



OES GROUP



POLICY

SUPPLIER CODE OF CONDUCT (SCoC)

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Introduction

This document outlines the principles and standards we expect all our suppliers to adhere to while conducting business related to OES Group Ltd.

Our commitment to integrity, fairness, and responsibility must be mirrored in the actions and policies of our suppliers to maintain a sustainable and ethical supply chain.

1. Objective & Scope

This Supplier Code of Conduct & Ethics aims to set the minimum requirements for all suppliers to conduct business with OES Group and to ensure that our business operations align with our organisational values and comply with all applicable laws and regulations.

2. The Purpose

Adherence to this Code is mandatory for all suppliers who wish to establish and maintain a business relationship with OES Group Ltd. Non-compliance may result in a re-evaluation of our partnership and potential termination of contracts.

3. Compliance with Laws and Regulations

All suppliers must comply fully with all local, national, and international laws applicable to their business operations. This includes, but is not limited to:

3.1. Labour & Employment Laws and Regulations

Ensuring fair treatment of workers, appropriate wage laws, and workplace safety. In particular, the supplier shall:

- **not be complicit in human rights violations** within his sphere of influence;
- **not engage in or benefit from any form of child labour**, and in particular not employ any workers below 15 years of age (below 14 years of age in certain developing countries) or a higher minimum age according to national legislation in line with ILO Convention 138 on Child Labour;
- **not engage in or benefit from any form of forced or involuntary labour;**
- **ensure that no forms of modern slavery or practices similar to slavery are practised;**
- **ensure that security personnel working on the supplier's premises act in accordance with generally accepted human rights standards;**
- **not practice any form of discrimination** in hiring and employment practices on the grounds of race, colour, ethnic origin, religion, nationality, gender, sexual orientation, age, physical ability, health condition, political or social

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opinion, union membership, or marital status. Unequal treatment includes, in particular, the payment of unequal remuneration for work of equal value;

- **pay all workers at least the minimum wage required by law** or applicable industry regulations (such as collective bargaining agreements or the like);
- ensure that employment conditions, including annual leave, working time, and leave periods, are consistent with mandatory standard laws or applicable industry regulations;
- **ensure that the workplace is safe and contains no health hazards** - according to the local requirements, establish appropriate organizational structures and procedures for the effective management of health and safety risks, and train employees on these procedures. Suitable procedures and plans shall be developed and published.

3.2. Environmental laws

OES Group Ltd is committed to sustainability and expects its suppliers to share this commitment. We expect our suppliers to meet or exceed the requirements set forth in the applicable environmental laws and regulations. The supplier is responsible for managing, measuring, and minimizing the environmental and social impact of his facilities, products and projects.

Specific focus areas include reduction of air emissions; waste reduction, recovery, and management; water use and disposal; and greenhouse gas emissions. In particular, the supplier shall:

- **obtain and maintain the required permits and licenses** and comply with the reporting requirements set forth therein;
- **use natural resources sparingly and conserve them where possible.** The use of natural resources shall be reduced through practices such as recycling, and through changes in production processes. All in the supply chain shall be committed to the continuous development and use of environmentally and climate friendly products, processes and technologies;
- **endeavour to avoid or reduce waste or emissions** resulting from his business activities and dispose of waste in a legal and responsible manner. The supplier undertakes not to import or export hazardous waste
- **install an environmental management system** (e.g., ISO 14001 or equivalent) at his worksites to make sure that measures are implemented to protect the environment and to be compliant in all processes concerned;

3.3. Anti-corruption laws

OES Group Ltd requires its suppliers to conduct business with integrity and in compliance with legal requirements and to adhere to internationally agreed standards of business ethics. In particular, the supplier shall:

