GLOBAL SUPPLIER CODE OF CONDUCT

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Contents

1. Introduction

At Davies, we pride ourselves on being a reputable business, committed to upholding high ethical and professional standards in everything we do, consistent with our Davies values and principles.

In turn, we recognize the importance that our suppliers play in achieving our business goals. Davies seeks to partner with likeminded Suppliers, in delivering value-for-money procurement for Davies and our customers, in a responsible and sustainable way.

The Supplier Code of Conduct sets out our expectations of suppliers, generally in terms of business practices, and specifically regarding:

- Ethical supply and people practices including diversity and inclusion
- Prevention of financial crime
- Operational Resilience & Third-Party Risk
- Sustainable environmental responsibility
- Data protection and information security
- Artificial intelligence
- Health and Safety

Davies procures goods and services from many suppliers, and the firm recognizes that each supplier may have their own standards and ambitions for the above. We expect all our suppliers to meet the requirements set out in legislation, regulation, and good industry practice and to ensure that their suppliers do the same.

Together, the Davies Procurement Policy and Supplier Code of Conduct define the organisation's commitments, outline our expectations of suppliers, and set out the outcomes we aim to achieve through collaborative working.

Davies reserves the right to amend this Code to align with applicable law and/or because of new policy objectives. Davies will notify you if this Code changes and continued provision of goods and/or services following such notification shall be deemed acceptance of the new Code

2. Davies Commitment to Suppliers

2.1. Business Conduct

When carrying out procurement duties and responsibilities, all Davies employees are expected to share with Suppliers the company's commitments to behave ethically, apply high standards of corporate conduct and to fully comply with all relevant laws.

Our Procurement Policy sets out the expected norms of behaviour in the way that Davies conducts supplier engagement and management.

2.2. Supplier Relationship Management

Davies has established methodologies, processes, and support systems to conduct professional relationships with suppliers. Ensuring a fair, competitive, and transparent trading relationship, according to our policies and values.

3. Our Expectations of Suppliers

3.1. Compliance with Laws

Suppliers must comply with the laws and regulations in the countries where they operate. Davies also expects suppliers to follow the standards set out in this Code. Where our expectations go further than local legal requirements, suppliers are encouraged to follow the higher standard. If local law prevents a supplier from meeting any part of this Code, the supplier must let Davies know so we can agree a suitable way forward.

3.2. Sub-contractors and Supply Chain

Suppliers are responsible for ensuring that any sub-contractors or third parties engaged in delivering goods or services to Davies operate to standards consistent with this Code and applicable law. Suppliers remain accountable for the actions and omissions of such parties in connection with services provided to Davies.

3.3. Business Regulation and Ethics

Davies expects its suppliers to abide by the following:

Regulatory Cooperation

Where issues arising from services provided to Davies result in regulatory enquiries or investigations, suppliers are expected to cooperate appropriately with Davies and relevant authorities, subject to applicable law.

Anti-bribery and Corruption

Davies has a zero-tolerance approach towards any instance of bribery and corruption. Suppliers must ensure they do not engage in any form of corruption, bribery, facilitation payments or fraud. Suppliers must act with integrity in all interactions and should avoid situations where personal, financial, or other interests could improperly influence business decisions. Suppliers shall not offer any gifts or other benefits to Davies employees, and / or anyone acting on Davies's behalf that could improperly influence that employee or person. Davies also prohibits anyone from engaging in bribery and corruption on our behalf.

Conflict of Interest

Suppliers must avoid situations where a conflict of interest may occur. They must immediately disclose to Davies any conflict of interest that does arise. Examples of conflicts of interest may include; where a supplier's employee may have an interest or business relationship of any kind with Davies business or where that supplier may be acting on behalf of Davies and / or a competitor of Davies.

Anti Money Laundering & Terrorist Financing

Suppliers must conduct business in a lawful and transparent manner and must not engage in, facilitate, or enable any form of money laundering, terrorist financing, or illicit financial activity. All transactions related to work undertaken for Davies must be legitimate, accurately recorded, and supported by appropriate documentation. Suppliers are expected to maintain controls that help identify and prevent suspicious financial behaviour and must ensure that payments are made only through verified and lawful banking channels.

