



**PZ Cussons plc**

**Supplier Code of Conduct**

**April 2022**

## 1. Purpose

This Supplier Code of Conduct (the “Supplier Code”) sets out the requirements and expectations which PZ Cussons plc and its affiliates and subsidiaries (the “Group”, “we” or “our”) has of the ethical conduct, values and principles which our suppliers and business partners will adhere to in all aspects of their business. This Supplier Code incorporates and must be read in conjunction with our Group Code of Ethical Conduct and related policies which can be found at [Code-of-Ethical-Conduct-V12-English.pdf \(pzcussons.com\)](#)

- 1.1 PZ Cussons is strongly committed to trading ethically and to ensure good working conditions and environmental practices in its supply chain. Through our supplier assessment and engagement practices, we aim to go beyond compliance, driving positive change in working conditions and environmental performance. We expect our suppliers to conduct their business with transparency and integrity and to maintain high standards of ethical conduct and environmental stewardship. Our suppliers must operate in a manner that is consistent with the Group’s approach to ethical conduct and are encouraged to strive towards our sustainability principles as set out in our sustainability charter or statements in effect from time to time.
- 1.2 Any violations of this Supplier Code are a serious matter for the Group and may result either in a requirement for corrective actions or a re-evaluation of our continued dealings with a particular supplier. Where appropriate and consistent with applicable laws and contractual terms, violations of this Supplier Code may result in termination of a supplier’s relationship with the Group, legal claims or referrals to regulatory authorities.

## 2. Governance and legal compliance

- 2.1 Any corrupt engagement with third-parties, government officials, customers and suppliers is strictly prohibited. Group suppliers are responsible for:
  - (a) ensuring they maintain strict prohibitions on offering or accepting all forms of bribery (including facilitation payments), corruption, kick-backs, extortion, embezzlement, pilferage or fraud;
  - (b) ensuring their operations comply with all applicable laws and regulations, including the UK Bribery Act 2010, the Modern Slavery Act and all other applicable national and international anti-corruption conventions, regulations and legislation;
  - (c) maintaining adequate procedures and measures to prevent bribery in any business dealings conducted for or on behalf of the Group and ensuring adequate reporting procedures exist for reporting concerns in accordance with applicable laws; and
  - (d) ensuring personal activities and interests, and those of the Group supplier’s employees and sub-contractors, do not conflict with their responsibilities to the Group or appear to present conflicts of interest that may cast doubt on the fairness and integrity of our business processes.
- 2.2 The Group does not permit facilitation or “grease” payments to be paid either directly or indirectly by those who work for us or on our behalf. If a Group supplier is asked to make such a payment on behalf of the Group, then it must politely refuse and report it to the General Counsel, the Head of Ethics & Compliance or the Group’s confidential whistleblowing reporting system, Ethicspoint by Navex Global as soon as practicable.

- 2.3 Inappropriate, frequent or lavish gifts or hospitality can result in an actual or perceived conflict of interest or the development of an obligation on the part of the recipient that could be considered bribery. Giving or receiving excessive or inappropriate gifts and hospitality is prohibited and bribes or kick-backs must not be accepted or paid. Any gifts or hospitality given or received in the course of conducting business for or on behalf of the Group must be recorded and details provided upon request by the Group.

### **3. Labour and human rights**

- 3.1 Group suppliers must treat their employees with dignity and respect and support an environment where work is voluntary, employment is freely chosen. Employees must be free to leave employment after service of reasonable notice and Group suppliers will not require their employees to deposit money or identity papers as a condition of continued employment. Suppliers will not use misleading or fraudulent recruitment practices. Suppliers and other external business partners, including recruitment agencies, must verify the legal employment eligibility before selecting employees to ensure no usage of slavery, or prison, bonded, child, or forced labour of any kind.
- 3.2 Group suppliers will, at a minimum, comply with local laws regarding wage, freedom of association and working hour issues, as well as ensuring all legally mandated benefits are being provided, including those related to maternity, family and childcare benefits and protections.
- 3.3 The employees of all Group suppliers should be protected against any form of harassment (physical, sexual, psychological or verbal) or other form of intimidation. No employee shall be discriminated against on any grounds including caste, nationality, ethnicity, religion, age, disability, gender, sexual orientation or marital status.
- 3.4 Group suppliers must implement appropriate confidentiality measures to protect the privacy of customers, clients and employees and safeguard customer, client and employee information and the transfer of technology, services and know-how in a manner that protects all applicable intellectual property and data protection rights.

### **4. Health and safety, including emergency preparedness and business resilience**

- 4.1 Group suppliers must maintain adequate facilities to ensure the safety and well-being of their workforce, including (without limitation) access to potable water and suitable toilet facilities. Group suppliers should endeavour to minimize the incidence of work-related injury and illness, and provide employees a safe and healthy work environment to prevent any accidents and risks of injury arising during the course of work, in compliance with all applicable laws and regulations. Group suppliers should ensure that a senior management representative has overall accountability for maintaining health and safety standards and that workplace accidents and injuries are appropriately recorded and, to the extent permitted by law, shared with the Group on request.
- 4.2 Group suppliers should identify and assess emergency situations in the workplace and minimize their impact through prevention.

## **5. Sustainability**

- 5.1 The Group encourages suppliers to strive toward the highest standards of environmental stewardship and to, where appropriate, adopt the environmental positions taken by the Group in our sustainability charter and policies in effect from time to time. The Group, at a minimum, expects suppliers to:
- (a) comply at all times with all applicable local and international environmental laws and regulations; and
  - (b) hold all local and international permits, licences, consents and authorisations required to operate their business;
- 5.2 PZ Cussons strongly encourages suppliers to adopt proactive measures in their operations to reduce their impact on the environment, including on biodiversity and natural ecosystems. Examples of such measures include, but are not limited to, implementing practices to reduce waste, reduce energy and water consumption, reduce the impact in packaging and in the transportation of finished goods and the treatment of wastewater.

## **6. Animal Testing**

- 6.1 The Group is passionately against animal testing. We do not test finished products or ingredients on animals, and do not permit our suppliers or any third parties to conduct animal testing on our behalf. Our suppliers must accept those terms in order to work with us. We will not sell our products, directly or indirectly, in any manner which would require them to be tested on animals prior to reaching our consumers.

## **7. Information and reporting**

- 7.1 Group suppliers must:
- (a) maintain accurate financial books and business records, including invoicing, in accordance with all applicable legal and regulatory requirements and accepted accounting practices;
  - (b) not use confidential information regarding the Group to either engage in or support insider trading;
  - (c) report on environmental, social and governance performance to meet applicable regulatory and contractual requirements; and
  - (d) ensure the intellectual property rights of the Group and other third parties (patents, trademarks, copyright, and confidential information) are respected.

## **8. Reporting responsibilities**

- 8.1 Group suppliers have a responsibility to prevent actions that may damage the Group's reputation and business. Group suppliers should disclose any activity that may have the appearance of being unethical or an actual or suspected breach of this Supplier Code.

8.2 Group suppliers are expected to assist the Group during any investigation or oversight process it reasonably undertakes. The Group strictly prohibits, and expects its suppliers to strictly prohibit, retaliation against any person for raising concerns or making a report in good faith or cooperating in any investigation or oversight process.

## 9. Declaration

I hereby acknowledge that I have received, read and understood the Supplier Code and by signing below I am agreeing to the terms and conditions mentioned above.

Company Name:

Signature:

Name: \_\_\_\_\_

Date: \_\_\_\_\_