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- **comply with all applicable laws and regulations** in the country where he carries out his business activities;
- **not engage in or tolerate any form of corruption, bribery, extortion or embezzlement.** In particular, suppliers shall not directly or indirectly engage in or tolerate any form of granting a payment or anything of value in favour of government officials and employees of business partners with the purpose of influencing decision-making in violation of the law. Suppliers' compliance management systems must comply in substance with the U.K Bribery Act, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. This means that suppliers may not offer, promise, give, or authorise any sort of bribe or kickback in order to obtain or retain business or any improper business advantage;
- **comply with antitrust and fair competition laws.** In particular, it must be ensured that suppliers do not discuss topics that could violate, or appear to violate, competition laws by price-fixing; terms of sale; bid-rigging; division of markets, territories or customers; tying and bundling products; using deceptive trade practices; or abusing a dominant market position;
- **avoid conflicts of interest,** in particular, by disclosing any financial interest that an OES Group Ltd employee may have in the supplier and by not offering or granting directly or indirectly any benefit to an employee of OES Group Ltd with a view to obtaining business from OES Group Ltd Suppliers may not influence or attempt to influence OES Group Ltd employees or their family members by providing them with gifts, favours, entertainment, personal benefits, or preferential treatment that is beyond a modest and/or reasonable dimension and which cannot clearly be considered a culturally acceptable display of business manners or hospitality. However, no gift or favour must be given that could be interpreted as being intended or is intended to influence the objective decision-making process by our employees;

Suppliers must also maintain adequate records to demonstrate compliance with these laws and must furnish these records upon request by OES Group Ltd.

4. Gifts and Hospitality

Limiting of gifts and hospitality exchanged to those that are reasonable, modest, and consistent with customary business practices.

OES Group Ltd and its employees cannot accept gifts with a monetary value of more than £50 in line with OES Group's **Fraud, Bribery & Corruption Policy**

5. Monitoring and Compliance

Regular monitoring is an important element of our supplier compliance program. The supplier may, therefore, be invited to complete a supplier compliance questionnaire in order to give more details on his compliance management system.

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All information will be handled sensitively and used only for its proper purpose. However, confidentiality cannot be guaranteed as information might have to be disclosed where an issue results in formal proceedings.

Under the Data Protection Act 1998 individuals have the right to see their own personal data held subject to the rights of confidentiality of any third parties involved in that information

6. Reporting Violations

If you as a supplier become aware of a violation of this Supplier Code of Conduct & Ethics, you should report such violation to us (see section below for our compliance contacts).

Suppliers must promptly report any breaches of this Code, including any illegal or unethical behaviour encountered in their supply chain, to OES Group Ltd

OES Group Ltd reserves the right to terminate any agreements with suppliers that fail to comply with this Code of Conduct. Continued partnership is contingent upon a supplier's commitment to these principles and their continual improvement efforts in aligning with these standards.

If you wish to report any violations, please see/request the OES Group [Whistleblowing Policy](#)

7. Agreement

By engaging in a business relationship with OES Group Ltd, suppliers acknowledge that they have read, understood, and agreed to comply with this Supplier Code of Conduct. Suppliers are encouraged to educate their staff and subcontractors about the principles contained within this document to ensure widespread compliance and adherence.

OES Group Ltd appreciates the efforts of all suppliers to uphold these ethical standards and looks forward to a fruitful and long-lasting business relationship based on mutual respect and integrity.

All suppliers will be requested to acknowledge and accept the OES Group Ltd Supplier Code of Conduct & Ethics in writing. For this purpose, please use the 'Supplier Declaration Form-(SCoC) (Appendix i)

8. Declaration of Supplier's Acknowledgement & Acceptance Form**Declaration of Supplier's Acknowledgement & Acceptance
of the OES Group LTD Supplier Code of Conduct**

Name of Supplier	
Company Registration Number	

On behalf of the Supplier, it is herewith confirmed that:

- the Supplier has received and read a copy of the OES Group Ltd Supplier Code of Conduct (SCoC)
- the Supplier undertakes to comply with the Supplier and agrees that it shall form the basis of present and future business with OES Group Ltd and its affiliates
- this SCoC shall form part of any agreement entered into between the Supplier and OES Group Ltd
- the Supplier may be asked again to reconfirm his compliance with this SCoC when entering into a contract with OES Group Ltd
- the Supplier shall be held responsible for ensuring compliance with the SCoC by their employees, company representatives, as well as subcontractors and any business partners that the Supplier is using to supply products and/or services when doing business with OES Group Ltd T

The signatories hereby acknowledge that (a) they are authorised representative(s) of the Supplier, and (b) they are permitted to make these undertakings on behalf of the Supplier.

Date:

Company stamp:

Signature(s):

Name(s) (in BLOCK CAPITALS),

Function(s)/Position(s) (in BLOCK CAPITALS)