CITY & ESSEX

2026

Supplier Code of Conduct

Document Reference: C 002
Version: V1.0



Effective Date:	October 2026	Review Date:	October 2027

1.PURPOSE

This Supplier Code of Conduct sets out the minimum environmental, social, ethical, health and safety, human rights and reporting standards expected of suppliers, subcontractors, service partners and other third parties providing goods or services to City & Essex.

City & Essex seeks to work with suppliers who act responsibly, comply with applicable laws, support our clients, protect workers, reduce environmental impact and contribute to long-term responsible business performance.

2. SCOPE

This Code applies to suppliers, contractors, subcontractors, consultants, service partners, product providers and any other third parties providing goods or services to City & Essex Limited and all affiliated subsidiaries. It applies to both direct supplier activity and, where relevant, the supplier's own subcontractors and supply chain.

This Code is effective from May 2026. Suppliers will be asked to acknowledge this Code during onboarding, contract renewal or scheduled supplier review. Existing Supply Chain Charter acknowledgements remain valid transition evidence until suppliers are migrated to this updated Code.

3. RELATIONSHIP WITH THE SUPPLY CHAIN CHARTER

City & Essex has historically communicated supplier ESG expectations through its Supply Chain Charter. In 2026, this framework was separated into two documents: the Sustainable Procurement Policy, which sets out City & Essex's internal procurement commitments, and this Supplier Code of Conduct, which sets out external supplier requirements.

Existing signed Supply Chain Charters will be retained as evidence of supplier engagement while strategic suppliers are asked to acknowledge this updated Code during the 2026 supplier review cycle.

4. FRAMEWORK AND LEGISLATION

- Modern Slavery Act 2015.
- Bribery Act 2010 and Criminal Finances Act 2017.
- Equality Act 2010.
- Health and Safety at Work etc. Act 1974.
- Environmental Protection Act 1990 and Environment Act 2021.
- UK GDPR and Data Protection Act 2018.
- International Labour Organisation principles on forced labour, child labour, working time, wages and non-discrimination.
- UN Guiding Principles on Business and Human Rights.
- ISO 20400:2017 Sustainable Procurement guidance.
- Greenhouse Gas Protocol & Science Based Targets initiative principles where emissions data is relevant.

5. SUPPLIER REQUIREMENTS

1. Business Conduct and Ethics

- Suppliers must act with honesty, integrity and transparency in all dealings with City & Essex, our clients and other stakeholders.
- Suppliers must not engage in bribery, corruption, fraud, tax evasion, money laundering, facilitation payments or improper inducements.
- Suppliers must identify and manage actual or potential conflicts of interest and report any concern that may affect fair decision-making.
- Suppliers must protect confidential information, commercial information and personal data handled in connection with City & Essex business.
- Suppliers must comply with applicable competition, advertising, data protection and financial crime laws.
- Suppliers are expected to operate fair and prompt payment practices across their own supply chain and to treat their subcontractors and service partners responsibly.

2. Labour Standards and Human Rights

- Suppliers must not use forced labour, bonded labour, trafficked labour, prison labour where unlawful, or any form of modern slavery.
- Suppliers must not use child labour and must comply with applicable minimum age requirements.
- Suppliers must not charge recruitment fees to workers and should ensure recruitment practices do not create worker debt or dependency.
- Suppliers must pay workers legally compliant wages and comply with applicable working time, rest break, holiday and overtime requirements.
- Suppliers providing labour to City & Essex sites or subcontracted services are expected to support fair pay practices and, where relevant to UK labour provision, work towards or maintain the Real Living Wage Foundation rate for directly employed staff.
- Suppliers must not discriminate on the basis of protected characteristics and must provide a workplace free from bullying, harassment and victimisation.
- Suppliers must provide workers with accessible routes to raise concerns without retaliation.

3. Health, Safety and Wellbeing

- Suppliers must provide safe and healthy working conditions and comply with applicable health and safety law.
- Suppliers must maintain suitable risk assessments, safe systems of work, training, supervision and incident reporting arrangements relevant to the goods or services supplied.
- Suppliers providing goods or services to City & Essex sites must comply with site rules, client requirements, method statements and relevant HSEQ instructions.
- Suppliers must ensure equipment, products, vehicles and substances supplied are safe, suitable and supported by relevant information, including safety data sheets where applicable.

4. Environmental Impact and Climate

- Suppliers should comply with applicable environmental laws, permits and regulations.
- Suppliers should work to reduce energy use, greenhouse gas emissions, water use, waste, packaging and pollution associated with the goods or services supplied.
- City & Essex has an approved science-based target to reduce absolute Scope 1 and Scope 2 GHG emissions by 75% by 2030 from a 2019 base year, and to measure and reduce Scope 3 emissions. Strategic suppliers may therefore be asked to provide relevant environmental data, including Scope 1, Scope 2 and relevant Scope 3 emissions information, product impact data, waste data, packaging data or environmental certification evidence.
- Suppliers should support lower-impact products, reusable or refillable packaging, recycling routes, efficient logistics and circular economy principles where feasible.
- Suppliers providing chemicals or consumables must support safe use, correct handling, product information and lower-impact alternatives where appropriate.

