

TLT LLP

Supplier Code of Conduct
October 2026

For what comes next
tlt.com

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Introduction by John Wood – Managing Partner

As a professional services business, we are used to meeting exacting regulatory obligations and we are instinctively client-centred, listening to our clients, anticipating the changes happening to their businesses and creating solutions that deliver what they need to prepare them for what comes next.

However, we are much more than that

- We are trusted advisers, and we work with the highest degree of honesty and integrity.
- We demonstrate our commitment to progression by thinking beyond legal to achieve the best outcome for our clients, the planet, and people.
- We are also future-ready, not just creating new capabilities in what we do and how we do it but also very conscious about the impacts we have.

Our values

They represent what is important to the firm and to the people who work at TLT. We believe that living our values will deliver the best outcomes for our clients, our communities and each other. Our values are to:

- Go beyond expectation
- Challenge convention
- Work side by side
- Be open and inclusive
- Drive sustainable action.

We want to ensure that all our suppliers share our values and beliefs and that they operate at our standards and in a responsible and sustainable manner. It is why we have created this code of conduct. It sets out the key social, ethical and sustainability values that we want our suppliers to abide by.

In it we have highlighted the issues that are important to us; from ensuring we support an inclusive and ethical supply chain through to ensuring individuals working in our supply chain work in a manner which is both safe and healthy.

We encourage you to share this Code of Conduct with those colleagues in your business, who are engaged in supplying goods and services to TLT so they also understand our values and beliefs and can contribute to our mutual success.

We are always keen to hear about how we can work better together, including ideas on areas relating to responsible business and sustainability. At the same time, if there is anything that could be improved, then we want to know so we can change it.

John Wood

Managing Partner

TLT – Supplier Code of Conduct

Our Supplier Code of Conduct sets out the expectations of our suppliers, their sub-contractors, and any subsidiaries. This applies to all suppliers working for or on behalf of TLT. All suppliers are expected to act in accordance with the code, ensuring it is communicated and enforced within their own organisation and supply chain.

TLT will carry out due diligence annually on all suppliers to ensure compliance with this Code of Conduct and with relevant laws and regulations, this will ensure that suppliers meet the expectations of TLT and its clients.

Any changes to this Code of Conduct will be notified to all suppliers and they must comply with any new requirements as soon as reasonably possible.

TLT will request copies of various supplier policies and other documentation in relation to this Code of Conduct. In some cases, we may request for evidence of compliance to this Code of Conduct which could include a request to audit your processes.

Any failure to comply with this code of conduct may constitute a breach of contract. 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. You must report any non-compliance to this code to Procurement@TLT.com immediately.

Anti-slavery/human rights

TLT prohibits the following practices in its supply chain, and expects its suppliers and sub-contractors to prohibit such practices:

- any restriction on the freedom of workers movement, association, or ability to terminate their employment
- any threat of violence harassment and intimidation
- use of worker-paid recruitment fees
- compulsory overtime
- child labour; and confiscation of workers' original identification documents
- poor working conditions

Suppliers must both comply with all applicable human rights and employment laws in the jurisdictions in which they work. This includes complying with the provisions of the Modern Slavery Act 2015. In addition, suppliers must have means of ensuring that the subcontractors in their supply chain also comply with all relevant MSA laws.

As a supplier you must

- have a clear policy to respect human rights, both of your own workforce but also those in your supply chain
- respect the human rights of your employees and to comply with all relevant legislation, regulations, and directives relating to human rights in the countries where you operate
- prohibit forced labour and human trafficking in your supply chain

- ensure that wages meet legally mandated minimums without unauthorised deductions and where possible, pay a living wage
- allow your employees to legally organise and join associations (such as trade unions)
- ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is at a manageable level
- have appropriate due diligence procedures to identify and manage human rights/anti-slavery within your own supply chain.
- provide accessible and confidential grievance mechanisms for all workers, including those in their supply chain, and ensure protection against retaliation for those who raise concerns.

