasion, nor aid, abet, counsel or procure the commission of tax evasion offence by another person.

Suppliers must not engage in the practice of money laundering and must not launder the proceeds of any corrupt practices. This includes concealing or disguising the illegitimate origin, source, location, disposition, movement or ownership of property and/or money knowing that such is the proceeds of a crime.

Suppliers should ensure all reports, records and invoices are complete, accurate and not misleading.

Suppliers must report all instances of financial impropriety to SUEZ.

Conflicts of interest

We strive to operate in a way in which conflicts of interest are avoided and we require our suppliers to do the same.

Suppliers should avoid situations which may be a conflict of interest or have the appearance of a conflict of interest.

Suppliers should declare to the SUEZ procurement department any personal or professional activity, relationship or pursuit which impairs (or may be perceived as impairing) the ability to make objective decisions or has the appearance of impropriety. Potential and actual conflicts of interest must be disclosed in advance of and throughout any relationship with SUEZ.

Gifts and hospitality

We value relationships based on trust and respect. We recognise that offering gifts and hospitality can be part and parcel of normal business practices designed to build goodwill. However, gifts and hospitality may be (or may appear to be) improper. We do not request, accept, or authorise any gifts or hospitality that might (or have the appearance of) improperly influence our business. SUEZ has an established gifts and hospitality policy which outlines acceptable circumstances and monetary limits.

Suppliers should not offer any gift or hospitality which may influence or be perceived to influence a business decision or to obtain an unfair competitive advantage.

Under no circumstances should a gift or hospitality be offered by a supplier who is engaged in a tender or negotiation process.

Suppliers must report any instances of a SUEZ employee requesting (directly or by implication) a gift or hospitality service for free or less than market value.

Data protection

We have a duty to protect personal information and ensure this is handled responsibly. We take protecting the personal data of our customers, employees and the third parties we interact with seriously. Please refer to our Data Protection Policy.

Suppliers should appoint a data protection officer where appropriate.

All uses of personal data should be carried out in accordance with applicable laws and regulations including the UK General Data Protection Regulations in the Data Protection Act 2018.

Suppliers should not process any personal data obtained from or regarding SUEZ without our explicit written instructions.

Suppliers should not engage any sub-processors to process any personal data supplied by us or collected by you or for the purpose of a contract with SUEZ without our consent.

Suppliers should implement all technical and organisational measures which are reasonable in the circumstances.

Suppliers should take all reasonable measures to prevent our confidential information, or that of our customers and business partners, from being disclosed to any person who does not need or have the right to that information. You should protect any intellectual property rights belonging to SUEZ.

Suppliers should not share, create or endorse any social media content that could be deemed derogatory, offensive or discriminatory, or speak on behalf of SUEZ without prior authorisation.

Cyber security

Failing to protect sensitive and classified information can have catastrophic reputational impact. We take steps to reduce the risk of a cyber security breach and expect our suppliers to have systems with appropriate protection.

Suppliers should protect SUEZ's sensitive and classified information, acting in compliance with UK data security laws. This includes the effect and maintenance designed to prevent the accidental loss, destruction or damage to SUEZ's systems or data.

Access to sensitive and classified information should be limited and on a need to know basis.

Suppliers must notify SUEZ in the event of a cyber security breach.

People

We care for our people and the people affected by our activities. We support human rights and fair working conditions. We expect our suppliers to respect the rights and dignity of all their employees and those of their supply chain.

Suppliers are expected to treat people with dignity and respect and to promote and maintain an ethical and inclusive culture in the workplace.

Suppliers must comply with respective national laws and regulations regarding working hours, wages and benefits as a minimum.

Suppliers are expected to respect the right of workers to associate freely and communicate with management regarding working conditions without fear of harassment, intimidation or penalty.

Health and safety

SUEZ continually strives to achieve the highest standards of health, safety and environmental practice and performance in all its activities, and it expects its Suppliers to aspire to similar standards.

These include good management practices and attention to the health and safety of both the supplier's employees and other people who may be affected by their activities as well as taking a responsible attitude towards the environment.

SUEZ operates to ISO standards for Environmental Management (ISO14001), Quality Management (ISO 9001) and Health and Safety (ISO 45001). Whilst it is not compulsory for suppliers to be certified to these standards, the company does expect suppliers to operate to comparable good practice, and in compliance with all relevant legal requirements.

All Suppliers who carry out works or provide services on premises operated or controlled by SUEZ, or on third-party premises or in a public place on behalf of SUEZ must comply with the SUEZ “Safety, health, environment and quality (SHEQ) rules for contractors” which are available from the procurement department.