5. Product Quality, Materials and Packaging

- Suppliers must provide goods and services that are reliable, safe, fit for purpose and consistent with agreed specifications.
- Suppliers should seek to reduce unnecessary packaging, avoid avoidable single-use materials and improve recycled, recyclable, reusable or refillable packaging options where feasible.
- Where environmental claims, recycled content, certifications or life cycle data are provided, suppliers must ensure the information is accurate, current and capable of being evidenced.

6. Local, Inclusive and Social Value Practices

- Suppliers are encouraged to support local employment, local sourcing, community impact, apprenticeships, skills development, inclusion and social value where relevant to the goods or services supplied.
- Where requested, suppliers should provide information that supports City & Essex social value reporting, including local spend, volunteering, employment or community impact data.

7. ESG Data, Assessment and Review

- Suppliers may be asked to complete supplier questionnaires, provide certifications, share EcoVadis scorecards, provide carbon or environmental data, or participate in supplier reviews.
- Suppliers must provide accurate information and notify City & Essex of material changes that could affect legal compliance, labour standards, environmental performance, information security, health and safety or service continuity.
- Suppliers should cooperate with reasonable requests for evidence, improvement plans or corrective actions linked to this Code.

6. SUPPLIER TIERS AND ESG EXPECTATIONS

City & Essex applies supplier expectations proportionately, taking account of annual spend, operational importance, ESG relevance and supplier maturity.

Tier	Indicative spend / relevance	Expected engagement
Strategic suppliers	Generally >£100k annual spend or high operational / ESG relevance	Supplier Code acknowledgement, ESG data requests, annual review, Scope 3 or product-impact collaboration where relevant.
Key suppliers	Generally £25k-£100k annual spend or moderate operational / ESG relevance	Supplier Code acknowledgement, proportionate ESG evidence and periodic sustainability review where relevant.
Operational / transactional suppliers	Generally <£25k annual spend and lower ESG risk	Basic compliance with legal, ethical, H&S and environmental expectations, with escalation where risk or impact increases.

7. NON-COMPLIANCE AND IMPROVEMENT

City & Essex favours practical engagement and improvement where suppliers demonstrate openness, urgency and a credible plan to resolve issues. Where a supplier fails to meet this Code, City & Essex may request further evidence, agree a corrective action plan, review the supplier relationship, suspend new work or terminate the relationship where appropriate.

Material breaches, including modern slavery, bribery, corruption, serious health and safety failings, data misuse or deliberate misrepresentation, may result in immediate escalation and termination where legally or contractually appropriate.

8. ACKNOWLEDGEMENT AND TRANSITION

Suppliers will be asked to acknowledge this Code during onboarding, contract renewal or scheduled supplier review. For EcoVadis and transition purposes, existing signed Supply Chain Charters will be retained as evidence of previous supplier ESG engagement while the updated Code is issued to strategic suppliers.

City & Essex will track acknowledgement of this Code through a Supplier Code of Conduct Acknowledgement Register, including supplier category, strategic tier, spend coverage, issue date and acknowledgement status.

9. RESPONSIBILITIES

Managing Director
Approves this Code and holds ultimate accountability for responsible business conduct.

Head of ESG
Owns the Code, coordinates supplier ESG expectations and maintains EcoVadis evidence linked to supplier sustainability.

Head of HSEQ
Supports supplier requirements linked to health, safety, environmental controls, chemicals, equipment and operational compliance.

Head of People & Culture
Supports supplier requirements linked to labour standards, equality, human rights and modern slavery.

Budget holders and supplier relationship owners
Issue the Code to relevant suppliers, support supplier review and escalate concerns.

Suppliers
Comply with this Code, provide accurate information and cooperate with reasonable review or improvement requests.

10. REPORTING AND REVIEW

This Code will be reviewed annually, or sooner where required by legislation, client requirements, EcoVadis reassessment, supplier risk, contract changes or material operational changes.

Supplier acknowledgements, supplier assessments, supplier certifications, corrective actions and relevant ESG data will be reviewed through supplier management, procurement governance, ESG Steering Group oversight or equivalent management review routes.

Business Name: **City & Essex Ltd**
Approved and Signed By: **Ian Hookway, Managing Director**
Approval Date: **October 2026**

Email: **ian@cityanessex.com**
Phone: **01268 776 476**

11. SUPPLIER ACKNOWLEDGEMENT

By acknowledging this Code, the supplier confirms that it has read, understood and agrees to work in line with the requirements set out above, subject to any agreed contractual terms.

Field	Details
Supplier organisation	
Authorised representative	
Position	
Signature / acknowledgement	
Date	