

## Supplier Code of Conduct

The purpose of this Supplier Code of Conduct (the “Code”) is to set out clearly the standards and principles for our suppliers to ensure safe and fair working conditions throughout the supply chain. Ensuring our suppliers are aligned with the business values of Hibernia Real Estate Group Limited (“Hibernia”) on environmental, social and ethical issues is of paramount importance to us.

This Code is by no means exhaustive. Statutory obligations must be fulfilled, and industry best practices should be followed by our suppliers.

All our suppliers are expected to read, acknowledge and comply with the standards and principles set out in this Code, though we acknowledge that they will apply to suppliers in different ways depending upon the nature of their business, even if the fundamental principles remain the same.

We are ready to assist and work together with suppliers who are seeking to adhere to the requirements of the Code. The responsibility for compliance however rests solely with the supplier.

### Governance

Hibernia’s policy is to conduct our business in an honest, open and ethical way and to comply with all applicable laws and legislation. We will not tolerate any form of corruption, bribery, modern slavery or anti-competitive behaviour or actions in our supply chain.

We require all suppliers to have an anti-bribery and modern slavery policy in place to demonstrate their commitment to conducting all aspects of their business in a fair, open and honest manner. The policy should be clear, unambiguous and state that any form of bribery is never acceptable and will not be tolerated. We have a zero-tolerance of violations of anti-slavery and human trafficking laws.

We also expect our suppliers to:

- Operate an ethical business policy which sets out how they govern their business and supply chains;
- Ensure robust data protection and IT procedures for their business, clients and supply chains; and
- Have the appropriate financial procedures in place to record all transactions in accordance with accepted accounting principles.

### Environment

We require our suppliers to comply with all environmental legislation and any standards and codes that may be specific to their industry.

We also expect our suppliers to:

- Assist us in achieving our targets as set out in our **Sustainability Policy** and **Sustainability Statement of Intent** and **Net Zero Carbon Pathway** documents on our website ([www.hiberniaREG.com](http://www.hiberniaREG.com));
- Take steps to minimise their impact on the environment through minimising energy and resource consumption, carbon footprint, and reliance on landfills;
- Obtain and maintain all necessary environmental permits, approvals and registrations;
- Comply with the relevant processes for suppliers as detailed in our certified ISO 14001 environmental management system;
- Review their own supply chains to ensure products and services are sourced from responsible sources and suppliers; and
- Report any instances of non-compliance to us as soon as possible so we can take timely action.

## Health and safety

We require our suppliers to provide a healthy and safe working environment for employees, contractors and other parties and to comply with relevant health and safety legislation and standards and codes specific to their industry.

We also expect our suppliers to:

- Comply with the relevant processes for suppliers as detailed in our certified ISO 45001 occupational health and safety management system;
- Comply with all health and safety best practices and our **Contractor Site Rules for Hibernia Buildings** whilst working at our properties or head office, and work with us to improve health and safety standards;
- Complete our **General Permit to Work** for all works carried out on Hibernia properties (and additional permits if required) and adhere to controls specified in the Permit and Risk Assessment Method Statement (RAMS);
- Ensure that employees/subcontractors have adequate health and safety information, training and competence before commencing work at any of our properties or head office;
- Ensure the welfare of their employees;
- Avoid using materials that may be harmful to health in use, manufacture or disposal;
- Have systems in place to prepare for and respond to accidents and emergency situations; and
- Report any instances of non-compliance to us as soon as possible so we can take timely action.

## Employment and Labour Practices

We require our suppliers to comply at all times with the relevant employee-based legislation.

In addition, we expect:

- Fair pay and working time practices ensuring compliance with national and local requirements;
- No illegal, forced or child labour, with employees free to terminate their employment in accordance with established laws, regulations and rules;
- Where possible, suppliers will seek to participate in appropriate workplace apprenticeship and business mentoring programmes compliant with applicable laws and regulations;
- Suppliers to respect the rights of employees regarding collective bargaining and the rights of freedom of association;
- Suppliers to have in place appropriate policies regarding recruitment, remuneration, equality and diversity to ensure fair and respectful treatment of all employees; and
- Suppliers to have appropriately documented grievance procedures which are clearly communicated and made available to all employees.

## Conflicts of Interest

We require our suppliers to avoid all conflicts of interest or circumstances which could be interpreted as conflicts of interest. The Supplier shall not enter into any business relationship with any director or employee of Hibernia without prior written notification from Hibernia. Any possible conflicts of interest should be reported to Hibernia without delay.

## Payment practices

Unless otherwise stated we aim to pay our suppliers for properly provided and charged invoices within 30 days or otherwise will do so in accordance with specified contract conditions.

We expect our suppliers to adopt similar payment practices throughout their supply chains.

## **Community**

We encourage our suppliers to:

- Develop positive relationships with our tenants and neighbours, especially on our developments and refurbishments;
- Minimise disruption from their activities within the local community;
- Source services and labour from the local community where possible and support apprenticeship schemes; and
- Support local community causes.

## **Privacy**

Suppliers will comply with all data protection legislation in relation to the use, processing and retention of personal data.

## **Reporting**

We require all suppliers to report any breaches in law or compliance in general, and those outlined in this Code in particular, to the relevant authorities.

Additionally, we require our suppliers to notify us and provide us with all details should they fail to comply with this Code.

Any incidents, accidents or near misses on Hibernia property must be notified at the time.

We encourage our suppliers to have a formal “whistle-blower” policy within their organisation in line with applicable laws and regulations.

## **Review**

We review our supplier code of conduct on a periodic basis. The last review was completed in August 2022.