

# UNLIMITED BUSINESS PARTNER

## Code of Conduct

### Introduction

UNLIMITED is dedicated to conducting its business with the highest standards of conduct and compliance. UNLIMITED instils an ethical culture across its business and is vehemently focused on corporate social responsibility. UNLIMITED recognises the importance of all of its business partners sharing a similar level of commitment to an ethical culture and a support for the communities in which we operate and live.

This Business Partner Code of Conduct ('**Code**') describes Unlimited Marketing Group Limited and its subsidiaries' (collectively, '**UNLIMITED**') expectations of how its business partners/suppliers conduct business. We value all of our supplier relationships and we wish to work with suppliers who share our values around proper conduct. We therefore expect all suppliers engaged in providing products and services to UNLIMITED to act in accordance with this Code, including aligning guidelines, policies and practices, and communicating and enforcing the Code provisions throughout their organization and across their supply chain, including to subcontractors.

### 1) Labour and Human Rights

UNLIMITED recognizes its responsibility to protect human rights. Examples of such rights are articulated in internationally recognized standards, including the [Universal Declaration of Human Rights](#), and the International Labour Organization (ILO) Core Conventions.

#### a) Wellbeing

UNLIMITED is committed to bettering and supporting the mental health of its employees, supporting the physical health and wellbeing of its employees, and providing at or above living wage to its employees and we wish to work with suppliers that have values which are aligned with ours.

This includes, but is not limited to, provision of living wage for the location at which each employee works, the provision of time off to undertake volunteer work, the provision of free private counselling, career coaching and mental health care. We offer a cycle to work scheme, subsidised gym membership and encourage regular breaks.

We allow many employees to engage with UNLIMITED on non-standard contracts, which has opened up our ability to work with people who want to balance work with other passions in life.

**b) Supplier Equality, Diversity and Inclusion**

UNLIMITED believes that diversity is a social and economic imperative and looks to suppliers to share this commitment in their operations and within their supply chain. We expect suppliers will take proactive steps to provide a full spectrum of businesses – based on the ownership structure (for example, women owned, locally owned), scale (for example, small or medium enterprise) or nature of the enterprise (for example, social enterprise) – with the opportunity to compete on a fair and equal basis for business.

At UNLIMITED, we are committed to ensuring everyone is treated fairly with respect and dignity. We believe in a world of equality and diversity. This approach includes but is not limited to ensuring we operate with no unfair discrimination based on prejudice in respect of race, age, sex, religion, disability or sexual orientation.

**c) Equal opportunity**

As an equal opportunities' workplace, UNLIMITED believe it is not about who you know, but what you have to offer, that matters. We have a commitment to ensuring equal employment opportunity regardless of race, colour, ancestry, religion, socio-economic status, sex, national origin, sexual orientation, age, citizenship, marital status, neuro divergence, disability, gender, gender identity or expression. This is therefore why we are happy to take on work experience, apprentice, graduate and intern placements, offer freelance contracts and give our employees flexible working hours. We expect our suppliers to have values which are aligned with this, whereby equal opportunity is always upheld.

**d) Modern Slavery**

UNLIMITED does not tolerate slavery, forced labour, child labour or human trafficking in any form and the UNLIMITED will not knowingly work with suppliers who engage in these practices or permit their subcontractors to engage in these practices. We expect our suppliers to fully comply with requirements of applicable slavery, forced labour and human trafficking laws, including without limitation the UK Modern Slavery Act 2015. Our Modern Slavery Statement is available [here](#).

All work is required to be performed under and in accordance with contracts that have been entered into voluntarily. Suppliers should not use involuntary labour of any kind, including prison labour, debt bondage, or forced labour by

governments. Suppliers should not engage in practices associated with forced labour. These practices, [identified by the International Labour Organization \(ILO\)](#), include withholding of wages, retention of identity documents, and restriction of movement. Suppliers should put into place measures that ensure workers are not exploited by third party labour providers, such as recruiters or agencies. Such measures should include: caps on or elimination of recruitment fees; provision of contracts to all workers in their native language or other language which they are able to understand; elimination of deposits paid by workers to suppliers or recruiters to secure jobs.

Additionally, suppliers should not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no human trafficking exists within their extended supply chains.