PEPs and High-Risk Public Officials

Suppliers must identify and appropriately manage any risks arising from interactions with Politically Exposed Persons (PEPs) or individuals with prominent public functions. Where a supplier becomes aware that personnel involved in work for Davies are PEPs, former PEPs, or close associates or family members of PEPs, this should be disclosed to Davies so that any associated risks can be assessed and managed appropriately. Suppliers must ensure that such relationships do not influence, or appear to influence, decisions made in connection with services provided to Davies.

Sanctions, Export Controls & Responsible Trade

Suppliers must follow all sanctions, trade restrictions, and export control rules that apply to their activities. This includes avoiding dealings with restricted individuals, companies, or locations, and making sure goods, services, and technology are used for lawful purposes. Suppliers should have reasonable steps in place (e.g. screening, due diligence and oversight to check for sanctions risks and must inform Davies immediately if anything concerning is identified.

Fraud Prevention, Economic Crime & ECCTA

Davies expects suppliers to support our commitment to preventing fraud and other forms of economic crime. This includes acting honestly, keeping accurate records, operating transparently, and having practical measures in place to reduce the risk of wrongdoing. Where a supplier's activities connect to Davies's UK operations, customers, or services, we expect them to take extra care to ensure their controls remain strong, recognising that certain UK standards — including those introduced under the Economic Crime and Corporate Transparency Act (ECCTA) — may apply in these situations. Suppliers must raise any concerns about suspected fraud or economic crime with Davies promptly so that issues can be addressed quickly and responsibly.

Whistleblowing, Speak Up & Non-Retaliation

Suppliers must support an environment where people can speak up about concerns — such as unethical behaviour, suspected fraud, or breaches of this Code — without fear of retaliation. Concerns should be taken seriously and investigated appropriately. Any significant issue involving work for Davies must be shared with us promptly. No one should ever be punished or disadvantaged for raising a concern in good faith.

Breach of Code Notification
Suppliers must promptly notify Davies if they become aware of any actual or suspected breach of this Code that could reasonably affect Davies, its customers, or its regulatory obligations. Suppliers are expected to cooperate in good faith to investigate and remediate any such breaches.

Fair Competition
Suppliers must engage in fair business practices, avoid anticompetitive conduct (price-fixing, bid rigging, collusion), and compete responsibly and in compliance with all applicable competition laws.

Private and intellectual property
In conducting all activities, suppliers are expected to make appropriate use of personal data and confidential information and ensure that all intellectual property rights are respected and ensure appropriate levels of security and privacy controls are adopted.

3.4. Audit, Assurance and Cooperation

Suppliers are expected to cooperate with reasonable requests from Davies for information, assurance, or audit activities related to compliance with this Code, applicable laws, or contractual obligations. This may include providing relevant records, evidence, or access to appropriate personnel, subject to applicable law and confidentiality requirements. We expect the supplier to maintain written records to demonstrate compliance with this Code.

3.5. Labour & Human Rights

Davies supports the Universal Declaration of Human Rights and its implementation through the United Nations (UN) Guiding Principles on Business and Human Rights. As such, and in accordance with our People Management Policies, we expect suppliers to respect all human rights, including labour rights, throughout their business activities.

Equality and Non-Discrimination
Suppliers are required to promote a fair and equitable work environment that is free from discrimination and harassment for all employees. This shall extend to ensure that the terms of employment and its employment practices do not discriminate upon grounds of gender, race, and / or any other characteristic protected by applicable local law.

Modern Slavery

Suppliers must prevent all forms of modern slavery from taking place in their operations, including forced and compulsory labour, bonded labour, and human trafficking.

Child Labour
Suppliers must ensure their operations are free from the exploitation of child labour. Child labour, as defined by the International Labour Organization (ILO), refers to work that is mentally, physically, socially, or morally harmful to children; or work that interferes with their schooling.

Freedom of Association and Collective Bargaining
Suppliers must respect the right of employees to join trade unions, and associations and assemble freely without fear of reprisal, intimidation, or harassment.

Rights of Local Communities
Suppliers must respect the land, resource and cultural rights of local communities and indigenous groups.

