



IRISH CONTINENTAL GROUP

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1.0 INTRODUCTION

Irish Continental Group (ICG) is committed to the highest standards of business and ethical behaviour including compliance with all applicable laws and regulations, as well as company policies, practices and procedures. Our supply chain partners play a key role in ensuring our business activities are carried out to meet the level of quality expected by ourselves and our stakeholders. As a Group, we strive to ensure our procurement processes are aligned with our values and policies across the areas of environment, ethics, human rights and health and safety. We will continually improve these processes through ongoing review and engagement with our various supply chain partners.

2.0 SCOPE

This policy applies to all suppliers of Irish Continental Group and its subsidiaries, third party contractors, agents or consultants representing or acting on behalf of ICG. Suppliers should also note other Group policies, available online at www.icg.ie relevant to key third parties and suppliers; ICG Human Rights Policy, ICG Modern Slavery and Human Trafficking Policy, ICG Anti-Bribery Policy, ICG Protected Disclosure Policy, ICG Equality, Diversity and Inclusion Policy.

3.0 POLICY PURPOSE

The purpose of this policy is to communicate our expectations to supply chain partners regarding their operations and conduct. These expectations are outlined below across the areas of environment, ethics, human rights and health and safety. We will ensure responsible procurement through dialogue and review of relevant supplier documents. In the event a supplier's practices deviate [] from our values and expectations, we reserve the right to discontinue the business relationship.

4.0 DEFINITIONS

Bribe: The giving of money, gifts or something of value to improperly influence the actions or business decisions of the recipient.

Conflict of interest: The term referring to the inherent nature and circumstances of a business relationship or activity which could result in a decision that is not made in the best interests of all parties involved.

Supplier: A company, organisation or individual providing goods or services, or acting or sourcing on behalf of ICG and its subsidiaries under a contract or other arrangement.

Modern Slavery: The term used within the Ireland and the UK and is defined within the Irish Criminal Law (Human Trafficking) Act 2013 and UK Modern Slavery Act 2015 respectively. The term is used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

Human Trafficking: Where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

5.0 ENVIRONMENT

We expect our suppliers to incorporate environmental considerations into their operations and work to minimise their environmental impacts. As part of our supplier due diligence processes and ongoing evaluation of procurement, we will seek evidence of an environmental management system and policy, in line with ISO 14001 or another relevant framework. At a minimum, we expect our suppliers to comply fully with all relevant environmental regulations and strive for continuous improvement in relation to environmental performance.

6.0 ETHICS

We expect our suppliers to uphold high ethical standards. Our suppliers should also refer to the ICG Anti-Bribery Policy which outlines our requirements for staff in terms of business courtesies they can give or accept. We strictly forbid any form of corruption, bribery or activity that might create the appearance of a bribe. Our suppliers must disclose to ICG any actual or potential conflicts of interest between both parties. Any known or suspected unethical activity or misconduct should be reported to ICG through our whistleblowing channels outlined in the ICG Protected Disclosure Policy. We also expect our partners to comply with any contractual obligations in relation to data protection and information security, and with all anti-corruption and anti-bribery laws and regulations. Our procurement processes will prioritise the selection of high-quality products and services ethically sourced, produced and delivered. We may request and obtain related supplier policies and documents.

7.0 HUMAN RIGHTS

Suppliers are expected to comply with the ICG Human Rights Policy and all published ICG policies concerning human rights issues. ICG respects internationally recognised human rights as established in the Universal Declaration on Human Rights and the International Labour Organisation's Core Conventions. We adopt a zero-tolerance approach to all forms of modern slavery and human trafficking and will tackle and eradicate any identified instances from our supply chain. We may seek assurances that our suppliers abide by our human rights policies or otherwise request and obtain related supplier policies and documents. We will remain alert to any potential risks within our supply chain. Violation of these policies and conventions can result in the termination of business activities.

8.0 HEALTH AND SAFETY

Safety is a key strategic pillar at ICG, and we expect our suppliers to provide a safe and healthy workplace for their staff and contractors. We expect our suppliers to have effective health and safety management systems in place and ensure there is a process for identifying, mitigating and monitoring related health and safety risks. We expect our suppliers to comply with all applicable health and safety laws and regulations. We may seek assurances that our suppliers have effective systems in place by requesting related supplier policies and documents. In the event of poor health and safety procedures or performance by a supplier, we reserve the right to discontinue the business relationship.

9.0 POLICY AMENDMENTS

ICG may amend or change this policy from time to time to reflect legislation and to ensure best practice.

Should you have further queries, or require clarification on any aspect of this policy, please contact the HR department.