



## Supplier Code of Conduct

### Purpose and Scope

1. This Supplier Code of Conduct (“Code”) sets out the ethical, social, environmental, and governance minimum standards expected of all suppliers, subcontractors, agents, and any third parties providing goods or services (“Suppliers”) to Wernick Group (Holdings) Limited, all subsidiaries, and group companies, namely, S Wernick & Sons (Holdings) Ltd, Wernick Buildings Ltd, Wernick Construction Ltd, Wernick Hire Ltd, Wernick Events Ltd, Wernick Refurbished Buildings Ltd, Wernick Power Solutions Ltd, Wernick AV Danzer Ltd and Rawley Plant Hire Ltd (collectively “the Wernick Group”).
2. The purpose of this code is to protect human rights, promote fair and ethical business practices, minimise environmental impact and ensure compliance with the law across the Wernick Group supply chain.
3. The Wernick Group operates in the modular and portable building industry and operates across factory manufacturing environments and live construction sites. In addition to all contractual obligations, compliance with this Code is a condition of doing business with us, and we expect our Suppliers to uphold these standards through their own supply chains.

### Legal Compliance and Ethical Business Conduct

4. **Compliance with Laws.** Suppliers must comply with all applicable laws, regulations, and codes of practice, including but not limited to:
  - a. Health and Safety law
  - b. Building Regulations and fire safety legislation
  - c. Product safety and construction product regulations
  - d. Environmental protection laws
  - e. Employment and equality legislation
  - f. Competition law
  - g. Fraud and anti-corruption laws.
5. **Business Integrity and Anti-Corruption.** Suppliers must conduct business with honesty, integrity, and transparency. Bribery, corruption, facilitation payments, fraud, tax evasion, deception, dishonesty, or any other unethical business practices are strictly prohibited. Suppliers must promptly disclose any conflicts of interest. Accurate records must be maintained to demonstrate compliance with contractual and regulatory obligations and made available upon reasonable request.

## **Human Rights, Labour Standards and Modern Slavery**

6. **Modern Slavery and Human Trafficking.** Suppliers must not use forced, bonded, or involuntary labour, nor engage in human trafficking or modern slavery. Additionally, workers must not be employed below the legal minimum working age. Suppliers are expected to have appropriate policies and controls in place to identify and prevent modern slavery within their operations and supply chains.
7. **Fair Treatment, Employment Practices and Equal Opportunities.** Suppliers must treat all workers with dignity and respect. Discrimination, harassment, bullying, or abusive behaviour is not tolerated. Employment decisions must be based on merit and capability. Wages, benefits and working hours must meet or exceed legal requirements.

## **Health, Safety and Wellbeing**

8. **Safe Working Environments.** Suppliers must provide safe and healthy working environments and be proactive in reducing hazards and preventing accidents. This includes adequate training, supervision, equipment, risk assessments, systems of work, incident investigation and reporting systems.
9. **Conduct on Sites and Premises.** Suppliers must report to the site office or reception for induction, follow site rules and operate relevant safe systems of work.
10. **Wellbeing and Welfare.** Suppliers are encouraged to promote physical and mental wellbeing, including fatigue management, welfare facilities, and access to support where appropriate.

## **Quality, Technical Compliance and Product Assurance**

11. **Quality Management.** Suppliers must operate effective quality management systems appropriate to the scope of work. Products and services must meet agreed specifications, drawings, and performance requirements.
12. **Product Compliance.** All materials, components, and systems supplied for modular buildings must comply with relevant British and European Standards (BS EN) and Building Regulations, be correctly tested, certified, and traceable. Suppliers must provide declarations of performance, test evidence, and technical documentation when required.

## **Environmental Responsibility and Sustainability**

13. **Environmental Compliance.** Suppliers must comply with all applicable environmental legislation and adopt practices to reduce waste, emissions and pollution where feasible.
14. **Sustainable Practices.** Suppliers are encouraged to support the environmental benefits of modular construction and pursue continual improvement in environmental performance through energy efficiency, waste minimisation, responsible sourcing of materials, and other sustainability initiatives.

### **Fair Dealing & Supply Chain Responsibility**

15. **Fair Treatment of Sub-Suppliers.** Suppliers must treat their sub-suppliers fairly, without passing unreasonable risk or payment terms that threaten their viability.
16. **Responsible Sourcing.** Suppliers are expected to apply the principles of this Code throughout their own supply chains and to take reasonable steps to ensure compliance by sub-suppliers.

### **Confidentiality and Data Protection**

17. Suppliers must protect confidential and commercially sensitive information and comply with data protection laws where applicable. Information must be used only for legitimate business purposes.

### **Monitoring, Reporting and Corrective Action**

18. **Compliance Monitoring.** Suppliers must cooperate with audits, assessments, or requests for documentation relating to compliance with this Code or contractual obligations.
19. **Reporting Concerns.** Suppliers must promptly report any actual or suspected breaches of this Code, applicable law, or safety-critical issues. Confidential reporting channels must be made available to workers.
20. **Corrective Action.** Where non-compliance is identified, Suppliers must implement corrective actions within agreed timescales. Serious or repeated breaches may result in suspension or termination of the business relationship.

### **Wernick Group Policies**

21. Our relevant Policies can be found on the Wernick Group website.

### **Acknowledgement**

22. By supplying goods or services to the Wernick Group, Suppliers acknowledge and agree to comply with this Supplier Code of Conduct. Suppliers are required to flow down these requirements to their subcontractors and business partners and ensure their compliance.

**Effective date:** 16<sup>th</sup> June 2026