Comms-care

Supplier Code of Conduct

For use by Suppliers delivering services on behalf of Comms-care.

Revised: January 2025

Contents

1. Quality 4
2. Service Delivery 5
2 Security 7
3 Environment 9
4 Business Continuity 10
5 Health & Safety 11
6 Labour rights 12
7 Ethics 13

Introduction

Comms-care strive to operate in a responsible manner, reduce and mitigate risk, and continuously improve. Comms-care will only do business with suppliers, contractors, and consultants (collectively 'Suppliers') who comply with applicable laws, rules, and regulations (collectively 'applicable laws') and commit to our standards of business conduct, as set forth in this Supplier Code of Conduct. Comms-care expects that Suppliers, their employees, sub-suppliers, and any other parties involved with the execution of Comms-care's work, similarly comply with applicable laws, and commit to the standards set forth in this Code.

Fundamental to adhering to the Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules, and regulations of the countries in which it operates. The Code also encourages Suppliers to go beyond legal compliance, drawing upon internationally recognised standards, in order to advance social and environmental responsibility and business ethics. In no case can complying with the Code violate local laws.

It is the responsibility of the Supplier to ensure they are referring to the up-to-date version of the Supplier Code of Conduct, available from www.comms-care.com.

The Supplier is also responsible for ensuring they are referring to the up-to-date versions of the Policies referred to in this Code of Conduct, these can be obtained from Supplier-Management@comms-care.com &/or flexible.resourcing@comms-care.com

We appreciate our Suppliers' commitment to responsible business practices.

Comms- care Group Ltd

1. Quality

Comms-care's primary focus is to satisfy our customers' requirements and exceed expectations wherever possible.

This can be achieved when the following principles are embraced by Comms-care's suppliers who have either direct or indirect contact with our customers.

The supplier will:

- Use recognised industry practices in the delivery of goods and service to, or on behalf of Comms-care.
- Supply high quality products and services that comply with all specific requirements, delivered on time and without defect
- Ensure all goods and services are in compliance with all relevant laws and regulations
- Provide appropriate training, instruction, and supervision to ensure all employees are able to perform their duties
- Provide goods and services in the spirit of ISO 9001:2015, or preferably be certified to ISO 9001:2015
- Have procedures &/or instructions controlling manufacturing or service provision
- Have the ability to be able to detect inferior products or services and undertake corrective action as required
- Have the ability to check and control the quality of incoming goods and services and undertake corrective action as required
- Have the ability to identify how goods and services can be continuously improved bring innovation, ideas, and expertise to help Comms-care address its strategic challenges, improve quality, and support growth
- Be aware of Comms-care's Quality Management Policy, a copy of which has been provided as part of onboarding included in the Code of Conduct Microsoft Forms submission, please note an updated version is available on request from Supplier-Management@comms-care.com &/or flexible.resourcing@comms-care.com.
- Be aware that Comms-care may conduct an audit of supplier's Quality Delivery arrangements

2. Service Delivery

Service quality and performance is of paramount importance to Comms-care

The supplier agrees to:

- Ensure that all their staff appear and conduct themselves professionally
- At all times, operate in such a way as to protect the Comms-care brand and ensure that it continues to be looked upon favourably
- Provide services on a “white label” basis unless informed otherwise
- Perform in the agreed manner/use the agreed procedures to the deliver the defined requirements received from Comms-care or its customers and, where this proves impractical, notify Comms-care at the earliest opportunity
    - The agreed procedures may be the supplier’s, Comms-care’s, the end-users, or the reseller’s, depending on the nature of the work
- Deliver to the agreed scope of work as outlined in the relevant contract/agreement/purchase order/Ts&Cs/similar
- Comply with any agreed SLAs and targets/time frames agreed
- Make any necessary risk assessments to minimise service disruption or degradation
- Where appropriate test solutions prior to implementation and make (and apply if needed) back-out arrangements
- Document the roles, responsibilities and work required for any sub-contracted work, ensuring a suitable contract is in place between the contractor and sub-contractor
- Not actively solicit any employee from Comms-care from within 6 months of the last engagement.
- Work with Supplier Management within a reasonable time frame.
- Ensuring any relevant department within the company have an active involvement with ensuring the services provided are at the standard Comms-care expect.
- Keep Comms-care appraised of progress and outcome, obtaining any pre-determined sign-offs required and submitting any completion documentation, job sheets or reports as specified
    - The latter will be used as inputs to the charging process, which will be on the basis already agreed with Comms-care
    - It will also be used as part of a formal service performance review
    - Comms-Care also reserve the right to request performance statistics from any supplier to aid supplier monthly reviews and to gauge supplier performance.

