

SUPPLIER CODE OF CONDUCT



Introduction

This Code of Conduct sets out the values, behaviours, and conduct that suppliers working with Red Armour are expected to demonstrate. This code of conduct applies to all suppliers providing services to Red Armour. We identify Suppliers as referred to throughout the Code of Conduct, to include any organisation providing products, services or personnel to Red Armour or any of our clients either directly or indirectly.

The Supplier Code of Conduct is divided into the following sections:

Section 1: Compliance to Legislation

- Compliance with applicable laws
- Anti-Discrimination
- Prevention of Modern-Day Slavery

Section 2: Ethics and standards of conduct

- Ethical Conduct
- Diversity & Inclusion
- Global Citizenship
- Confidentiality
- Policies
- Anti-Bribery & Corruption
- Data Privacy
- Information Security
- Risk Management

Section 3: Misconduct and reporting concerns

- Conflicts of Interest
- Raising Concerns

Section 4: Assurance

- Supplier Assurance
- Conclusion

The Red Armour Supplier Code of Conduct is intended to supplement but not replace any contractual agreement in place between Red Armour and suppliers. Red Armour expect all suppliers to comply with all terms and conditions set out in any contractual agreement.

1 Compliance to Legislation

Compliance with applicable laws Red Armour operate on a global basis. It is critically important that we understand all applicable country-specific legislative requirements. We have policies and procedures in place to support our activity in every country in which we operate. We have a commitment to identify legislative changes, and to ensure ongoing compliance.

Red Armour expect that suppliers will also strive to do the same and will comply with all applicable laws, rules and regulations in the country or countries they operate in. This includes but is not limited to; Employment Laws, Health & Safety Laws, Anti-Bribery and Corruption Laws and Data Protection Laws.

1.1 Anti-Discrimination

At Red Armour, it is our policy to treat everyone equally, regardless of gender, race, disability, sexual orientation, age, nationality, religion or belief, marital status, ethnic origin, political convictions, family responsibilities or gender reassignment.

We take a zero-tolerance approach to any form of discrimination, harassment, or victimisation and expect our suppliers to do the same and to raise any concerns of non-compliance, in connection with the services provided to Red Armour or its clients, through appropriate channels.

1.2 Prevention of Modern-Day Slavery

Red Armour take a zero-tolerance approach to modern day slavery; a key legislative requirement for UK and EU based organisations now, and increasingly so globally. We support this through due diligence measures and reviewed and updated regularly. We expect our suppliers to support the zero-tolerance approach and consider what due diligence measures are appropriate for their organisation and ensure these are implemented.

2 Ethics and Standards of Conduct

2.1 Ethical Conduct

Red Armour expect all personnel to act with honesty and integrity. Acting ethically and ensuring fair treatment is of upmost importance to us. We expect our suppliers and all personnel engaged by our suppliers to consider this and do the same.

2.2 Diversity & Inclusion

Diversity and inclusion is integral to Red Armour and we believe that a wide range of experiences creates a more dynamic, inclusive culture and helps us serve our clients better. As such, we aim to be an Equal Opportunities Employer and are committed to the principle of providing equality of opportunity in every aspect of work and the way we do business.

Red Armour expect suppliers to consider this and act in a similar way.

2.3 Global Citizenship

Red Armour are committed to global corporate citizenship and this is central to our culture. We're accountable for our environment and our impact in the communities in which we operate; therefore, we act responsibly in all our relationships with clients, employees, suppliers and communities around the world.

Being responsible is central to what we do; from mentoring underrepresented groups, to recycling and reducing waste, to raising funds for charities we support, Red Armour is committed to bringing the power of our people to the challenges impacting the environments we work in.

Red Armour expect suppliers to consider this and act in a similar way.

2.4 Confidentiality

Red Armour will from time to time entrust suppliers with information of a sensitive or confidential nature. Confidential information takes many forms and we expect suppliers to apply the below principles:

- Respect the confidential nature of the information,
- Protect Red Armour, our people and our Clients, and;
- Act in accordance with all contractual agreements you have in place with us

Any misuse or inappropriate sharing of confidential information will be taken very seriously and could result in termination of your contract or agreement to supply services to Red Armour.

2.5 Policies

Red Armour guidelines and rules, set out in our policies, are intended to ensure we operate in a fair and ethical way and in compliance with all local laws and regulations. Our policies include but are not limited to the following:

- Anti-Bribery
- Gifts & Hospitality
- Anti-Slavery & Human Trafficking
- Data Protection, Retention, and Classification
- Procurement & Supply Management
- Information Security
- Expenses Policy
- Global Travel Policy

Red Armour expect suppliers to have policies and procedures in place that are appropriate for the business they are operating and relevant to the services being provided to Red Armour and/or our Clients.

