

SERVICE EXPRESS CODE OF CONDUCT FOR SUBCONTRACTORS AND SUPPLIERS

1 Introduction

Environmental, Social & Governance (ESG) aims to ensure that companies work ethically, considering human rights as well as the social, economic, and environmental impacts of what they do as a business. Businesses should meet, and aim to exceed, any relevant legislation, and if legislation does not exist in a particular area, a company should strive to achieve and maintain best practice.

This code of conduct (the “**Code**”) reflects the core ESG values, ethics and standards by which Services Express does business with its customers, business partners, subcontractors, and suppliers. The Code reflects the wish of our organisation from the directors and senior management downwards to be seen as a responsible company that cares about people and the environment.

We therefore require all subcontractors and suppliers, whether supporting the business internally, or our customers, to reflect our values by complying with the Code. The standards presented in this document are also used in due diligence and selection processes when we are looking for new suppliers and subcontractors and also when reviewing the performance of existing organisations, we engage with.

All subcontractors and suppliers will be required to sign up to comply with this Code either by provisions within separate contractual agreements or being subject to Services Express’s standard terms of purchasing goods and services at <https://serviceexpress.com/en-gb/terms-conditions/suppliers>. Any breach of this Code will be viewed as a material breach of contractual arrangements.

2 Recruitment Environment

Basic Screening

Services Express recognises that success and continued growth is a direct result of not just the skills of its personnel but also of their professionalism, honesty, and integrity, enabling our customers and business partners to feel that they can rely on Services Express to always operate in an ethical manner. The selection and recruitment of the right people not just as employees, but also as subcontractors and suppliers is key to retaining this trust.

All subcontractors or suppliers providing services to Services Express must have performed basic screening of employees that will be working with Services Express (and be able to provide evidence of such screening on request). As a minimum screening should include confirming identity, the taking up of references, verifying background history for the three years prior to employment, and confirming the right of each individual to work in the United Kingdom (or the country in which they will be employed to work if different).

Additional Screening

Where a subcontractor or supplier is providing IT services to Services Express customers, employees involved in delivering the services, in addition to basic screening, must have undergone or provided a clean basic Disclosure and Barring Service (DBS) check (which should be repeated at least every three years) and have background history verified for five years prior to joining the employment of the subcontractor or supplier. Personnel failing the additional screening must not be allocated to work with Service Express customers.

Security Checks

Services Express is proud that it is frequently selected for the delivery of IT services, particularly hardware maintenance, for organisations in the public sector and/or hosted in very secure locations due to the nature

of their business. Any subcontractor or supplier assisting Services Express in the provision of such services may need to ensure and prove key employees are certified to a further level of security clearance prior to selection as well as be able to prove their identity by producing documents such as a passport or driving license when arriving at a customer location.

3 Workplace Environment

Treatment of Colleagues, Customers, Suppliers and Partners

Services Express aims is to provide a working environment that contributes to individual wellbeing and respects the rights of each person, ensuring everyone treats colleagues and staff from customers, subcontractors, suppliers, and business partners with respect. Any behaviour that undermines this aim is unacceptable. Services Express does not tolerate any form of harassment or bullying under any circumstances.

The responsibility to ensure that harassment does not occur in an organisation is the duty of its directors and managers, whilst all staff are expected to uphold the policy. A clear dignity at work policy should be maintained by all subcontractors and suppliers including examples of behaviour and values that are unacceptable and be readily available in an Employee Handbook, training course or equivalent information source.

Diversity and Equality

Services Express values diversity and seeks to provide all personnel with an equal opportunity for employment, career and personal development, based on ability, qualifications and suitability for the work as well as their potential to be developed into the job. We believe that people from different backgrounds can bring fresh ideas, thinking and approaches which make the way work is undertaken more effective and efficient.

Services Express will not tolerate direct or indirect discrimination against any person on grounds of age, disability, gender, gender reassignment, marriage, civil partnership, pregnancy, maternity, race, religion or belief, sex, or sexual orientation anywhere in its own organisation or that of customers, subcontractors, suppliers, or business partners.

It is also the responsibility of all subcontractors and suppliers working with Services Express to be able to demonstrate in their policies, business processes, and behaviour the promotion of inclusion, diversity, and equality. Each organisation is expected to comply with all relevant local and international legislation and to ensure that they do not discriminate against any individuals associated with the work environment.