## **2) Ethical Business Practices**

UNLIMITED is committed to conducting our business in accordance with the highest ethical standards and in compliance with all applicable laws, rules and regulations. We expect our suppliers to share our principles and uphold our standards and for each to develop policies and programs as appropriate to ensure that all workers understand and adhere to these standards.

### **a) Anti-Bribery**

UNLIMITED does not tolerate corruption or bribery in any form, and we expect our suppliers to fully comply with requirements of all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Suppliers will not directly or indirectly give, offer, or accept anything of value to obtain or retain business or favoured treatment, to influence actions or to obtain an improper advantage for UNLIMITED itself, or any third party. This includes any benefit, fee, commission, dividend, gift, cash, gratuity, services, consideration or any inducements of any kind to any UNLIMITED representatives, officers, agents or employees of UNLIMITED. Furthermore, suppliers should ensure the same of any affiliates, retained agents, subcontractors, intermediaries or workers. This prohibition extends not only to public officials, candidates for office, and workers of state-owned enterprises, but also to workers or officers of counterparties, clients/customers, suppliers, any agent of the aforementioned parties, or any other person with whom the supplier does business or anticipates doing business.

### **b) Confidentiality**

We expect our suppliers to protect our and our clients confidential information. Suppliers should adopt and maintain processes to provide reasonable

protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of UNLIMITED. Suppliers should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational and financial consequences for the supplier, individuals whose personal information may be implicated, and for UNLIMITED. In addition, suppliers must comply with all applicable privacy / data protection and information security laws and regulations.

**c) Risk Management Systems**

UNLIMITED encourages our suppliers to institute effective management systems that utilise the best available techniques and practices to adhere to this Code and continuously improve their performance. This should include a process for the identification and proactive mitigation of risks associated with compliance to this Code, as well as a process for ongoing monitoring and review of risk controls, and prompt and accurate reporting of all incidents.

**d) Grievance Mechanism and Conflicts**

We expect our suppliers to have a process through which workers can raise workplace concerns. This grievance mechanism should be transparent and understandable to workers and should ensure the protection of whistleblowers. UNLIMITED has a whistle-blower policy in place that are clearly communicated to staff and a safe environment is fostered to allow whistle-blowers to come forward without fear of retaliation.

**e) Anti-Trust and Competition**

We are committed to free and open competition in the markets in which we operate. We conduct our business to the highest standards of honesty and integrity, competing fairly and ethically and we expect our suppliers to do the same. It is our belief that strong success can only be delivered through a sustainable business, which is why UNLIMITED uphold the strictest standards of business ethics and put safety at the forefront of everything we do.

**f) Prompt payment of suppliers**

Our suppliers should have reasonable and lawful payment policies with their own suppliers and subcontractors.

**g) Respect and Professionalism**

We ask our suppliers to promote respect and inclusion throughout all operational activities and in relevant publicity materials. Our suppliers should always ensure service delivery, communications, actions and resources demonstrate sensitivity to issues of respect and are adapted as necessary.

**h) Anti-tax evasion and anti-facilitation of tax evasion**

UNLIMITED will not tolerate unlawful tax evasion or the facilitation of unlawful tax evasion. Suppliers should not directly or indirectly engage in, or facilitate the engagement by others in, the deliberate and fraudulent diversion of funds from a tax authority. We also expect suppliers to ensure the same of their agents, subcontractors, intermediaries and workers by adopting, maintaining and implementing reasonable processes that prevent such conduct.

**3) Environmental Stewardship**

Environmental stewardship is a key aspect of how UNLIMITED operates our business. We encourage our suppliers to adhere to similar environmental efforts as appropriate to their businesses and aligned with best practices locally and globally. This includes implementing processes to identify and manage risks and opportunities related to climate change and sustainability.

We fully encourage Suppliers to commit to identifying and minimizing the adverse effects of its manufacturing operations on the community, environment and natural resources, and to safeguarding the health and safety of the public from such adverse effects. UNLIMITED comply with recognized management systems such as ISO14001 and the Eco Management and Audit System (EMAS) and we expect our suppliers to comply with these standards or maintain similar standards. Suppliers are expected to stay current with evolving industry standards and best practice and incorporate other such management system standards and guidelines as they deem relevant based on their industry expertise

We encourage our suppliers to track, manage, and mitigate the environmental impact of their operations and strategies, including those of their suppliers. Where feasible, suppliers should take steps to incorporate how they will mitigate the impact of climate change into their strategies and business resiliency plans, through establishing greenhouse gas (GHG) emission reduction targets, selecting low-GHG products and services, and other initiatives, where relevant.

