

Hastings Group Supplier Code of Conduct (SCoC)

1. Purpose

The purpose of the Supplier Code of Conduct (**SCoC**) is to set clear expectations to Hastings' suppliers in how to conduct their business in accordance with the values and standards that are important to Hastings. The SCoC forms a part of the Hastings Supplier Management Framework and requires all Suppliers throughout our supply chain to act lawfully, responsibly and respectfully. As a requirement for working in partnership with Hastings, it is expected that Suppliers demonstrate these values and uphold the highest standards of ethical, social, and environmental conduct in their business practices.

2. Principles

The SCoC is a set of guidelines and expectations that meet Hastings' values, and we expect Suppliers to adhere to these values when working with Hastings. The SCoC echoes the Hastings' [4Cs principles and culture](#) (Colleagues, Customer, Community and Company) and is designed to encourage Suppliers to adopt best practices in environmental and social governance, aligned to the UN Global Compact and its underlying conventions and declarations.

Hastings will work collaboratively with Suppliers to support their efforts to comply with these standards and continuously improve their performance in this field, with guidance and advice available from Hastings where needed.

Hastings will monitor suppliers' compliance with this SCoC and take appropriate action where necessary through scheduled review meetings. A clear expectation of continuous improvement is placed on the part of the Supplier, and Hastings will seek to enforce contractual obligations where relevant.

The Hastings SCoC sets out the minimum requirements expected of suppliers, subcontractors, agents, consultants, and other third parties who provide goods or services to us or on behalf of the Hastings Group.

Each of our suppliers must comply with all applicable legal and regulatory requirements including those related to environmental and social governance and provide evidence of their compliance upon request. Suppliers must also comply, or agree to work towards, the principles outlined in this SCoC, and to provide information as required through the use of the Hastings annual ESG due diligence questionnaire.

3. SCoC key principles guided by our 4Cs culture

Company focused principles

Ethical Conduct: Suppliers must conduct their operations in an ethical and transparent manner, including prohibiting bribery, corruption, modern slavery, human rights breaches and other unethical practices.

Business Continuity: Suppliers must have effective business continuity plans in place to ensure continuity of supply in the event of unforeseen circumstances.

Customer focused principles

Quality: Suppliers must provide high-quality products and services that meet or exceed our customer's expectations.

Responsiveness: Suppliers must be responsive to customer needs and concerns, including providing timely and accurate information and addressing any issues promptly.

Consumer Duty: Suppliers must apply rigorous controls when dealing with customers, especially those Customers in Vulnerable Circumstances (**CiVC**). Suppliers colleagues must undertake regular training in order to capture and notify CiVC and the Supplier must have the means to report that information back to Hastings. Suppliers must ensure that all customer facing colleagues are regularly trained to work with CiVC and that training must include how to identify someone in a vulnerable circumstance. When dealing with Hastings' customers, Suppliers and their personnel must adhere to high standards of services and promote a positive experience and good customer outcomes at all times.

Data Ethics: Suppliers are expected to follow an ethical approach in the collection, handling, use, storing and deletion of personal data. We require suppliers to implement ethical considerations into all data related projects and processing activities. We expect suppliers to be consistent with the key principles of fairness, transparency and accountability outlined in the [Information Commissioner's Office \(the ICO\) guide to the seven key principles of the UK General Data Protection regulations \(GDPR\)](#). Key points include:

- Ethical Data Use: Ensuring data is used in a manner that is both ethical and appropriate, considering not just what can be done with data, but what should be done.
- Responsible Innovation: Encouraging personnel to address ethical considerations within their projects and work activities.
- Customer and Colleague Protection: Ensuring that data use benefits Hastings' customers, Hastings' colleagues and supplier personnel.
- Regular Reviews: Ethics should be considered during the design phase of data projects or processes and regularly reviewed as they evolve over time.

Colleague focused principles

Health and Safety: Suppliers must ensure the health and safety of their personnel, contractors, and any other individuals involved in their operations.

Diversity and Inclusion: Suppliers must promote diversity and inclusion with their personnel and operations, including promoting equal opportunities and preventing discrimination.

Training and Development: Suppliers must provide training and development opportunities for their personnel to improve their skills and knowledge.

Community focused principles

Community Engagement: Suppliers should engage with the local community and consider the impacts of their operations on the community.

Philanthropy: Suppliers are encouraged to engage in philanthropic activities that benefit the local community, such as volunteering, charitable donations, and community development projects.

Stakeholder Engagement: Suppliers must engage with their stakeholders, including customers, suppliers, and local community members, to understand their needs and concerns and take appropriate action.

4. Environmental and Social Governance Principles

4.1 Environmental Sustainability

We expect our suppliers, and their own supply chain involved in providing services to Hastings, to minimise the environmental impact of their business operations and to promote environmental sustainability within their supply chains. Suppliers should also promote the use of environmentally friendly technology and conduct business with as low impact on the environment as possible.

Suppliers should have a clear and well-defined environmental policy that outlines their commitment to environmental sustainability and the actions they will take to reduce their environmental impact. This must be communicated to the supplier's personnel, customers, and other stakeholders, and made publicly available on their website or through other means.

Suppliers should seek to set measurable environmental goals and targets and regularly report on their progress towards achieving those targets via the Hastings annual ESG due diligence process.