Health and Safety

It is Services Express's policy that primary consideration is always given to health and safety and wellbeing. This applies to the maintenance of safe and healthy working conditions, equipment, and systems of work for all personnel and visitors and to provide information, training and supervision as needed for this purpose.

Suppliers and subcontractors must accept responsibility for the health and safety of others who may be affected by their activities, aim to encourage a positive attitude to health and safety within their organisation and to promote excellent health, safety, and welfare practices. A process should be in place to allow the reporting of all accidents, injuries and unsafe practices or conditions.

All suppliers and subcontractors should have policies and standards in place to provide a healthy and safe working environment for personnel and visitors. All personnel should receive full health and safety induction training on commencement of their employment and further awareness training provided where necessary, including attending any reasonable training required by Services Express or joint customers.

All personnel should be encouraged to refresh their knowledge of the health and safety policies at regular intervals. All visitors to company premises should be made aware on arrival of relevant health and safety procedures and given briefings in non-office environments such as data centres, warehouses, or other high risk areas. Access to all such areas should be controlled and restricted to authorised staff and visitors only.

Drugs and Alcohol

Services Express believes it is essential that all individuals are in full control of themselves and their faculties throughout the working day, whether working in their office or on customer premises. It is important in terms of their work, their relationships with their colleagues and customers. Any reduction in a person's faculties can also impact their ability to perform their job and produce quality work output.

We recognise the potential dangers to the health and safety not just of individual employees, but also their colleagues and our customers, from the abuse of alcohol or drugs (which could be both the use of illegal substances or misuse of prescribed/legal medication) if an alcohol/drug problem is untreated. Services Express is committed to providing all personnel with information about the effect of alcohol/drug misuse.

We expect the same standards from suppliers and subcontractors, all of which must maintain strict policies to ensure no unauthorised use of drugs or alcohol while personnel are engaged in any work related activity. Suppliers and subcontractors must respect Service Express' right and that of our customer to refuse access to premises where any individual is reasonably thought to be under the influence of drugs and/or alcohol.

Modern Slavery and Human Trafficking

Modern slavery and human trafficking is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Services Express has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all business dealings and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains. Our latest annual statement can be found at: <https://serviceexpress.com/en-gb/policies/modern-slavery>

Service Express is also committed to ensuring transparency in its business and approach to tackling modern slavery and human trafficking throughout its supply chains, consistent with legal disclosure obligations under the Modern Slavery Act 2015. The same high standards are expected from all suppliers and subcontractors we use to deliver goods and services to our customers, whether directly or indirectly.

As part of company engagement processes, we will perform due diligence on all suppliers and subcontractors which includes specifically ensuring there is no use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers and subcontractors can demonstrate holding their suppliers to the same high standards.

4 Business Environment

Compliance with laws and regulations

Services Express is committed to full compliance with all laws, rules, and regulations applicable to businesses operating in the United Kingdom, including any industry specific rules and regulations to which we must adhere given the nature of our customers. We expect the same from our subcontractors and suppliers, including compliance with any contractual flow downs Services Express is expected to pass on from customers.

Complying with laws, rules and regulations may sometimes mean engaging directly with regulators or other government bodies and that this may also be required of our subcontractors and suppliers on occasion. All such engagements should be professional, and on an open, clear and honest basis. Any subcontractor or supplier contacted directly by any regulators or other government bodies in relation to services being provided for Services Express must inform their Supplier Relationship Manager immediately where legally permitted.

Data Protection

As with all companies, Services Express handles personal data for its personnel. The nature of many services provided by Services Express means we are also often storing and undertaking processing of data belonging to our customers that may contain personal information relating to individuals. Even where such processing is not performed en masse, we are responsible for the safe keeping and proper use of business contact information relating to our customers as well as subcontractors, suppliers, and business partners.

Services Express is totally committed to protecting the personal data of individuals and expects the same from its subcontractors and suppliers, including having relevant fair processing notices in place, an overall data protection policy, as well as appropriate technical and organisational controls. We agree a comprehensive data processing agreement with customers where we process personal data and will require that relevant subcontractors and suppliers commit to having similar agreements in place with Service Express.

