

**MACE LIMITED ("MACE")**  
**SUPPLIER CODE OF CONDUCT**

**INTRODUCTION**

Our values guide our behaviours as a business and should permeate everything we do, including our relationships with our suppliers. Mace is committed to being a responsible business that conducts our business safely and with integrity.

Our Code of Ethics sets out the standards of behaviour expected of us all in everything we do at Mace, forming the foundations of our culture.

Our Supplier Code of Conduct adds to our Code of Ethics. It sets out our high expectations of our suppliers. Please read the Supplier Code of Conduct, discuss it with your colleagues and contacts at Mace, and please live up to its standards and principles.

The Supplier Code of Conduct cannot cover every conceivable situation. Please exercise good judgement and ask yourself: "Is this the right thing do?" "Would I be happy if Mace knew?"

We are committed to working with our suppliers to improve ethical standards and conduct and we will only work with suppliers which seek to do likewise.

Mark Reynolds

## **TABLE OF CONTENTS**

1.	<b>WHO DOES THE SUPPLIER CODE OF CONDUCT APPLY TO?</b>	3
2.	<b>WHAT IS EXPECTED OF YOU?</b>	3
3.	<b>RAISING CONCERNS</b>	3
4.	<b>BRIBERY &amp; CORRUPTION</b>	3
5.	<b>CONFLICTS OF INTEREST</b>	4
6.	<b>ACCURATE RECORDS</b>	4
7.	<b>ANTI-FACILITATION OF TAX EVASION</b>	4
8.	<b>FAIR COMPETITION</b>	4
9.	<b>CONFIDENTIALITY</b>	5
10.	<b>DATA PROTECTION</b>	5
11.	<b>EQUALITY, DIVERSITY, BULLYING AND HARASSMENT</b>	5
12.	<b>MODERN SLAVERY AND HUMAN RIGHTS</b>	5
13.	<b>HEALTHY, SAFETY, WELLBEING AND ENVIRONMENT</b>	6
14.	<b>SANCTIONS AND EXPORT CONTROLS</b>	6
15.	<b>COMPLIANCE AND ETHICS</b>	6

## 1. WHO DOES THE SUPPLIER CODE OF CONDUCT APPLY TO?

Mace's Supplier Code of Conduct ("the Code") supplements our [Code of Ethics](#). It sets out the standards and practices that Mace expects all of its suppliers (including sub-contractors) to follow. Mace expects you, as one of its suppliers, to also apply these same standards and practices to the suppliers (and contractors) that you work with throughout your own supply chains.

## 2. WHAT IS EXPECTED OF YOU?

You are expected to comply with the principles set out in the Code, whilst also adopting practices similar to those in Mace's Code of Ethics. Failure to follow the principles set out in the Code may result in Mace ceasing to do business with you.

Mace is committed to carrying out business in accordance with all applicable laws in the territories in which it operates and conducts business. Where there are differences between local laws and the principles set out in this Code, Mace expects you to apply and follow whichever sets the highest standards.

It is important that you read and understand this Code and that you take time to think about how to ensure it is followed within your organisation and throughout your supply chain.

## 3. RAISING CONCERNS

We encourage our suppliers to report any concerns to us about compliance with the Code, the Code of Ethics or the law where those concerns are connected to Mace.

Generally you should first discuss the matter with senior management within your organisation, who in turn should feel confident to raise it with Mace's senior management.

Mace will take all reported matters seriously and will treat any concerns you have confidentially.

Mace will not tolerate retaliation, victimisation or discrimination against any person who has reported a suspicion or concern in good faith.

## 4. BRIBERY & CORRUPTION

Mace has a zero-tolerance approach to bribery in any way in connection with its business. Mace expects our suppliers to have in place procedures to prevent bribery and corruption by your employees and associated persons.

Specifically, Mace's suppliers and your employees/associated persons must **not**:

- bribe Mace's employees, contractors or staff;
- engage in acts of bribery from which Mace may be benefit;
- offer or give gifts, hospitality, contracts, payments or other personal advantages:
  - which are intended to influence a person working for Mace to favour you/the supplier or to conduct themselves other than in Mace's best interests;
  - which are intended to improperly influence other persons (for example, an employee of a Mace client or contractor) in connection with any contract or project involving Mace;
  - to influence a public official.

## 5. GIFTS AND HOSPITALITY

To foster good will or good working relationships our employees are permitted to accept or offer gifts or hospitality which are within the bound of recognised normal business practices and are not lavish or excessive. Gifts and hospitality offered and or accepted must be reasonable and proportionate in terms of value, frequency and timing. It is the responsibility on the supplier to ask the recipient(s) what the applicable limits are and to not exceed those limits.

## 6. CONFLICTS OF INTEREST

Suppliers must also avoid conflicts of interest and where a potential conflict of interest arises you must report it to Mace's senior management. Where a potential conflict of interest is disclosed, it is capable of being managed. Where it is not disclosed it will amount to a serious breach of this Code.

Specifically, suppliers must:

- **not** engage in any interaction with any Mace employee/contractor that may impact their ability to act in the best interests of Mace. For example, suppliers must not award contracts to businesses established by a Mace employee or a family member, spouse or partner of a Mace employee without disclosing the proposed contract to Mace and obtaining Mace's permission to proceed in writing;
- make Mace aware if any of your employees are a family relation of any Mace employee or if you have any other relationship with a Mace employee (or their family members) that may present a conflict of interest.

