

# Supplier Code of Conduct

AMP Clean Energy Code of Conduct for Suppliers



## Purpose

Our Code of Conduct exists to support our vision that everything we do will be in accordance with good governance, rigorous HSEQ standards and follow high ethical standards of behaviour.

Our Code of Conduct sets out what we value as a company, and our expectations with respect to key areas for our contractors, subcontractors, and suppliers who are expected to read, understand, and follow to ensure excellence for AMP Clean Energy's customers and stakeholders.

AMP Clean Energy also encourages Suppliers to participate in initiatives aiming to raise the standard of the renewable energy industry and/or across other sectors where we work.

AMP Clean Energy reserves the right to revise and update this Supplier Code of Conduct from time to time.

## A message from the Chief Executive Officer Mark Tarry:

"At AMP Clean Energy we are dedicated to ensuring business is governed safely, sustainably and ethically.

The standards and behaviours we value underpin our ethos of delivering a better future. We believe the general principles contained within this Code of Conduct are critical to our success and to those involved in our supply chain.

All suppliers should familiarize themselves with the Code and ensure that they understand and comply with the guidelines and policies set forth, in order to work together to achieve our collective goals".



## Health Safety, Environment & Quality

At AMP Clean Energy we are dedicated to maintaining a positive health, safety, environment and quality (HSEQ) culture throughout the company and continuously aim to achieve, maintain, and improve our HSEQ performance both internally and with our supply chain.

Suppliers are expected to provide a safe and healthy workplace for all of your employees and shall conduct your business in an environmentally sustainable way. In particular, you will:

- Comply with all applicable regulations, legal requirements and AMP Clean Energy policies / procedures.
- Ensure all workers are aware of all risks and are appropriately trained to implement the required control measures.
- Cease work immediately and safely if you believe it is a threat to people, property, or the environment.
- Follow mandatory safe work procedures and stop / escalate to supervision if you are unable to comply with them.
- Ask for help if you are not sure about a potential HSEQ issue.
- Intervene – at a safe time - if you witness an unsafe act or condition – never walk past.
- Report all illnesses, injuries, , incidents, near misses and any unsafe conditions or anything suspicious to AMP Clean Energy.
- Always know the appropriate protocol in case of emergency.
- Manage your activities responsibly in relation to environmental risks and associated impacts. Resources such as water and energy must be used efficiently and impacts on biodiversity should be minimised.
- Handle and dispose of hazardous substances properly and safely.
- Segregate waste and recycle where possible.
- Use the correct personal protective equipment (PPE) required for the task you are undertaking.

## People

At AMP Clean Energy we are committed to ensuring a supportive, diverse and inclusive work environment with equal opportunities for all workers.

We aim to provide a safe, secure, violence-free and healthy working environment for all our employees, contractors and suppliers. We believe that all accidents and occupational illnesses and injuries are preventable. We will not tolerate any instances of violence or the threat of violence at any of our workplaces or sites.

AMP Clean Energy expects our Suppliers to contribute to a respectful workplace and as such we maintain our commitment to ensuring supplier welfare and human rights, free from harassment, bullying, forced labour or poor working conditions whilst working for us or on our premises.

All employees must be treated fairly and not discriminated against in any form of employment. Suppliers must not discriminate against any employee based on age, gender, sexual orientation, race, ethnicity, colour, disability, religion, political affiliation, union membership, national origin, marital or pregnancy status during any recruitment or employment activities.

- Suppliers shall not participate in, or benefit from any form of forced labour, including bonded labour, child labour, involuntary prison labour, modern slavery, human trafficking, servitude, or work performed under the menace of a penalty or coercion.
- Suppliers shall ensure methods are put in place to report and stop any form of forced labour or modern slavery putting metrics in place to increase the standards of its supply chain. AMP Clean Energy is committed to supply chain development.
- Suppliers should make available appropriate grievance mechanisms that are available to personnel and interested parties, including affected communities, to make comments, recommendations, reports or complaints concerning the workplace, the environment or supplier's business practices.
- Suppliers shall have routines for dealing with harassment and communicate that any form of harassment is unacceptable and must be reported.

## Compliance, Anti-Bribery and Corruption

Suppliers will comply with all applicable local and national laws, rules, regulations and requirements in the provision of goods, products and services to AMP Clean Energy. It is the Supplier's responsibility to maintain and enforce these standards at all levels within its own supply chain.