Information Security

Services Express maintains accreditation to ISO 27001 as the recognised standard for information security. As a minimum we expect all our subcontractors and suppliers to have a defined and enforced Security Policy with related procedures that address appropriate security controls for premises, networks and IT infrastructure. The need for such a Security Policy is a prerequisite where Services Express or customer information is held.

If a subcontractor or supplier requires access to the Services Express internal IT network and/or systems, including where such facilities are used for accessing joint customer environments, the subcontractor or supplier must agree to and comply with the Services Express “**Information Security Policy for Subcontractors and Suppliers**” available at <https://serviceexpress.com/en-gb/terms-conditions/suppliers/>.

Where a subcontractor or supplier is providing IT managed services to Services Express customers, it must have a Security Policy and Information Security Management System (ISMS) which is at least compatible with the ISO 27001 standard although formal accreditation to the standard is preferred and will reduce the need for Services Express or its customers to perform security related audits.

Information security procedures should include a documented process for handling security breaches, including for the loss, damage or unauthorised access to personal data and/or other confidential information. Procedures for handling security breaches must include clear steps for promptly informing Services Express of any security incident that affects its information or that of joint customers or puts such information at risk.

All subcontractor and supplier personnel should undergo regular (at least annually) audited awareness training on the organisation’s Security Policy, the potential risks and impacts of not appropriately caring for personal data and other sensitive information, and the procedures for reporting security breaches or concerns. All new employees should undergo similar awareness training as part of their induction.

Conflicts of Interest and Bribery

Services Express’s policy is to conduct all business in an honest and ethical manner, ensuring that personal interests do not conflict with professional duties. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

All Services Express personnel are required to familiarise themselves and strictly follow the company’s Anti-Bribery Policy. Subcontractors and suppliers must have an Anti-Bribery Policy in place that describes their organisation’s commitment and individual employee obligations regarding conflicts of interest, bribery, and corruption, including the receipt of unsolicited gifts or adhere to the Services Express available on request.

Accounting Practices

Service Express financial statements are prepared in accordance with the requirements of International Financial Reporting Standards (IFRSs) and applicable UK legislation. The Service Express Finance Team maintain

a robust system of financial controls to ensure that financial data is accurate, shows a true and fair view of the organisation's financial performance and position, and that the risk of fraud and error is minimised.

All Service Express financial statements are audited annually by independent auditors. Subcontractors and suppliers are expected to meet the same standards of accounting practice, or local equivalents, and are required to allow audits by Service Express appointed audit teams, which may include customers, of records relating to the goods and/or services being provided to Service Express and/its customers.

Due Diligence

Where subcontractors or suppliers assist in providing IT managed services to Services Express customers, in addition to committing to having appropriate data processing agreements, accreditations and processes in place, each subcontractor or supplier is expected to permit Services Express, applicable regulators or other government bodies, relevant customers, or their representatives to perform reasonable policy, business process and security audits, including testing of the controls that have been implemented.

5 Environmental Commitment

Services Express recognises that environmental protection as an integral part of its management function at all levels of the company. In line with our Environmental Policy, we view this as a primary responsibility and a measure of good business practice is adopting the highest environmental protection standards. We have a long term strategy to be carbon neutral as a business, including our energy intensive data centre operations.

Services Express's Environmental Policy calls for continuous improvement in our environmental management activities. All Services Express subcontractors and suppliers should have controls and processes in place to ensure that their current and future business activities cause no avoidable adverse environmental impact and that where practical they utilise technologies and materials that will minimise pollution, energy use and waste.

Service Express similarly expects each subcontractor and supplier to have a firm Environmental Policy aligned to its operations that communicates its environmental objectives performance to both personnel and customers, and that includes strategies for reducing waste and consumption of resources (materials, fuel, and energy), recovery and recycling, where feasible.

6 Whistle Blowing

Service Express encourages any subcontractor and supplier personnel to report any breaches of this Code to their management or where more confidentiality and/or anonymity are required or appropriate, to the Services Express Whistleblowing Report Line on 01234 224276. All subcontractors and suppliers are expected to provide their personnel with an appropriate reporting mechanism for breach of company policies.

Services Express and the law also recognises that in some circumstances it may be appropriate for concerns to be reported to an independent external body such as a regulator or independent helpline. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistle-blowing charity, Public Concern at Work, operates a confidential helpline: 020 7404 6609.

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