

Introduction

“This Code” means this ESG Code of Conduct for a Supplier document.

“ESG” means Environmental, Social and Governance.

“Customer” in this Code means ATG Services (Ireland) Ltd, ATG Services (England) Ltd and ATG Services (Scotland) Ltd, all trading as “ATG Group”.

“Supplier” in this Code means any business or other entity that agrees to or does supply any goods, services or facilities to the Customer at any time.

The ESG policy of the Customer is to ensure so far as applicable and reasonably practicable that its operations, activities and conduct, and those of its Suppliers, will be carried out with a commitment to:

- (a) protecting and enhancing the environment by minimising negative impact and maximising positive impact on the environment;
- (b) ensuring appropriate conduct towards, positive impact on and good relationships with employees, customers/clients, suppliers and the community in which the Customer and its Suppliers operate; and
- (c) conduct their business with integrity and high standards of business ethics, through appropriate structures, systems, processes and procedures.

(“ESG Commitment”)

The ESG Commitment is a fundamental principle of the Customer’s business.

Customer’s General ESG Principles

In fulfilling the ESG Commitment, the Customer seeks to:

- Comply with all applicable local and national laws, rules, regulations and other measures having the force of law that are relevant to any aspects of the ESG Commitment; and
- Where it is practicable and appropriate to do so, establish and meet standards relevant to any aspects of the ESG Commitment which are higher than the standards imposed by law.

Suppliers’ Commitment

This Code sets out the minimum standards that must be met by the Customer’s Suppliers [and their suppliers and sub-contractors] to assist the Customer to maximise its ability to meet the ESG Commitment.

Each Supplier is required to:

- Comply with this Code;
- Adopt and implement policies, standards and processes fully consistent with the Supplier’s commitments set out under the Environmental, Social and Governance headings below; and
- Have systems in place to ensure compliance and to demonstrate that it is compliant; and
- Permit the Customer to conduct audits to verify the Supplier’s compliance with this Code

Environmental

The Supplier will:

- Ensure that its operations, the goods that it manufactures and the components that it incorporates into its goods comply with all applicable environmental protection laws and regulations
- Operate management procedures to include environmental factors
- Continuously improve environmental performance and integrate recognised environmental best practice into business operations
- Where possible, reduce consumption of resources and improve efficiency of those resources
- Encourage development of products, processes and equipment with concern for the future of the environment
- Promote environmentally friendly responsible purchasing within the Supplier and its goods and services supply chain
- Focus on action to conserve resources and energy, to minimise emission to air, water and land and to increase recycling rates
- Protect the environment by preventing pollution of land, air or water via leakage of liquids gases or solids
- Minimize its negative effect on biodiversity, climate change and water scarcity
- Swiftly respond to accidents or incidents that have a potential to threaten the environment
- Manage and dispose of all waste in a responsible manner in ways that show concern for the environment
- Use packaging materials that comply with all applicable environmental laws and regulations
- Ensure that it safely handles and transports all hazardous or toxic materials and products
- Provide advice to the Customer and others as appropriate on safe handling, transportation, storage and final disposal of the Supplier's products

Social

The Supplier will:

- Comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes, including the Modern Slavery Act 2015 and other laws etc. prohibiting forced or compulsory labour, child labour, bonded labour, prison labour
- Not infringe, and will prohibit its goods and services supply chain from infringing, any internationally recognized human rights, including those recognised in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work
- Provide and maintain a working environment free from all forms of discrimination, harassment and bullying, (e.g. union membership or political affiliation, gender, gender identity or expression, gender reassignment, sexual preference, race, colour, caste, creed, religion, nationality or national origin, ethnicity or ethnic origin, ancestry, age, marital or pregnancy status, civil partnership or disability)
- Not to discriminate in selection, engagement, placement, training, promotion, transfer or compensation or other treatment or dealing with any employees on the basis of union membership or political affiliation, gender, gender identity or expression, gender reassignment, sexual preference, race, colour, caste, creed, religion, nationality or national origin, ethnicity or ethnic origin, ancestry, age, marital or pregnancy status, civil partnership or disability or any other characteristic
- Promote diversity and inclusion amongst its and their workforce
- Comply with workplace health and safety laws and standards, and will take steps to mitigate risks to health and safety in the workplace, prevent workplace hazards and work-related accidents and injuries

- Provide fair remuneration (including overtime premiums), benefits, working hours, attendance, leave and sick leave policies, ensuring as a minimum that remuneration is sufficient to cover basic living requirements and that working hours do not exceed the maximum permitted by applicable laws and industry standards

Governance

The Supplier will:

- Ensure that it complies with all applicable local and national laws and regulations, relevant standards and codes of practice relating both generally and in particular to transparency and corporate governance
- Ensure that it has clear and effective governance for ESG
- Establish and maintain high standards of business ethics conduct, and promote a culture of integrity, honesty, ethical and responsible conduct in its business activities and behaviours
- Comply with all applicable laws relating to bribery and corruption (including the Bribery Act 2010) prohibit any bribery or corruption of, or by, any of its officers or employees
- Prohibit any money laundering by any of its officers or employees
- Avoid investment in or any other connection with, and prohibit its goods and services supply chain from investing in or having any other connection with, industries with a negative social impact, for example, gambling, tobacco, pornography or weapons manufacture/sales
- Comply with all applicable data protection laws and requirements (including the UK GDPR) when processing any personal data on behalf of the Customer, and maintain appropriate privacy and data security measures to protect the integrity and confidentiality of information held on its systems (including information supplied by the Customer) and information of employees goods and services supply chain, and ensure that there is no unauthorised access to any such information by third parties

Viewing and Updating this Code

The Customer will publish this Code (as amended from time to time) on its public website so that it is freely available to all Suppliers and others to view at any time.

The Customer will periodically review and update this Code as necessary.

On each occasion that this Code is updated, the Customer will notify Suppliers via the Customer's supplier and subcontractor management system that it has been updated and remind Suppliers that they can view the up-to-date Code on the Customer's public website, and the updated version of this Code will be effective thirty days after that notification.