At AMP Clean Energy we conduct our business to the highest standards of ethical behaviour and insist that our Suppliers do so to. Unethical and corrupt practices will not be tolerated. Suppliers must avoid all forms of bribery and corruption including facilitation payments and the giving or receiving of inappropriate gifts and hospitality. Both employees and suppliers alike must also avoid any real or potential conflict of interest.

AMP Clean Energy maintains guidelines for the offer and acceptance of hospitality and gifts. Suppliers must also ensure that any gifts or hospitality they receive or offer should always be reasonable in terms of value, frequency and timing and not intended to improperly influence the performance of anyone's duties.

- Suppliers shall not engage in or tolerate any form of corruption, bribery, money laundering, extortion, or embezzlement. Suppliers shall not offer or accept any benefits and/or use agents to obtain any undue or improper advantage. Such improper benefits may comprise cash, non-monetary gifts, pleasure trips or services and amenities of any other nature.
- Suppliers shall ensure adequate procedures are in place in compliance with the Bribery Act 2010 and the Criminal Finances Act 2017.
- Suppliers shall avoid conflicts of interest that may compromise the supplier's credibility in the AMP Group such as personal relationships, family member affiliation etc.
- Suppliers shall respect and comply with all applicable competition laws and regulations, including an obligation not to exchange commercially sensitive and strategic information with competitors or to enter into anti-competitive agreements.
- Suppliers shall respect AMP Clean Energy intellectual property rights and protect our information by safeguarding it against misuse, theft, fraud or improper disclosure.
- Suppliers shall comply with all applicable data protection laws in collecting, processing, storing and handling personal data of all employees, suppliers and third parties.
- Suppliers shall not utilise counterfeit parts or materials and shall maintain effective processes to protect against this.
- Suppliers shall refrain from misuse or abuse of social media platforms.
- Suppliers must comply with all applicable import and export control laws and regulations including embargoes, sanctions, and anti-boycott rules.

## Commitment to this Code of Conduct

AMP Clean Energy is committed to the highest standards of compliance and business integrity. We expect all Suppliers to comply with this Code of Conduct in practice and spirit and to pass this down to all levels of the supply chain.

AMP Clean Energy reserve the right to conduct due diligence within the supply chain by carrying out audits and/or assessments of Suppliers' compliance with this Code of Conduct and their financial, ethical, environmental, technological, operational, and social strengths to identify risk factors in our supply chain.

AMP Clean Energy also expects Suppliers to conduct appropriate due diligence in their own operations and supply chain and shall assess whether their own operations, or supply chains are compliant with the principles of this Code of Conduct.

If the Supplier feels they are unable to comply with any aspect of this Code of Conduct or becomes aware of any area in which it is not compliant with it, they should immediately notify its contact at AMP Clean Energy to agree how such failure will be rectified. A failure to comply with this Supplier Code of Conduct may be considered a material breach under the applicable contract.

If a Supplier, its employees, its contractors, or any other stakeholder believes that the terms of this Code of Conduct are not adhered to, AMP Clean Energy encourages such concerns to be raised via the whistleblowing reporting channel:

### Jamie Carroll

Head of HR

jamie.carroll@ampcleanenergy.com  
07545 220207

### James Bruce

General Counsel

james.bruce@ampcleanenergy.com  
07545 220207

### Protect

(Independent whistleblowing charity)

whistle@protect-advice.org.uk  
020 3117 2520  
www.protect-advice.org.uk

- Suppliers should have adequate management systems and controls in place in proportion to the size, complexity and risk environment of the supplier’s business. Suppliers should secure and monitor that their own suppliers and sub-suppliers comply with the AMP Clean Energy Supplier Code of Conduct.
- AMP Clean Energy are invested in supplier development and is committed to working with suppliers to achieve continuous improvement.
- Suppliers complete the AMP Clean Energy Supplier Pre-qualification forms.
- AMP Clean Energy will routinely set out expectations against the Supplier Code of Conduct which shall be discussed openly in Supplier reviews against any short comings which should be improved. The supplier should then take corrective actions promptly and commit to showing progress.
- Persistent failure to comply with the AMP Clean Energy Supplier Code of Conduct or repeated and unjustified refusal to provide the required information may also result in suspending or terminating the Supplier’s activities.

## Summary

Whilst it can be challenging to predict every possible ethical scenario which could face us, AMP Clean Energy believes in maintaining a high standard of integrity for the benefit of all our people and the communities in which we operate is extremely important. Therefore, by signing AMP Clean Energy Supplier Code of Conduct we expect our Suppliers to be guided by both the letter and the spirit of this Code.

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Signed by supplier

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For and on behalf of

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Date

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