Inclusion and diversity

We expect all our suppliers to treat everyone equally, with the same attention, courtesy, and respect regardless of their personal characteristics. Equality and Inclusion is a key priority at TLT. We are committed to the highest standards of professionalism, and we act fairly and with integrity in all our business dealings and relationships. TLT is committed to compliance with relevant equalities legislation including Equality Act 2010 and the Fair Employment & Treatment Order (NI), and to implementing and enforcing effective systems to promote Equality and Inclusion.

TLT is committed to eliminating discrimination and advancing equality of opportunity; it will not tolerate discrimination.

As a supplier you must

- encourage equality, diversity, and inclusion among their colleagues, and work to eliminate unlawful discrimination
- promote diversity within your own supply chains, including engaging with SMEs, minority-owned, and women-owned businesses
- treat everyone equally and with the same attention, courtesy, and respect irrespective of the following, perceived or otherwise: age, disability, gender reassignment, marriage or civil partnership, community background (Northern Ireland), pregnancy and maternity, political opinion (Northern Ireland), race (including colour, and ethnic or national origin), religion or belief, sex, sexual orientation, nationality, gender identity and expression, caring responsibility, socio-economic status
- carry out fair and transparent processes in relation to recruitment, selection, remuneration, training, promotion, discipline, and dismissal

Anti-Bullying and Anti-Harassment

We expect all our suppliers to work with us to provide a safe, respectful and inclusive working environment that is free from bullying, harassment, sexual harassment and victimisation. This means taking a zero-tolerance approach to all forms of bullying and harassment.

As a supplier you must:

- ensure your employees and workers are made aware of their obligation to comply with bullying and harassment legalisation when working with our colleagues.

- take all concerns or allegations of bullying, harassment, sexual harassment and victimisation raised with you about your employees or workers seriously;
- investigate and respond to concerns promptly, supporting any related investigation where required;
- take appropriate corrective action where concerns are upheld and ensure those who raise concerns are protected from retaliation.
- Encourage your employees and workers to report to us any concerns they experience or witness without delay.

Health and safety

We expect all our suppliers to minimise the number of occupational accidents and illnesses and operate in a manner which is safe for staff, visitors and third parties. Our suppliers are expected to ensure they comply with all relevant health and safety legislation.

As a supplier you must

- provide a safe work environment abiding by applicable legislation, respecting the health and wellbeing of your employees and any subcontractors
- have a written Health and Safety Policy
- ensure all staff and visitors are made aware of their obligations to take responsibility for health and safety
- where suppliers must attend TLT premises to carry out their services, they must adhere to all site rules and arrangements as outlined to them (you will be notified of these policies prior to attending any TLT office).

Anti-bribery and corruption

We expect all suppliers to act with honesty and excellent ethics, behaving responsibly and in our long-term interests and those of our clients. This means acting professionally, fairly and with integrity in all business dealings and relationships, taking a zero-tolerance approach to bribery and corruption.

As a supplier you must

- abide by anti-bribery laws and regulations and never offer any inducement or reward to gain any commercial, contractual, or regulatory advantage
- have a written Anti-bribery Policy or sign the TLT Anti Bribery and Corruption statement
- ensure employees do not make or accept facilitation payments or "kickbacks" of any kind
- never provide hospitality or gifts to TLT staff or partners where a procurement process is "live".

Information Security, Data Protection and Privacy

All suppliers must recognise the importance of Data Protection and information Security, to ensure that they impose the right controls to protect the information they hold for us and our clients. All suppliers must protect any data/information they access, receive or process on behalf of TLT. Suppliers must understand that compliance with Data Protection legislation are essential.

As a supplier you must apply sufficient controls to protect our data and that of our clients at each stage of the data lifecycle from data collection to the secure deletion of the data.