## 7. ACCURATE RECORDS

Suppliers must only present Mace and Mace's clients with accurate records. We do not tolerate fraudulent or deceptive practices. Specifically, suppliers must **not**, in any circumstances:

- submit inaccurate or inflated invoices or expenses;
- engage in any form of double counting of materials;
- book expenses or costs to the wrong project; or
- submit any other record designed to mislead Mace or its clients.

## 8. ANTI-FACILITATION OF TAX EVASION

Mace has a zero-tolerance approach to tax evasion and the facilitation of tax evasion by its employees and associated persons. Mace expects its suppliers to fully comply with their tax obligations and to put in place reasonable prevention measures to prevent the facilitation of tax evasion by the supplier's employees or associated persons.

## 9. FAIR COMPETITION

Mace supports open and fair competition and is committed to complying with competition law (referred to as anti-trust law in some countries) wherever it does business. Competition law prohibits agreements, decisions or practices between companies (however informal) which have a harmful effect on competition, and any harmful or exclusionary conduct by a company which has market power. Mace expects its suppliers to comply with competition laws and to have in place procedures to prevent breaches of competition law. Specifically, suppliers must not:

- share with anyone at Mace any information that you receive from or about Mace's competitors or their bids, prices, any element of price (including discounts, premiums or credit terms), contract terms or other commercially sensitive information;

- share with anyone at Mace any information concerning the bids you are making to any of Mace's competitors;
- share with any other person, information that you learn about Mace's bids, prices, any element of price (including discounts, premiums or credit terms), contract terms or other commercially sensitive information;
- participate in bid rigging by way of bid suppression, complementary or cover bidding, bid rotation, or other mechanisms that limit fair competition in tender situations, when making bids to Mace or Mace's competitors; and
- participate in any other form of cartel practices with competitors, such as dividing or allocating markets/customers or price-fixing.

## 10. **CONFIDENTIALITY**

Documents or other information about Mace's business, clients or business partners is confidential and should be held securely and in accordance with contractual obligations. If you become aware of any such information whilst conducting business with Mace, it should not be disclosed to anyone outside of the supplier's organisation. Mace expects its suppliers to maintain any confidential information as confidential even after your contract with Mace has ended. Mace must be notified within 24 hours of any breach of confidentiality or data security.

## 11. **DATA PROTECTION**

Mace is committed to protecting the privacy and data protection rights of the subjects. Mace does not tolerate personal data being misused or mishandled. Mace has in place a Data Protection Policy and operational and technical standards. Mace expects the same of its suppliers. Specifically, suppliers must:

- comply with all applicable data protection laws;
- process personal information in a fair, lawful and transparent manner;
- only collect the personal information required to fulfil the service you are providing and to not further process this information in a manner incompatible with this service;
- implement organisational and technical measures to ensure the integrity and confidentiality of personal information;
- co-operate with and assist Mace with any data protection impact assessments or compliance matters which relate to the processing activities being carried out by you on behalf of Mace.

## 12. **EQUALITY, DIVERSITY, BULLYING AND HARASSMENT**

Mace promotes an environment in which all colleagues enjoy equal opportunities and treatment, free from any form of discrimination, victimisation or harassment. Mace will not tolerate bullying, harassment or any form of discrimination based on age, disability, sex, gender identity, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or marital status/civil partnership.

Mace expects its suppliers to promote the same kind of environment within their organisation and to commit to creating an inclusive working environment where everyone is respected and valued whatever their role, level, qualification, skills or competency.

### 13. **MODERN SLAVERY AND HUMAN RIGHTS**

Mace conducts its business in accordance with the principles of, and with respect for, the Universal Declaration of Human Rights. Slavery and human trafficking are crimes and a violation of human rights. Mace has a zero-tolerance approach to slavery and human trafficking in its business and supply chain. Mace is committed to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking are not taking place anywhere in its business or in any of its supply chains. Mace expects the same of its suppliers and their supply chains.

### 14. **HEALTHY, SAFETY, WELLBEING AND ENVIRONMENT**

Mace aims to be world leading in its health and safety management and is committed to a clean working environment. Mace expects its suppliers to continually strive to reduce risks to your people and those impacted by your operations by building a culture where safety first enables employees to go home safe and well. Mace expects suppliers to comply with all health and safety and environmental laws, policies, procedures and rules applicable to you and your work activities.

### 15. **SANCTIONS AND EXPORT CONTROLS**

Mace complies with relevant financial sanctions and export controls. Mace expects its suppliers to have in place processes to comply with financial sanctions and export controls. Specifically suppliers must:

- inform Mace if any equipment or technology being supplied to Mace is subject to any export controls which may necessitate Mace obtaining a licence to use or transfer the equipment or technology;
- inform Mace if the Supplier, any director or shareholder, subsidiary or parent company is listed on any UK, EU or other sanctions lists;
- not conduct business with any person or entity that is the target of sanctions or a trade embargo.

### 16. **COMPLIANCE AND ETHICS**

We will seek to work with suppliers which take legal compliance and ethical business seriously. We will support suppliers who are working to put in place processes to meet the expectations of this Code as long as you are transparent with us. If we discover that the Code has been deliberately breached or you do not co-operate with us, we will stop doing business with you.