3.6. Health, Safety and Quality

Suppliers are required to prevent and manage health and safety risks associated with their activities, products, and services, ensuring compliance with relevant legislation, industry regulations, and best practices.

Workplace Health and Safety
Suppliers are required to implement effective health and safety prevention and remediation policies and procedures which comply with industry, national and international standards as well as Davies's health and safety requirements. This also includes taking reasonable care to ensure all workers are protected against processes, substances and work methods which are unsafe.

Work Environment and Housing Facilities
Suppliers must provide a safe, clean, comfortable, and hygienic working environment and, if applicable, residential, or overnight facilities that meet the basic needs of the workers.

Product Safety and Quality
Suppliers are required to deliver products and services that meet the needs of Davies and that are in line with recognized and contractually agreed safety and quality requirements as well as (as a minimum) comply with the local laws in the country in which they are provided to Davies (see further the section titled "Compliance with laws" above).

3.7. Environmental Responsibility

We expect all suppliers to minimise the environmental impact of their operations, products, and services, in line with our Environmental Policy and Responsible Business Policy.

As Davies, we have committed to cut our carbon emissions in half by 2030 and to reach carbon net-zero by 2050. This target is validated by the Science-Based Targets initiative (SBTi). In order to meet this goal and comply with reporting, we will increasingly expect suppliers to measure, report, and reduce their carbon footprint. Suppliers should begin tracking emissions and work towards clear, credible reduction actions. For support with this please reach out to our Responsible Business Team – responsiblebusiness@davies-group.com

Resource Use, Pollution Prevention & Climate Action
Suppliers must demonstrate how they manage, measure, and minimise the environmental impacts of their operations, including greenhouse gas emissions, waste, energy use, and

water consumption. They should actively implement pollution-prevention practices and contribute to climate-change mitigation across their value chain.

Environmental Standards & Compliance
Suppliers are required to comply with all relevant environmental laws, as well as our corporate and site-specific environmental standards when operating on Davies sites.

3.8. Information Security and Confidentiality

Suppliers are expected to maintain appropriate standards of information security and confidentiality to protect the organisation's data, systems, and services. This includes implementing proportionate controls to prevent unauthorised access, disclosure, alteration, or loss of information, and ensure that all data is handled securely and in accordance with applicable legal, regulatory, and contractual requirements.

Suppliers must:

- Protect confidential, sensitive, and proprietary information, against unauthorised access, disclosure, alteration, loss, or destruction.
- Use information solely for agreed and lawful purposes.
- Implement appropriate administrative, technical, and physical controls proportionate to the nature of the data and services provided.
- Restrict access to authorized personnel on a need-to-know basis
- Promptly report any actual or suspected information security incidents without delay and within a defined timeframe agreed contractually.

3.9. Records and Evidence

Suppliers are expected to maintain appropriate records and documentation to demonstrate compliance with this Code and applicable legal or regulatory obligations, and to retain such records in accordance with applicable law.

3.10. Data Protection and Privacy

We expect our suppliers to handle personal data with integrity, transparency, and respect, in line with our commitment to high standards of privacy, compliance, and ethical data use. Our suppliers play a critical role in enabling us to innovate and operate confidently while maintaining the trust of our customers, colleagues, and partners.

As trusted partners, our suppliers are expected to:

- Understand, interpret, and comply with applicable global privacy laws and regulatory requirements relevant to the services they provide
- Collect, use, and process personal data responsibly, only for agreed and legitimate purposes
- Embed privacy-by-design and data protection principles into products, systems, and operational processes
- Support effective incident management, including prompt notification, investigation, and mitigation of privacy and data protection risks
- Maintain robust governance, security, and accountability frameworks to safeguard personal data throughout the data lifecycle

We expect suppliers to work collaboratively with us, proactively raising risks and improvement opportunities, and integrating privacy principles into everyday decision-making. By doing so, our suppliers help ensure we not only meet regulatory expectations but also consistently earn and maintain trust in every interaction.