Suppliers must demonstrate a commitment to reducing their environmental impact, including reducing greenhouse gas emissions, minimising waste, and conserving natural resources with intention to transition to low-carbon operations. This includes:

- Prioritising the use of renewable energy sources, sustainable packaging, and responsible sourcing of raw materials. This includes optimising operational services such as heating, ventilation and air conditioning (HVAC) systems.
- Establishing a means to reduce the carbon footprint of their transportation and logistics operations, including optimising delivery routes and using low-emission vehicles where possible.
- Respecting the biodiversity and natural habitats of the areas where suppliers operate and must not engage in or support any illegal or unsustainable exploitation of natural resources. Suppliers should monitor and manage their emissions to air, water, and soil, as well as the waste they produce. Suppliers should aim to cut down on waste and focus on reusing and recycling as much as possible. Any water used in operations should be treated and reused whenever possible.
- Avoiding or minimising the use of hazardous substances and materials and must ensure their safe handling, storage, transportation, and disposal. Substances should be properly marked and handled safely, with the usage of any restricted products respecting the European Union directives REACH2 and RoHS3 regulatory requirements, which can be found here:

[RoHS Directive - European Commission](#)

[REACH Regulation - European Commission](#)

4.2 Social Responsibility

We expect our suppliers to respect the human rights, dignity, and diversity of their personnel, customers, subcontractors, and other parties who are involved in their business. Suppliers must provide a safe, healthy, and inclusive work environment for their workers, including adequate training and protective equipment where necessary and not discriminate based on things like ethnicity, gender, sexual orientation, marital status, social or parental status, religion, political views, nationality, disability, medical status, age, or union affiliation. Expectations set by Hastings include:

- Suppliers must not use or benefit from any form of forced labour, child labour, human trafficking, or modern slavery in their business operations or supply chains.
- Suppliers must respect the freedom of association and the right to collective bargaining of their workers and must not interfere with or retaliate against any workers who exercise these rights.
- Hastings expects our Suppliers to proactively support the development of an inclusive and diverse workforce including fair representation of women, disabled, LGBTQ+ and black, Asian and minority ethnic supplier personnel and work to improve representation at senior levels.
- Suppliers must not tolerate any form of discrimination, harassment, abuse, or violence of their personnel.
- Suppliers should support the social and economic development of the communities where they operate in.
- Supplier are encouraged to align to the [United Nations Sustainable Development Goals](#).
- Suppliers should ensure that all personnel have written employment contracts specifying their terms of employment and termination rights. Suppliers must pay their workers fair and timely wages and benefits that meet or exceed the legal minimum or the prevailing industry standards, whichever is higher.
- Suppliers are encouraged to become a [disability confident committed employer](#) and continue to identify areas where disability inclusion can be improved within their business model. This includes creation of more accessible products and services, together with creating a more inclusive workspace for their workforce.
- Suppliers are expected to align to the [UN Principles of Responsible Investment \(UN PRI\)](#) by incorporating ESG issues in investment analysis, decision making, ownership policies and practices, along with seeking appropriate disclosure on ESG issues in relation to investments made.
- Suppliers must create an environment where people feel comfortable speaking up about any issues or concerns. They should encourage their colleagues to report any unethical behaviour or possible violations of laws, regulations, or company policies directly to their leader, HR, or their compliance team.
- Suppliers need to have clear processes in place for handling whistleblowing reports. They should make sure all reports are investigated quickly and confidentially, while protecting the whistleblower's identity, as required by law. Besides confidential whistleblowing channels being provided, suppliers should also have their own systems for reporting incidents to monitor operational risks. They should make sure their personnel and workers know about these reporting channels and systems.

4.3 Business Integrity

At Hastings, we are committed to maintaining the highest standards of integrity and ethical conduct in all our business dealings. Hastings requires all suppliers to operate with transparency, accountability, and fairness, thereby safeguarding the interests of all stakeholders involved.

Suppliers are expected to implement robust measures to prevent, detect, and remedy any instances of corruption, including but not limited to bribery, facilitation payments, and nepotism. It is imperative that suppliers develop and enforce an anti-bribery and corruption policy, provide relevant training to their personnel and workers, and establish internal controls to mitigate the risk of financial crimes such as money laundering, fraud, and embezzlement.

Suppliers are prohibited from directly, or indirectly through intermediaries, demanding, offering, asking for, promising, giving or accepting a gift or undue advantage in exchange of a business or other advantage from any party. Monetary gifts, gift cards, cash or other gifts that could be considered cash equivalents, are always considered improper.

Suppliers are expected to have processes in place to monitor and prevent conflicts of interest. Engagements and interactions between Hastings and its suppliers must not be influenced by personal relationships or personal interests. Suppliers must not enter into a financial, or any other relationship, with a Hastings' employee or third party that creates or gives the appearance of a conflict of interest.

Suppliers are expected to respect the free market regulations, preventing any supplier from taking part in industry cartels for price adjustments, market distortion or beneficiary services.

5. Working with Hastings

By accepting a contract or purchase order from any of the Hastings Group entities, or by conducting business with or on behalf of the Hastings Group, suppliers agree to comply with the SCoC and all applicable laws and regulations.

Suppliers are also responsible for ensuring that their personnel, subcontractors, and other representatives comply with the SCoC when working with or on behalf of the Hastings Group.