

Introduction

We believe in growing our business responsibly and sustainably. Our Supplier Code of Conduct defines the non-negotiable for suppliers. It defines our values, making clear what is expected from our suppliers.

We are committed to the highest standards of business conduct and practices to maintain the trust and respect of our customers, shareholders, other stakeholders and the wider community. We base our supplier relationships on lawful, fair, and ethical business conduct and practices. We expect our suppliers to adhere to applicable legal and regulatory requirements in all their dealings with us.

Our Supplier Code of Conduct has been developed to ensure that our suppliers understand our commitment, expectations and requirement of acceptable business conduct and practices.

Please ensure that you review our Supplier Code of Conduct with your employees, suppliers, agents and representatives.

Our Supplier Code of Conduct applies to all suppliers who provide product and or/services to McAvoy, our subsidiaries, joint ventures and/or affiliates. We require our suppliers and their employees to commit to our Supplier Code of Conduct without any exceptions, as a condition of doing business with us.

Our suppliers must:

- Undergo prequalification and due diligence
- Adhere to our Supplier Code of Contract
- Participate in safety inductions and quality checks

Legislation

Our suppliers must comply with the laws and regulations of the countries and jurisdictions in which we operate.

The standards of our Supplier Code of Conduct are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a supplier and McAvoy.

Anti-Bribery and Corruption

Our suppliers must refer to and comply with McAvoy's Anti Bribery and Corruption Policy which is available at www.mcavoygroup.com.

Conflicts of Interest

Suppliers working with us, directly or indirectly, are expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest while engaged in business with McAvoy.

Our suppliers must not enter into any transactions with our employees which could potentially create a conflict of interest. Suppliers are required to immediately report any situations of potential or apparent conflicts between their interests and our interests.

Protecting McAvoy Assets, Resources and Data

Confidential Information and Data Protection

The proper management of confidential information is critical to the success of both us and our suppliers. Confidential information includes all non-public information that might be useful to competitors or harmful to us or our customers if disclosed. While performing work for us, suppliers may have access to proprietary and/or confidential information. Suppliers are required to maintain the confidentiality of such information entrusted to it and to protect all our information, electronic data, intellectual property, design and technologies with appropriate safeguards using the same care that the supplier exercises with its own proprietary and confidential information. Suppliers must not disclose such information to any other person without the advance written consent of us, unless such disclosure is legally mandated. Any transfer of confidential information must be executed in a way that secures and protects the intellectual property of McAvoy, its subsidiaries, joint ventures and/or affiliates.

Property Rights of McAvoy and its Suppliers

Our suppliers may receive our confidential information only as authorised by a non-disclosure agreement and must comply with their obligations to not use the information except as permitted by the agreement, and to protect the information from misuse or unauthorised disclosure.

Our suppliers must respect our intellectual property and must not use it or our affiliates' or subsidiaries' trademark, images, patented technology or other materials, including materials of third parties, unless explicitly authorised by us in writing. If a supplier becomes aware of an actual or possible unauthorised disclosure of our information, it must be reported immediately to McAvoy Chief Executive Officer or Chief Finance Officer.

Our suppliers must conduct business in a manner that is compliant with the requirements of all applicable data protection and privacy laws and regulations.

State and Trade Secrets

Our suppliers must not, directly or indirectly, wrongfully solicit, obtain or use on our behalf, or wrongfully disclose to us, any information of any other person, association, firm, corporation, government or other entity, which is secret, confidential, proprietary, classified for national security or national interest purposes, or government procurement sensitive (e.g., source selection information) or any other information which may offer us an illegal or unfair advantage.

Accurate Accounting Records

Our suppliers must maintain accurate financial books and business records in accordance with all applicable laws, regulations, and accepted accounting practices. Suppliers must accurately document all transactions related to their transactions with us.

Antitrust and Competition Laws

We adhere strictly to the requirements of competition or anti-trust laws and regulations in every jurisdiction in which we do business, and we require our suppliers to always comply with such laws and regulations.

Compliance with Export Laws

We comply with, and expect our suppliers to comply with, all applicable laws and regulations concerning embargoes and sanctions. We strictly prohibit our suppliers from directly or indirectly, conducting transactions with blacklisted individuals, entities, or countries. In addition, suppliers must not, directly or indirectly, provide to us any material or service from a country, or by a person or entity that is subject to embargoes and/or sanctions restricting transactions with specific foreign entities, persons or countries.

