



Sustainable Supplier Policy

Wherever possible, ELG wishes to adopt sustainable purchasing practices and will favour working with business which have their own sustainability policies and measures in place as well as transparency and accountability measures.

Ethical and Sustainable Supply Chain Statement

Across our operations, we see an opportunity to lead suppliers to better ethical, social and environmental performance. There are increasing expectations to be transparent, expose breaches and encourage ethical conduct where we have influence within our supply chains. We wish to clarify our approach to Ethical and Sustainable Procurement.

Our principles and policies are based on the United Nations Global Compact, which aligns our practices with the ten principles in the areas of human rights, labour standards, environment and anti-corruption:

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. Make sure that they are not complicit in human rights abuses.
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. The elimination of all forms of forced and compulsory labour;
5. The effective abolition of child labour; and
6. The elimination of discrimination in respect of employment and occupation.
7. Businesses should support a precautionary approach to environmental challenges;
8. Undertake initiatives to promote greater environmental responsibility; and
9. Encourage the development and diffusion of environmentally friendly technologies.
10. Businesses should work against corruption in all its forms, including extortion and bribery.

Our minimum and preferred requirements for Suppliers and Contractors are set out in our Supply Chain Code of Conduct. We reserve the right to terminate our trading agreement where a supplier is unable to demonstrate a commitment to this policy. Our commitments require that:

- ▶ Laws are respected
- ▶ Employment is freely chosen
- ▶ Child labor shall not be used
- ▶ Illegal labor shall not be used
- ▶ Appropriate wages are paid
- ▶ Working hours are not excessive
- ▶ Freedom of association and the right to collective bargaining are respected
- ▶ Working conditions are safe and hygienic
- ▶ No discrimination is practiced
- ▶ No harsh/inhumane treatment allowed
- ▶ Businesses operate ethically
- ▶ No unauthorised sub-contracting allowed
- ▶ Due regard is given to environmental impacts

By submitting your quote, you are agreeing to the above commitments.

Supply Chain Code of Conduct

1. Objective

The Supply Chain Code of Conduct sets out the minimum ethical expectations of Suppliers and Contractors who work with Eden Leisure.

2. Scope and Applicability

ELG maintains the highest standards of corporate governance and ethics, and conducts business in an open, honest and ethical manner as per its Code of Conduct.

ELG has embarked on a journey of continuous improvement with the aim to be recognised as an industry leader in corporate responsibility and therefore actively strives to implement ethical, socially responsible supply chain practices and anti-bribery, corruption and modern slavery practices.

It is expected that preferred Suppliers and Contractors who agree to work with ELG will meet or exceed the requirements set out in this Code. ELG reserves the right to audit compliance with this Code and cancel business with Suppliers and Contractors who do not meet the minimum expectations set out herein. ELG may conduct due diligence on Suppliers and Contractors. This Code shall be applied to all Contractors and Suppliers, and their subcontractors and sub-suppliers.

A breach or potential breach of the Code must be reported.

3. Minimum Expectations

3.1 Legal Obligations

- ▶ Comply with all applicable local and national laws and regulations;
- ▶ Disclose to ELG anything that could impact the Supplier / Contractor's ability to provide goods or services as contracted by ELG.

3.2 Management Systems

- ▶ Implement adequate management systems (policies, plans, accounting and reporting mechanisms and performance measures);
- ▶ Demonstrate senior management commitment to effective and transparent culture of compliance
- ▶ Report social, ethical, safety and environmental performance

3.3 Anti-Bribery and Corruption

- ▶ Implement adequate policies and procedures for combatting bribery and corruption;
- ▶ Educate personnel and act in the best interests to avoid conflicts of interest. A conflict of interest is any situation in which the Supplier / Contractor's employees, relatives or acquaintances may have a private or personal interest, directly or indirectly, which (potentially) influences or appears to influence impartiality as providing goods or services to ELG, or impacting ELG's business in any manner.

3.4 Modern Slavery Prevention

- ▶ Implement adequate policies and procedures relating to combatting modern slavery;
- ▶ Take action to address the modern slavery risks identified.

3.5 Labor / Workplace Management

- ▶ Comply with all national laws and regulations with regard to employment practices and benefits;
- ▶ Implement policies and procedures that meet or exceed the Building Responsibly worker welfare principles <https://www.building-responsibly.org/worker-welfare-principles>

3.6 Health and Safety

- ▶ Comply with all relevant local and national health and safety laws and regulations;
- ▶ Publish a written health and safety policy and relevant standards;
- ▶ Maintain a documented system to identify risks and reduce work-related injury and illness;
- ▶ Produce and test written emergency response plans designed to minimise harm to employees, local communities and local environments in the event of any site disasters.

3.7 Environmental Sustainability

- ▶ Comply with relevant local environmental laws and regulations, including permits and reporting;
- ▶ Take responsibility for Supplier/Contractor's materials, products, processes, services throughout
- ▶ The lifecycle, including carbon reduction, product stewardship, extended producer responsibility;
- ▶ Publish a written environmental policy;
- ▶ Create a written environmental management plan to identify risks from Supplier / Contractor's activities and minimise impacts on the environment;

3.8 Quality

- ▶ Apply industry processes and improvement in product quality and services around quality, control, supplier selection, continuous measurement, learning and customer feedback;
- ▶ Maintain quality control procedures and standards which are understood and adopted through Supplier / Contractor's organization and the supply chain;
- ▶ Maintain ISO9001:2015 certification (Quality management) or other specs as required in the contract scope.

3.9 Sub-suppliers and Sub-contractors

- ▶ Implement a process to select, monitor and manage sub-suppliers and sub-contractors, including technical and commercial performance, effective and accountable quality practices, exclusion of counterfeit materials;
- ▶ Adopt similar minimum standards to these in dealing with sub-suppliers and sub-contractors; Conduct due diligence across your supply chain to ensure the intent of this policy is met, including providing for timely payment, and prevention of modern slavery, bribery and corruption.

3.10 Community Engagement

ELG believes every company has a responsibility to the local communities on which they have an impact and from which they profit. Our approach is to conduct business in a way that builds social capital and achieves a positive impact. This includes:

- ▶ Identifying and assessing risks to the communities in which Supplier / Contractor operate their businesses within and adopting measures to minimise such risks;
- ▶ Engagement with community stakeholders and long-term strategic involvement in community partnerships to address key social issues

3.11 Personal Data Protection

- ▶ Comply with all relevant GDPR laws relating to the privacy and security of personal data and have a process to ensure that Supplier / Contractor's own sub-suppliers, service providers, and subcontractors, comply with all such laws.

3.12 Trade and Export Control

- ▶ Comply with applicable laws and regulations relating to export, trade sanctions, non-proliferation and arms control;
- ▶ Implement adequate policies and reliable systems in place to prevent the use of illegally or unethically sourced materials, and policies and systems to prevent improper procurement of conflict minerals;
- ▶ Take action to prevent counterfeit, fraudulent and suspect items from entering the supply chain.

3.13 Media

- ▶ Ensure any broad communication regarding Supplier / Contractor's business relationship with ELG, including marketing materials, press releases, social media posts or media interviews, are formally approved prior to publication.

ELG's principles are based on the United Nations Global Compact, which aligns our practices with the ten universally accepted principles in the areas of human rights, labor standards, environment and anti-corruption.