As a supplier you must

- abide by all laws and regulations relating to Information Security and Data Protection
- have a written Data Protection policy which is appropriate and relevant for your operations
- have processes in place along with technical and organisational controls to ensure compliance with the UK General Data Protection Regulation and Data Protection Act
- ensure your employees, sub-contractors and suppliers are made aware of their obligations in relation to Data Protection and that their compliance is monitored
- report any data breaches to us involving our data or our clients' data without undue delay and in accordance with any contract terms agreed between us which will normally be within 24 hours of being made aware of a breach

Protecting the environment

Environmental sustainability is a key priority for TLT. We are committed to the highest standards of professionalism and recognise our potential to impact the environment both positively and negatively, directly, and indirectly, through our activities and the services we provide. To support a reduction in our environmental impacts we have set the ambitious target to be net-zero by 2040, as verified by the Science Based Targets initiative (SBTi). We are working to reduce the environmental impact of our own business practices and activities, including reducing consumption of energy and other natural resources, pollution prevention and practicing sustainable procurement.

We also encourage our suppliers to join us in similar environmental efforts to implement an Environment Management System (EMS) as appropriate for their business and align with best practice activities including the following.

As a supplier you must

- minimise harm to the environment
- establish operational practices which minimise negative impact on the environment and deploy measures to prevent and reduce harm to the environment. Encourage and implement initiatives that provide an opportunity to enhance the environment
- track performance and report environmental improvements

- through data collection and tracking, reduce operational environmental impacts. Impacts could include resource consumption, air emissions (including those contributing to climate change), water consumption, management of hazardous materials, recycling and waste production. Disclose required information and provide to TLT, as appropriate, data to demonstrate environmental performance. As a minimum this includes all material Scope 1, 2 and 3 emissions data.

- set environmental targets and commitments

- maintain environmental policies, objectives and targets which as a minimum include commitments to identify, measure and reduce significant environmental impacts. Identify business risks associated with climate change and align with TLTs environmental agenda. We ask suppliers to align to our sustainability goals and set emissions reduction targets that are long term, embrace the Science Based Target methodology and support the transition to a net-zero emissions economy and resource efficient operations.

- report regulatory breaches

- disclose regulatory breaches and incidents involving the regulator, including outcomes of annual inspections, audit and or notices; together with the root cause and planned improvement actions to rectify and resolve the breach.

Ethical and responsible sourcing

We will actively source and procure products and services in an ethical, sustainable, and socially conscious way.

Environmental, social, and economic considerations are core to any decision making when selecting our suppliers.

We ensure that we engage suppliers from diverse businesses whilst minimising the impact on the wider environment, and with suppliers who treat their workers fairly and equally.

As a supplier you must

- ensure that all suppliers are dealt with fairly and ethically and in conjunction with this code of conduct

- ensure that Ethical and Responsible sourcing is taking place within your own supply chain and due diligence takes place regularly to ensure compliance with Ethical/Responsible sourcing and any risks within your own supply chain

- have equivalent policies or promote diversity within your own supply chain and where possible make purchases from a diverse business

- promote Equal Opportunities for all and embrace diversity within the workplace

- comply with all Human and Labour rights and adopt fair and ethical standards.

Business continuity

All suppliers must have appropriate plans in place to ensure continuity of supply to us. This will include having Disaster Recovery plans. This must be in place across your own supply chains.

When exiting from services, we expect suppliers to have arrangements in place to enable continuity of supply where services are being migrated and to address risks around the retention and/or destruction of sensitive data processed on our behalf.

Managing your own supply chain

We expect our suppliers to ensure that this Code of Conduct is communicated through your own supply chain.

We will always strive for continuous improvement to ensure full transparency within our supply chain.

As a supplier you must

- maintain an approved supplier list critical to your own supply chain
- perform due diligence on your supply chain including information security, data protection, business continuity, equality and diversity, modern slavery and sustainability and this should be carried out at least annually for your critical suppliers
- ensure there is full transparency within your own supply chain.