To ensure compliance with applicable laws and regulations concerning embargoes and sanctions, suppliers must implement due diligence compliance practices to screen their employees, customers, suppliers, vendors, agents and other business associates, including all parties in each transaction such as banks, insurance companies etc.

Contractual Compliance

Our suppliers must not breach or violate any of its existing agreements, including without limitation employment agreements, consulting agreements, non-disclosure agreements and technology licenses, if such breach could give rise to a claim at law against us.

Human Rights & Modern Slavery

We are committed to a working environment that promotes diversity, inclusion, fairness, respect and life-long learning. We believe in providing a workplace where there is mutual trust, respect for human rights and no discrimination.

We will not use any form of forced, compulsory, trafficked or child labour. We respect the dignity of the individual and the right of employees to freedom of association. We expect our suppliers to conduct business activities in a manner which is compliant with and promotes fundamental human rights.

Our suppliers must always adhere to the minimum age limit for work, as defined by national laws and/or regulations, and comply with relevant International Labour Organisation (ILO) standards. Under no circumstances will a supplier permit young workers to perform work that exposes them to mental, physical, social or moral danger or harm, or that improperly interferes with their educational development.

We are committed to understanding all potential modern slavery risks related to our business and to putting in place steps aimed at ensuring that there is no slavery or human trafficking in our business or supply chains.

Our suppliers must not, under any circumstances, participate in human trafficking; forced, involuntary, or slave labour; or purchase materials or services from companies using forced, involuntary, or slave labour.

Our suppliers must ensure that working hours, wages and benefits will be consistent with legal and industry standards, including those regulations pertaining to minimum wages, overtime, mandatory benefits and other elements of compensation.

Whilst we have a degree of visibility through our onboarding checks as well as during the course of our working relationships with our suppliers. We cannot detect every supply agreement and all of our suppliers working practices.

Health, Safety & Environment and Quality Assurance

Health and Safety

We expect our suppliers to provide their workers with a safe and healthy work environment in accordance with all applicable health and safety laws, regulations and standards. Our suppliers must comply with our Health and Safety requirements and policy, as may be updated from time to time, and must report any health and safety incidents as per the terms of our policy. Our suppliers must take proactive measures that support accident prevention and minimise health risk exposure.

We take supplier breaches of health and safety laws, regulations and standards seriously and may terminate a supplier relationship where such laws, regulations and standards have not been complied with.

Environment

Our drive is to be carbon zero by 2050, and we therefore expect our suppliers to complete our accreditation process and conduct their operations in a way which helps us to achieve this and to minimise their impact on natural resources and protect the environment, customers, and employees. Suppliers must ensure their operations comply with all environmental laws and regulations.

McAvoy will require all suppliers to submit an annual report to Head of SHE specifying Scope 1 process emissions (Diesel and Natural Gas) and all Scope 2 emissions (electricity) associated with the production of goods and services supplied to McAvoy.

Suppliers will be expected to take all reasonable steps to minimise energy use and carbon emissions. They should ensure responsible handling of waste by applying structured waste management approaches such as segregating waste, recycling materials and minimise waste, including packaging materials.

McAvoy will continue to work towards a circular economy and will require suppliers to facilitate them by providing information on the environmental impact of their products such as Environmental Product Data sheets.

Suppliers of wood products should provide evidence that all products & packaging have been sustainably and legally sourced.

Quality Assurance

Materials and services must meet the specifications outlined in our contracts and be subject to our Quality Assurance standards.

Monitoring & Auditing

McAvoy reserves the right to audit supplier operations, request documentation and conduct site visits to ensure compliance with this Policy.

News Media Enquiries

Suppliers must not represent themselves to the media as speaking on our behalf, unless expressly authorised in writing to do so. Suppliers must immediately refer any media inquiries to our Chief Executive Officer or Chief Finance Officer.

Whistleblowing

We encourage a free and open culture, and we recognise the importance of effective and honest communication which is essential to the success of our business.

Our suppliers will be able to make a disclosure or raise issues with a Senior Manager or HR in confidence. Examples of this include:

- Bribery, fraud or another criminal offence has been committed, is being committed or is likely to be committed.
- The health and safety of any individual has been, is being or is likely to be endangered.
- The environment has been, is likely to be damaged.
- If you commit a criminal offence whilst making a disclosure you will not be protected from the consequences of making that disclosure

Any investigations resulting from a disclosure will be handled with the utmost discretion and we will do everything in our power to ensure that the working environment is not prejudiced by any disclosure.

We will not retaliate against whistleblowers who report a matter of serious concern.

Approval Level: **Board of Directors**



Ron Clarke
Chief Executive Officer