Suppliers are encouraged to take steps to conserve, reduce use of, and reuse water in their own operations. Suppliers are also encouraged to manage water resources to ensure their operations do not prevent access to sufficient safe water for all users in surrounding communities, including those both up and downstream from their facilities.

Suppliers are encouraged to take concrete steps to minimize or eliminate waste across their operations and those of their suppliers. Any waste, and in particular

hazardous waste, must be managed in a responsible manner. Chemical and other materials posing a hazard if released to the environment should be identified and managed to ensure safe handling, movement, storage, recycling or reuse and disposal.

All materials used by suppliers should comply with applicable rules, laws, and regulations regarding the prohibition or restriction of specific substances to ensure safe and responsible handling, storage, movement, reuse, recycling and disposal.

#### **4) Audit Rights**

We expect our suppliers to join us in our commitment to transparency and disclosure. If requested, suppliers shall provide details and data about their performance on the topics included in this Code to UNLIMITED or its clients.

#### **5) Cyber Security, Privacy, Data Protection and Data Integrity**

UNLIMITED take the safety of personal data, agency information and client information extremely seriously. To put us in the best possible position to meet the highest standards, we have a dedicated Group Data Protection Officer and Group Information Security Officer, and conduct regular training and assessments of our personnel in information security and data protection. UNLIMITED are also audited to ISO27001 certification, the worldwide standard. Furthermore, we have Cyber Essential Plus certificate, are a member of the ICO and have Data Seal certification.

UNLIMITED encourages our suppliers to adopt and maintain processes and procedures aligned with the company's commitment towards information security standards ISO27001 and Cyber Essentials Plus, to provide reasonable protections for personal, proprietary, and confidential information, implement and maintain at all times appropriate technical and organisational measures to ensure a high level of security. Suppliers must comply with all applicable Data Protection Laws including but not limited to the Data Protection Act 2018 and GDPR (EU) 2016/679 in Processing Personal data and to provide assistance and information as is reasonably required by the Company to assist the Company in complying with its own obligations towards privacy under Data Protection Laws and regulations.

#### **6) Governance of this Code**

This Code sets forth our expectations for current and future suppliers. We require all new and existing suppliers to meet our minimum expectations and to aspire to make continuous improvements to their businesses as noted herein across ethical, human and labour rights, supplier diversity and inclusion and environmental areas.

We ask that any facts or circumstances which are likely to lead to your inability to meet the requirements and expectations of this Code be reported immediately to your UNLIMITED relationship manager in writing. Retaliation of any kind against an individual who reports concerns in good faith violates UNLIMITED's principles and is not something we tolerate.

If a supplier is found to be in violation of the requirements of this Code, we ask that supplier to inform us immediately or as soon as is practicable and remedy any such violation in a timely and sensitive manner. Failure by a supplier to do so may lead to review or termination of our relationship.

UNLIMITED is committed to continuously reviewing and updating this Code. Therefore, this Code is subject to modification from time to time. The contents of this Code are additional to and do not in any way affect or prejudice any of UNLIMITED's rights and remedies under the relevant contracts with each supplier, if any.

The failure or omission by UNLIMITED to insist upon strict performance and compliance with any of the provisions of this Code at any time shall in no way constitute a waiver of its rights. In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant contract with any supplier, the provisions of that contract will prevail.

## **Monitoring and Review**

UNLIMITED maintains the right to spot-check its suppliers' compliance with this Code at any time. UNLIMITED also maintains a right to conduct annual reviews of suppliers, particularly for those that contribute to UNLIMITED's services provided to the UK Government where the highest standards are to be upheld and monitored. For those suppliers in particular, our published Social Values are required to be equally met by such suppliers.

Where UNLIMITED deems, in its sole discretion, any supplier is not meeting the requirements of this Code, it reserves the right to (i) provide a three month warning to allow the supplier time to meet the Code's requirements and/or (ii) immediately terminate any contract of supply with that supplier where the failure to meet this Code is of sufficient concern or seriousness to warrant such immediate termination.

In conclusion, we place high value on all of our supplier relationships and ask all suppliers join us in compliance with the highest standards of conduct and compliance.