

**Cubico**  
SUSTAINABLE INVESTMENTS



# Supplier Code of Conduct

# Contents

SECTION 1	<b>Cubico's Values</b>	<b>4</b>
SECTION 2	<b>Application of this Code</b>	<b>5</b>
SECTION 3	<b>Anti-Bribery and Corruption</b>	<b>6</b>
SECTION 4	<b>Respect for Human Rights</b>	<b>7</b>
SECTION 5	<b>Health, Safety and Environment</b>	<b>9</b>
SECTION 6	<b>Reporting Wrongdoings</b>	<b>11</b>





## SECTION 1

# Cubico's Values

The Cubico Sustainable Investments Group (**"Cubico"**) is committed to the ethical and sustainable conduct of business and we pride ourselves on being a reputable and honest business. We have made that commitment with the strong support of our shareholders.

Our shareholders, business partners and the communities in which we work expect us to behave in a responsible manner. This means not only complying with the laws of the countries in which we operate but also aiming for best practice in everything that we do. These values apply regardless of whether local laws are enforced consistently, and regardless of whether others in the industry share them or not.

Cubico is a member of the UN Global Compact. We incorporate the Ten Principles of the UN Global Compact into our strategies, policies and procedures, and establish a culture of integrity to meet our fundamental responsibilities in the areas of anti-bribery and corruption, human rights, labour, and environment.

## SECTION 2

# Application of this Code

We view our suppliers as an extension of our own team, and so the manner in which they conduct their business naturally reflects upon us. As such, it is important to that our suppliers are committed to upholding our high ethical standards.

This Code covers suppliers, joint venture partners, sellers, developers, consultants, contractors and other types of third parties engaged to provide goods and services to or on behalf of Cubico (**together, "Suppliers"**) and is a formal statement

of the values, and fundamental principles we expect from them.

We request our Suppliers to adhere to this Code and to promote the same standards within their own organisations and their supply chains. We expect our Suppliers to maintain policies and procedures which ensure they meet the standards contained herein. Cubico will seek assurance from its Suppliers that they comply with this Code as part of the tendering process and through periodic review of compliance.





## SECTION 3

# Anti-Bribery and Corruption

Cubico expects its Suppliers to act ethically and transparently in all circumstances and maintain appropriate controls to ensure this.

In particular, we entirely reject bribery and corruption as a way of doing business. Suppliers must not give or receive bribes of any sort, or allow others to give or receive bribes on their behalf, or engage in any other kind of corrupt activity.

### In particular, Suppliers shall:

- not directly or indirectly offer or pay bribes;
- not directly or indirectly request, agree to receive or accept bribes;
- not directly or indirectly give advantages to public officials to influence them in their official capacity;
- ensure gifts and hospitality given or received are reasonable, proportionate and only so far as necessary;
- avoid conflicts of interests or potential conflicts of interests;
- not make or approve charitable or political donations to obtain or retain a business advantage;
- maintain accurate and complete financial records;
- screen the backgrounds of the people they work with to ensure they act ethically and with integrity; and
- maintain appropriate whistleblowing channels so that concerns can be escalated within their organisation.

## SECTION 4

# Respect for Human Rights

Cubico expects its Suppliers to observe and ensure, at all times, human rights compliance. In particular, the following principles shall be complied with:

**Voluntary employment:** Workers<sup>1</sup> shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime. All work must be carried out voluntarily and there shall be no mental or physical coercion to work. Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice in accordance with applicable laws and collective agreements, and without the imposition of any improper penalties.

**No confiscation of property:** Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment, and the withholding of property shall not be used directly or indirectly to restrict Workers' freedoms or to create workplace slavery.

**Charging of fees:** Fees or costs associated with the recruitment of Workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to Workers whether directly or indirectly. Similarly, Workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.