- Be aware of Comms-care's Service Management Policy, a copy of which has been provided as part of onboarding included in the Code of Conduct Microsoft Forms submission, please note an updated version is available on request from Supplier-Management@comms-care.com &/or flexible.resourcing@comms-care.com.
- Be aware that Comms-care may conduct an audit of supplier's Service Delivery arrangements

2 Security

Comms-care takes very seriously all aspects of security both for its own company security and when delivering service to its customers. The same level of diligence is required from all subcontractors who supply services on our behalf. Our suppliers are required to comply with all relevant legal and regulatory requirements (including data protection), and to notably:

a. Familiarise themselves and comply with all security requirements which apply to the customer/ site / systems on which they are working.
b. Ensure that all staff are fully briefed around end-user security policies, procedures, and requirements.
c. Secure all hardware to protect from damage, theft, unauthorised use etc.
d. Secure any customer data, personal information, or other data/media to protect from unauthorised disclosure, corruption, damage.
e. With regards to all personal, sensitive, or confidential data received from Comms-care or relating to its staff, resellers, end users, suppliers, or supplier's supply chain:

   Will:

   - Appropriately process: accurately; fairly; lawfully; transparently and only for the purpose for which the data was made available.
   - Retain the capability to remove the personal, sensitive, or confidential data.
   - Upon a suitable request, securely destroy identified personal, sensitive, or confidential data and provide an attestation to Comms-care to confirm the destruction.
   - Ensure that personal, sensitive, or confidential data is protected and remains on encrypted storage at all times.

   Will not:

   - Transfer to a third party without Comms-care's knowledge and not transfer outside of the EEA without Comms-care's express prior permission.
   - Keep for longer than necessary or for any other purpose than that for which the personal data was made available

f. Where required, ensure that staff used meet the relevant security clearances for the work and/ or customer site and clearly display any security badging/similar identification required.
g. Note the requirement that all work carried out on the customer's behalf must have a scope of work. Any deviation from the scope of work requires authorisation prior to commencing work.
h. Remove data from site only with the express authorisation of the customer, and where stored on mobile/ portable devices, data must be stored in an encrypted form.
i. Send Confidential/ Sensitive information via email only if it is encrypted (an encrypted zip file is

acceptable).

j. Connect to the customer and/or Comms-care network only with prior approval and in the specified pre-approved manner ensuring that any passwords provided are not disclosed to any third party.

k. Report any security incident to the Comms-care Managed Services Desk (+44 0870 2644 305 Option 2) in a timely manner.

l. Communicate any security concerns to the Customer and document within the site visit report (SVR).

m. Be aware of Comms-care's public Security Statement which can be found using this link: Comms-care Security Statement

n. Be aware that Comms-care may conduct an audit of supplier's security arrangements.

3 Environment

Comms-care considers the environmental impact in all aspects of its business. As part of an established Environmental Management Systems (EMS) and to ensure sustainability of resources, all Comms-care suppliers and sub-contractors are expected to comply with all relevant environmental legislation and consider:

- The economic, social, and environmental aspects of sustainability in relation to all goods and services provided by themselves and throughout their supply chain
- Applying ethically the Waste Hierarchy in all services provided to Comms-care
- The environmental aspects of their business and how these can be minimised
- Having an environmental policy available on request

The supplier is also required to:

- Report to Comms-care any environmental incidents or events which occur when performing services on behalf of Comms-care
- Effectively communicate the Environmental Policy and procedures to their staff and other interested parties
- Complete work within any environmental requirements sent to any supplier
- Be aware of Comms-care's Environmental policy, a copy of which has been provided as part of onboarding included in the Code of Conduct Microsoft Forms submission, please note an updated version is available on request from Supplier-Management@comms-care.com &/or flexible.resourcing@comms-care.com.
- Be aware that Comms-care may conduct an audit of supplier's Environmental protection approach

4 Business Continuity

Comms-care recognises how seriously a major disruptive event could affect its service delivery to customers, to the extent that it has become ISO22301 (Business Continuity Management Systems) certified. Whilst Comms-care does not expect its suppliers to become certified themselves, it does expect an awareness and some forethought about how a disruptive incident could affect their service delivery on behalf of Comms- care. Therefore, the supplier must maintain business continuity arrangements to allow them to continue to provide service to Comms-care and their customers in the event of a failure situation.

