

Supplier Code of Conduct

Effective Date: July 7th, 2025



1. Introduction

This Supplier Code of Conduct outlines the principles and standards expected of all suppliers, subcontractors, and business partners who provide goods or services to Sicut Enterprises Ltd (“Sicut”).

Sicut is committed to ethical conduct, legal compliance, sustainability, and social responsibility. We expect our suppliers to operate in a manner that is consistent with these values.

2. Compliance with Laws and Regulations

Suppliers must operate in full compliance with all applicable local, national, and international laws and regulations, including but not limited to:

- The UK Bribery Act 2010
- The Modern Slavery Act 2015
- The Equality Act 2010
- The Public Contracts Regulations 2015
- UK GDPR and data protection laws

3. Labour and Human Rights

Suppliers shall uphold the human rights of workers and treat them with dignity and respect. This includes:

- Prohibiting forced, bonded, or indentured labour, and child labour
- Providing fair wages, working hours, and safe working conditions
- Respecting freedom of association and the right to collective bargaining
- Prohibiting any discrimination or harassment

4. Business Integrity and Ethics

Suppliers are expected to uphold the highest standards of integrity:

- Zero tolerance for bribery, corruption, extortion, or embezzlement
- Avoid conflicts of interest
- No engagement in anti-competitive or unfair trade practices
- Accurate and honest business records and disclosures

5. Environment and Sustainability

Suppliers must actively minimise environmental impacts, through:

- Complying with all applicable environmental laws

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- Reducing waste, emissions, and energy consumption
- Promoting sustainable sourcing and production
- Encouraging the use of recyclable materials and packaging
- Adopting circular economy principles

6. Diversity and Inclusion

Suppliers should foster an inclusive workplace that respects diversity:

- Provide equal opportunities regardless of race, gender, age, disability, religion, or background
- Promote diversity in hiring and leadership practices

7. Health and Safety

Suppliers must provide a safe and healthy working environment:

- Identify and mitigate health and safety risks
- Provide necessary protective equipment and training
- Ensure hygienic facilities and emergency preparedness

8. Payment and Subcontracting

Suppliers must:

- Pay subcontractors and suppliers promptly and fairly
- Encourage fair terms across the entire supply chain

9. Confidentiality and Data Protection

Suppliers must:

- Protect confidential information and intellectual property
- Adhere to data protection regulations, including UK GDPR
- Report breaches promptly and cooperate with incident investigations

10. Monitoring, Audits, and Reporting

Sicut reserves the right to:

- Conduct audits and assessments
- Require root cause analysis to be undertaken
- Require corrective action plans
- Terminate agreements in the event of serious breaches

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11. Certification and Acknowledgement

- Compliance with the Supplier Code of Conduct is a fundamental requirement of working with Sicut. Adherence to this Code of Conduct is an obligation for all suppliers to Sicut with equal weight to all other contract terms that otherwise apply to all supply agreements between suppliers and Sicut.

12. Contact and Whistleblowing

Suppliers are encouraged to report misconduct or concerns via:

info@sicut.com – “Confidential - Supplier Conduct” in the subject

13. Review and Updates

This Code is reviewed periodically and may be updated. Suppliers are expected to remain informed and compliant with the latest version, included in contract terms and conditions.

Sicut Enterprises Ltd

WILLIAM MAINWARING CEO

Date: 7th July 2025