Modern day slavery

SUEZ are committed to tackling the threat of modern slavery and we expect our suppliers to share the same commitment.

SUEZ recognises the need to adopt a robust approach to slavery and/or human trafficking and commits to identifying areas of risk within our business, and to develop strategies and approaches to mitigate those risks and protect workers in the supply chain proactively.

SUEZ are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our suppliers, and we expect that our suppliers will hold their own suppliers to the same high standard.

Suppliers are expected to adhere to all laws and regulations prohibiting human trafficking and forced or indentured labour, such as the Modern Day Slavery Act 2015. This includes the preparation and publishing of an annual statement where your turnover exceeds UK legislative thresholds.

Suppliers should implement policies, practices and due diligence checks to ensure that modern slavery, child labour and human trafficking are not taking place in their supply chain, or in any part of their business. Compliance audit trails must be retained.

No single business can tackle modern slavery on their own, we want to work with our suppliers in a trusting and open relationship to address this issue. As such, suppliers must:

- ▶ Comply with all applicable laws, codes and regulations wherever they operate;
- ▶ Promptly notify SUEZ of any significant criminal or civil legal actions brought against them; and
- ▶ Promptly notify SUEZ of any fines or administrative sanctions brought against them which relate in any way to the requirements set out in this supplier code of conduct.

Inclusion and diversity

SUEZ is a place of mutual trust and respect. We embrace diversity and promote the importance of inclusion amongst all of our employees. Everyone is of value and has the right to be their authentic self at work and be free from harassment. We do not tolerate any form of discrimination. Everyone should be fairly rewarded for their skill, contribution, and performance. Suppliers are expected to live by these standards and create a working environment free from physical, psychological, and verbal harassment or other abuse.

Suppliers should not engage in any type of individual or collective blacklisting.

Suppliers are expected to comply with all legislation and guidelines which promote equality of treatment and opportunities regardless of sex, race, colour, age, disability, gender, sexual orientation, religion, political affiliation, marital status, caring responsibilities, ethnic origin, or union membership.

Suppliers are also encouraged to actively promote the benefits of inclusion and diversity amongst all their employees.

The rights of workers to exercise a right of free association is to be respected.

Social value

We recognise our responsibilities to our people, neighbours and the local communities where we work.

The SUEZ core value of respect inspires us to value diversity and the social impact we can achieve, and to act with integrity at all times. Our activities create social value. We can now quantify these benefits at project, community and company level, which informs our decision-making and our stakeholders.

Suppliers operating at our sites should employ and train local people where possible.

Suppliers are expected to commit to training and developing their own employees of all ages, abilities and backgrounds.

Suppliers are expected to also recognise their own responsibilities and be taking a proactive approach to continually improve their social impact. They are also expected to report on their progress, especially when it relates directly to the work they do for SUEZ.

Sustainable environment

Protecting the environment is at the heart of what SUEZ does. Environmental responsibility is embedded in our business model and strategy as we sustain the value of resources, conserve natural capital and enable the low-carbon economy.

Our values – notably, passion for the environment – underline this. In all our services, we strive to go beyond regulatory compliance by surpassing environmental standards wherever we operate, reducing our resource use and decarbonising our activities. We expect the same values and standards to be shared by our Suppliers.

Suppliers are expected to understand their carbon footprint and work with us to identify low carbon materials and services to reduce or eliminate operational greenhouse gas emissions.

Suppliers should understand climate related risks and support supply chain efforts to build resilience against the adverse effects of climate change.

Suppliers should minimise waste and material use and promote waste prevention, re-use and recycling over recovery and ultimately disposal. We will give preference to products and services with the greatest circular economy benefits.

Suppliers may be required to actively support our decarbonising policy by providing reliable data on their carbon impacts and all Suppliers will be encouraged to reduce these impacts over time.

SUEZ is proud of its sustainable procurement policy and we expect our suppliers to behave in a way that actively complies with that Policy.

Monitoring and compliance

We take pride in our supply chain and in selecting suppliers take steps to ensure we are contracting with reputable organisations. All checks are carried out in accordance with best practice guidelines. We expect supplier performance to be in the spirit of collaboration. We expect our suppliers, wherever they operate, to act in a responsible and ethical way.

Accordingly, suppliers must ensure that all your workers, agents and permitted subcontractors are aware of the requirements of this supplier code of conduct.

Please contact the procurement department if you have any questions about this supplier code of conduct.

We reserve the right to monitor and audit each supplier's compliance with this supplier code of conduct. In the event that the expectations of this supplier code of conduct are not met, the business relationship may be reviewed and corrective actions pursued subject to the terms of the particular contract. Potential consequences may include but are not limited to contract termination.