Suppliers are required to:

- Notify Comms-care if they experience a disruptive event likely to interrupt their service delivery
- Be aware of Comms-care's Business Continuity policy, a copy of which has been provided as part of onboarding included in the Code of Conduct Microsoft Forms submission, please note an updated version is available on request from Supplier-Management@comms-care.com &/or flexible.resourcing@comms-care.com.
- Be aware that Comms-care may conduct an audit of supplier business continuity arrangements.

Suppliers are encouraged to:

- Consider how a disruptive incident to their business could have a knock-on effect on their service delivery to Comms-care and/or its customers
- Consider how they would protect their service delivery in the event of a disruptive incident (e.g., by prevention, mitigation, planned response and with continuity and recovery arrangements)

5 Health & Safety

Health, safety, and wellbeing of individuals is of paramount importance to Comms-care who have a duty of care not only to its staff but to all who interact and provide service on behalf of the company. Therefore all suppliers and sub-contractors should comply with all legal H&S requirements and:

- Conduct themselves and their work in a safe and appropriate manner
- Conduct risk assessments or provide safe systems of work when required to control risk
- Ensure appropriate Personal Protective Equipment (PPE) is used at all times
- When providing a service on behalf of Comms-care, report any accidents, incidents or near misses within their own company and also to Comms- care
- If required, have a current documented H&S Policy and relevant COSHH documentation available on request
- Effectively communicate H&S Policy and requirements to their staff and other interested parties
- Be aware of Comms-care's H&S policy which can be found using this link: Comms-care Health and Safety Policy
- Be aware that Comms-care may conduct an audit of supplier's H&S arrangements.

6 Labour rights

Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

Comms-care recognises labour standards as:

- **Freely chosen employment** – forced, bonded (including debt bondage) or indentured labour or exploitative prison labour, slavery or trafficking of persons is not permitted
- **Young workers** – child labour is not to be used; the term 'child' refers to any person under the age of 16. Workers under the age of 18 shall not perform work that is likely to jeopardise their health or safety, including night shift and overtime
- **Working hours** – working hours are not to exceed the maximum set by local law
- **Wages and Benefits** – compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted
- **Humane treatment** – there is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers
- **Non-Discrimination / Non-Harassment –** suppliers are to be committed to a workplace free of harassment and unlawful discrimination and will follow local discrimination in the workplace laws

7 Ethics

We expect our suppliers to embrace ethical behavioural practices.

Comms-care is committed to a comprehensive Ethics Policy concerning ethical diversity and equality for its staff and all those they interact with. Suppliers connected with our business are expected to select individuals based on their relevant merits and abilities without regard to 'protected characteristics' from the Equality Act 2010 including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Under the Employment Rights Act 2025 as an employer, we must take all reasonable steps to prevent the harassment of its employees, including harassment by third parties including suppliers. Comms-care expects our suppliers to take all reasonable steps to protect against harassment / bullying to any relevant protected characteristics (age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation) and applies to conduct that occurs in person or online.

Comms-care is also committed to ensuring that human rights are upheld and complies with the Human Rights Act 1998. Comms-care is fundamentally opposed to any form of slavery both internally and through its supply chain. Suppliers are expected to uphold these principles in all of their dealings.

Any supplier who is found to be in breach of either social or ethical responsibilities will be immediately struck off Comms-care's Approved Supplier List and reported to the Authorities.

A copy of Comms-care's Ethics policy has been provided and is available on request.

To meet social & ethical responsibilities and to achieve success in the marketplace, suppliers and their suppliers are to uphold the highest standards of ethics including:

- **Business Integrity –** the highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion, and embezzlement
- **Facilitation of tax evasion –** Comms-care has a zero tolerance towards tax evasion and the facilitation of tax evasion. This type of conduct is prohibited whether committed and/or facilitated by the Company or any Associated person.
- **No improper advantage –** bribes or other means of obtaining undue or improper advantage are not promised, offered, authorised, given, or accepted. This prohibition covers promising, offering authorising, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage
- **Disclosure of information –** all business dealings should be transparently performed and accurately reflected on the supplier's business books and records. Information regarding supplier's labour, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable

regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practise in the supply chain are unacceptable

- **Intellectual property –** Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information is to be safeguarded
- **Fair business, advertising, and competition –** standards of fair business, advertising, and competition are to be upheld
- **Protection of identity and non-retaliation –** programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistle-blowers* are to be maintained, unless prohibited by law. Suppliers should have a communicated process to their personnel to be able to raise any concerns without fear of retaliation
- **Privacy –** Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared

** Whistle blower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.*