Where personal data is processed, Suppliers must:

- Comply with all applicable data protection and privacy laws, including but not limited to, relevant jurisdictional, federal, state, and provincial regulations.
- Register with the relevant regulator where applicable and provide a durable medium to inform data subjects of processing activities as necessary
- Have a point of contact within the business responsible for all privacy matters, relevant to the business arrangement
- Process personal data only as defined by the contractual relationship
- Ensure all personnel and relevant parties, authorised to process personal data, are bound by enforceable confidentiality and data security obligations
- That any data transfers conducted on a regular or ad hoc basis, outside of the jurisdiction of origin, are agreed by Davies prior to transfer
- Ensure any suspected or confirmed breaches of personal data are communicated to Davies without undue delay
- Promptly provide support to Davies in addressing any data privacy impacts arising from any actual or suspected incidents of the: unauthorised access, loss, theft, or deletion of personal and Davies client data
- Provide prompt support for data subject or regulatory requests to ensure compliance with data protection laws

3.11. Access to Systems and Assets

Suppliers must ensure that access to the organisation's systems, networks, and assets is strictly controlled and limited to authorised individuals on a need-to-know and least privileged basis. Appropriate authentication mechanisms including muti factor authentication where applicable must be used, and access rights must be regularly reviewed and promptly revoked when no longer required. Suppliers are responsible for preventing unauthorised access and ensuring that all access is appropriately monitored and managed.

Suppliers must:

- Use organisational systems, applications, and assets only as authorised.
- Use approved devices, software, and services where required
- Protect authentication credentials and not share user accounts
- Return or securely destroy assets and information upon termination

3.12. Resilience/Incident Management

We expect our suppliers to maintain their services to us in the event of disruption and continue to provide services. We expect the supplier to have a Business Continuity Plan and IT Service Recovery Plan which must have the following:

- A plan that has been approved by senior management
- A plan that has been exercised and demonstrates that your business restores services within 24 hours

In the event of disruption, we expect to be notified to the Davies point of contact and by email tprm@davies-group.com as soon as practically possible but within 24 hours.

3.13. Artificial Intelligence (AI)

Suppliers using AI, machine learning, or other automated technologies in delivering products or services to Davies are expected to do so responsibly, lawfully, and with appropriate care. They should be transparent about any material use of automation, particularly where it influences outcomes or decisions connected to Davies.

Suppliers should maintain effective governance over their AI use, with clear accountability for how systems are designed, deployed, and monitored. AI used in service delivery should operate in ways that are fair, accurate, secure, and respectful of individual rights.

To support this, suppliers should:

- Identify and manage key risks associated with automation, such as bias, errors, explainability, or over-reliance on automated outputs.
- Ensure appropriate human oversight, especially where AI may have a meaningful impact on people or business decisions.
- Apply equivalent AI standards across their supply chain, including where sub-contractors or third parties provide AI-enabled components.

Suppliers should update Davies about any significant issues, changes, or incidents relating to their AI use that could affect services. Any more detailed requirements (e.g., contractual terms) will be communicated separately.

3.14. Non-Compliance and Remediation

Where a supplier fails to meet the expectations set out in this Code, Davies expects the supplier to take timely and appropriate corrective action. Persistent or serious breaches of this Code may affect the supplier's relationship with Davies, including the application of contractual remedies where applicable. A breach of this Code shall be a material breach giving Davies a right to terminate the contract

4. Acknowledgement

Acknowledgement of the Supplier Code of Conduct is a prerequisite in every Davies contract for supply. Through the signature of the contract and acceptance of the purchase order, the supplier confirms that its operations fulfil the requirements contained in this Code and it shall be deemed incorporated and form a part of any contract or relevant order with Davies. Davies supply contracts may contain more specific provisions addressing some or all of the issues set out in this Code. If there is any inconsistency between this Code and any requirement of the contract, Suppliers must comply with whichever requirement is the most stringent.

5. Document Control and Approval

5.1. Change History

Version	Author	Details of Change
6.0	B Paterson	Annual review (Legal Approved Version)

5.2. Approval

Effective Date	07-May-2026
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Document Owner	Group Enterprise Risk & Resilience
Approved By	Benjamin Paterson, Group Operational Resilience & Continuity Director

5.3. Review

This document is subject to annual periodic review. This document may also be subject to ad hoc review. The latest version of this document will be published on the Group Intranet or available from Group Compliance on request.

The review process and audit history for this document is managed on the Group Policy Management Platform. Document review and approval audit history can be provided by Group Compliance on request.