2.6 Anti-Bribery & Corruption

It is policy and standard practice at Red Armour to maintain the highest level of ethical standards in the conduct of our business affairs and to this end we have a zero tolerance towards any act of bribery or corruption and we have robust controls in place to prevent bribery.

We will uphold all laws relevant to thwarting bribery and corruption in all jurisdictions in which we operate and expect all suppliers to do the same.

Red Armour deem it unacceptable for any personnel working for or on behalf of the company to engage with any act of bribery (giving or receiving) and we expect our suppliers to consider this and act in a similar way. We expect that suppliers should, under no circumstances, seek to influence any Red Armour personnel with any act of bribery.

Red Armour expect all suppliers to prevent, detect and report any cases of bribery and/or corruption as appropriate.

2.7 Data Privacy

Whether you are processing data on behalf of Red Armour or on behalf of one or more of our clients, or you are operating independently of our instruction as a data controller, Red Armour expect all suppliers to comply with all applicable privacy legislation appropriate to your business.

Red Armour expects all suppliers to commit to deliver a compliant service, to working alongside Red Armour and/or our clients to ensure that the interests of the people whose data you are entrusted with are protected and that the principles of the General Data Protection Regulations are met in the delivery of your product or service.

We expect that:

- You collect the minimum data needed
- You keep data accurate and up to date
- You only use data for what it was volunteered
- You keep data for no longer than absolutely necessary, removing via secure disposal
- You are fair, lawful, and transparent with how you process data, whoever it belongs to
- You are accountable for privacy, and able to demonstrate a compliant approach
- You maintain Integrity and Confidentiality of personal data

In the event of a data breach being identified in connection with the services provided to Red Armour and/or its clients, Red Armour expect all suppliers to inform us as soon as is practicably possible.

2.8 Information Security

It is policy and standard practice at Red Armour that information assets are protected from all types of threats, whether internal or external, deliberate or accidental, such that:

- confidentiality of information shall be maintained
- integrity of information shall be relied upon
- information shall be available when the business needs it
- all statutory, regulatory and contractual obligations shall be met

Red Armour expects its suppliers, partners and sub-contractors that store, transmit, use, process, interface or destroy any confidential data on Red Armour behalf to adopt an information security framework or management system for identifying information security risks and ensuring appropriate level of protection. This shall be achieved by implementing a set of policies, procedures and/or controls (appropriate for the services provided) to address technical and organisational security and provide adequate logging and monitoring capabilities as well as appropriate means for identifying, reporting and managing any information security incidents. The effectiveness of the framework shall be routinely reviewed and assessed by senior management to ensure its on-going suitability and adherence with best industry standards.

2.9 Risk Management

Red Armour recognises that in order to maintain a successful business there are risks, however, risks should never be greater than the business can withstand.

Red Armour has a framework for managing risk effectively and consistently, with the appropriate degree of effort and is committed to promoting a risk awareness culture within Red Armour.

Red Armour expects its suppliers to establish processes and/or procedures for identifying risks including but not limited to the environmental, health & safety, data and information security, and ethical risks associated with their operations and have appropriate policies, procedures and/or controls to manage such risks and ensure regulatory compliance.

3 Misconduct & Reporting Concerns

3.1 Conflicts of Interest

All individuals working, in partnership with or providing products/ services to Red Armour are expected to operate with the best interests of Red Armour in mind at all times. Therefore, any potential conflicts of interest must be declared to Red Armour.

3.2 Raising Concerns

Red Armour expect all suppliers to raise any concerns, around behaviour or activity that has occurred, might have occurred, or has a strong possibility of occurring in the future that is contradictory to this Code of Conduct, that is relevant to or is in connection with services provides to Red Armour or its clients.

Suppliers can raise concerns to Red Armour by:

- Writing to 21 Boundary Lane, Welwyn Garden City, AL7 4EG
- Using our website: <http://redarmour.co.uk/home/contact-us/>

Once a Supplier has raised a concern, the details will be reviewed by a member of the Red Armour Compliance Function and referred to a Subject Matter Expert (SME) as appropriate. The SME will investigate the situation and ensure appropriate action is taken; Suppliers may be contacted during this investigation process and asked for further detail, if this happens, Red Armour expect suppliers to co-operate promptly with these requests. Suppliers will be notified when the concern has been fully investigated and closed down, and, if appropriate, the details of the resolution will be shared.

4 Assurance

4.1 Supplier Assurance

Red Armour have a central Compliance function that provides assurance in all the areas outlined in this Code of Conduct. Red Armour expect all suppliers to carry out their own assurance and audit activities in line with this Code of Conduct and as appropriate for their business.

4.2 In Conclusion

Red Armour expect all suppliers to conduct day to day practices in line with this Code of Conduct. Red Armour may conduct follow up compliance surveys and/or audits to confirm compliance with this Supplier Code of Conduct. Red Armour also expects our suppliers to hold their suppliers and subcontractors to the standards and practices covered in this Code of Conduct.