**Written terms of employment:** Workers shall have the terms of their employment or engagement set out in a written document that is easily understandable to them and which clearly sets out their rights and obligations. This written document shall include, but not be limited to, transparent terms with respect to wages, overtime pay, payment periods, working hours and rights in respect of rest breaks and holiday. Such written terms shall be provided to the Worker in advance of them starting work, shall be honoured by the employer and shall meet industry standards and the minimum requirements of applicable laws and collective agreements where the work is carried out.

<sup>1</sup> "Worker" means any individual who is employed or engaged by you to provide work or services (whether that individual is directly engaged by you or engaged via a third party, such as an employment agency used by you).



## SECTION 4 - CONTINUED...

**Payment:** Wages should be paid regularly and directly to the Worker and in legal tender. Methods of payment that have the effect of depriving the Worker of the ability to terminate employment are prohibited.

**No child labour:** There shall be no use of child labour. Nobody shall be employed under the minimum age. Subject to the overriding prohibition on the use of child labour, if Workers under the age of 18 are employed then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.

**No harsh or inhumane treatment:** Workers, their families and those closely associated with them shall not be subject to harsh or inhumane treatment including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation. Migrant Workers, their families and those closely associated with them should not be subject to discrimination due to their nationality.

**Complaints by Workers:** Workers shall be free to file grievances to their employers about the employer's treatment of them and Workers shall not suffer detriment, retaliation, or victimisation for having raised a grievance.

**Freedom to move:** Workers shall be free to move without unreasonable restrictions and shall not be physically confined to the place of work or other employer controlled locations (for example accommodation blocks) nor shall they be confined by more indirect means. There shall be no requirement placed on Workers that they take accommodation in employer controlled premises except where this is necessary due to the location or nature of the work being performed.

**Use of third party labour:** Where it is necessary to recruit Workers who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged. Where Workers are sourced to be employed directly, only reputable recruitment agencies shall be engaged. All such agencies must have the necessary licences and registrations under local laws.

## SECTION 5

# Health, Safety and Environment

The health and safety of our own employees and of Workers is paramount. Cubico expects its Suppliers to operate work environments that promote the health, safety and wellbeing of Workers and which strive to create injury-free workplaces.

### In particular, Suppliers shall:

- ensure a healthy and safe working environment;
- ensure that Workers and others engaged in the supply chain are adequately trained and provided with the proper equipment and working procedures to carry out their work safely;
- recognise that all Workers have a right and an obligation to raise health and safety concerns and to cease working if they feel it is unsafe to continue;
- report all health and safety incidents related to our project sites and in our workplaces;
- recognise the special needs of vulnerable Workers and ensure that their work and the conditions in which they are required to work create no direct or indirect physical, mental or other risk. Workers may be considered vulnerable due to their age (under 18's), their ability, pregnancy or otherwise;
- understand the risks to which their Workers are exposed and provide suitable and sufficient mitigation of those risks; and
- ensure that emergency preparedness arrangements are adequate for their Workers at our project sites and in our workplaces.



SECTION 5 - CONTINUED...



Cubico recognises its responsibility towards the environment and society and we are committed to operating our business in an environmentally and socially responsible manner to protect natural resources and continually improve our environmental performance.

Cubico expects its Suppliers to prioritise sustainable and socially responsible development and maintain appropriate mechanisms to assess and mitigate the impacts it operations may have on the environment.

**In particular, Suppliers shall:**

- comply with all applicable environmental legislation;
- integrate the principles of social and environmental responsibility and sustainability in their operations;
- keep an open and preventive approach to environmental challenges;
- seek to implement, develop and disseminate environmentally friendly responsible technologies; and
- promote the integration of policies, procedures and practices which take care of the environment in all management areas of their operations.

SECTION 6

# Reporting Wrongdoings

Cubico is absolutely committed to upholding the values and requirements set out in this Code. If a Supplier has concerns or witness any wrongdoing, we encourage them to share that concern with us. They can do that by sending a report, in confidence, to Safecall, our external, independent whistleblowing provider, at [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

## Report your Concerns in Confidence





We are working to support the:

**SUSTAINABLE  
DEVELOPMENT  
GOALS**

