



Arqiva Group Limited

Registered number 05254001

Supplier Code of Conduct

For the year ended 30 June 2027

Supplier Code of Conduct

Message from our Chief Executive

At Arqiva, it is critical for us to work in an ethical, accountable, safe and sustainable way. This includes prioritising the wellbeing of our people alongside creating a positive impact on the environments we work in and the communities we support. This requires transparent and responsible business practices. Of course, we cannot do this alone. It's important that our suppliers share our values and standards and have the right policies, processes, and levels of compliance in place to meet those standards.

Our supplier code of conduct sets out our principles and what it means to work with Arqiva. Environmental Sustainability, Social Responsibility and Governance considerations are at the heart of how we work, and our supplier code of conduct is structured to reflect these key areas.

Therefore, we expect our suppliers to commit to our supplier code of conduct and that they in turn ensure that their partners, supply chain and subcontractors are doing the same.

Thank you for coming on the journey with us

Shuja Khan Date: 16 October 2024

CEO

Supplier Code of Conduct

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Introduction

In this supplier code of conduct ("**Code**"), a supplier ("**supplier**" or "**you**" or "**your**") refers to any individual or business which provides Arqiva Limited or any of its group companies ("**Arqiva**" or "**we**" or "**us**" or "**our**") with products and/or services. References to supplier, you or your includes all of your employees, agents, partners and subcontractors and you must have appropriate controls in place to ensure that you, and all personnel and parties within your supply chains comply with this Code.

This Code is not exhaustive but aims to provide an overview of areas which should be addressed and complied with. We require this Code to be incorporated in our agreement with you so it is vital that you understand and comply with it. The Code supplements, but does not supersede, any contractual agreement you may have with us. Where a contract contradicts this Code, the contract will prevail.

Without prejudice to any of our other rights, we reserve the right to conduct due diligence and assurance activities including, without limitation, auditing and/or requesting certification of your compliance with this Code and/or taking appropriate action if you are found to be non-compliant. We take adherence to the letter and spirit of this Code very seriously and a breach of the Code will be considered a material breach of our agreement with you and we may terminate our relationship with you. We also expect our suppliers to conduct their own assurance activities in relation to compliance.

We have an interest in protecting our business, resources, equipment and reputation. To achieve this, CCTV is installed at many operational sites and surveillance is carried out from time to time to ensure that our sites are secure and that

our policies (including without limitation those designed to protect the health, safety and well-being of our workforce) are complied with.

We may modify this Code from time to time. The updated Code will be published on www.arqiva.com and we expect you to check the website for updates.

We expect you to monitor compliance with this Code. If you feel that this Code or any of our other policies, processes or values are not being followed, you must let your Arqiva contact know immediately or contact our independently and confidentially managed reporting service, Risk Avert. See section 4 below for further details.

1. Environmental

i) *Environmental sustainability*

We are committed to protecting our people and the environment and we expect our suppliers to support us in the commitments set out in our Environmental Sustainability Policy available on www.arqiva.com. Therefore, our suppliers must at a minimum:

- Comply with Arqiva's Environmental Sustainability Policy and all other Safety, Health and Environment (SHE) policies available on www.arqiva.com and all relevant environmental legislation, regulations and codes of practice (including but not limited to those related to climate change, waste disposal, emissions, discharges and the handling of hazardous and toxic materials). Arqiva must be notified immediately when any violations are identified.
- Align to our environmental targets and work with us to achieve them including without limitation by demonstrating they have plans to become net zero by 2040 as well as phasing out single-use plastics, implementing sustainable sourcing practices and using renewable energy sources.
- Comply with any and all environmental reporting requirements and put in place systems to track and report the carbon emissions of their business and supply chain. Any emissions, waste and other environmental data must also be shared with Arqiva to support our reporting and tracking of environmental initiatives.
- Ensure supplied goods are designed, manufactured, operated and maintained in ways that minimise pollution, emissions and waste generated during their lifecycle and enable end of life reuse or recycling of component materials whenever economically feasible to minimise waste through circular economy principles.
- Be looking for ways to understand the environmental risks connected to their supply to us and to continually improve their environmental performance and be able to provide environmental performance details and future plans to mitigate those risks.

ii) *Safe and legal products and services*

We are committed to providing safe and legally compliant products and services which are ethically sourced and we expect our suppliers to do the same. Our suppliers must:

- Ensure that products supplied to us comply with all appropriate legal requirements and /or standards and where required, bear a CE (European conformity) or UKCA (UK Conformity Assessed) mark (or other product safety mark as necessary) and the guidance at <https://www.gov.uk/guidance/using-the-ukca-marking>.
- Ensure that equipment does not contain substances listed in the Restriction of Hazardous Substances Regulations (and any other applicable laws restricting use of hazardous materials).
- Have policies and procedures in place to comply with EU Conflict Minerals Regulation 2017/821 and any and all other applicable laws or regulations.
- Carry out due diligence around the sourcing of elements including any tin, tantalum, tungsten and gold used in materials or products supplied to us to make sure they comply with applicable laws and regulations.

2. Social

Arqiva supports the International Labour Organization's Declaration on Fundamental Principles and Rights at Work namely: i) freedom of association and the effective recognition of the right to collective bargaining; ii) the elimination of all forms of forced or compulsory labour; iii) the effective abolition of child labour; iv) the elimination of discrimination in respect of employment and occupation; and v) a safe and healthy working environment.

i) *Freedom of Association*

Our suppliers must at a minimum:

- Respect and not interfere with the rights of employees to form or join trade unions or similar representative bodies and to engage in collective bargaining.
- Allow open communication and direct engagement between its employees and management in building employee relations and for the resolution of any issues and not prevent the development of these mechanisms.
- Ensure that employees are not discriminated against or be treated unfavourably or differently because of their relation to a trade union.

ii) No forced or compulsory labour and no child labour

Arqiva is committed to upholding the International Labour Organization (ILO) Convention 138, which is aimed at eliminating of all forms of forced or compulsory labour, effectively abolishing child labour and progressively raising the minimum age for admission to employment or work. Our suppliers must:

- Uphold ILO Convention 138.
- Strictly prohibit the use of forced or compulsory labour or child labour and ensure that the employment of workers below the age of 18 only occurs in non-hazardous work and when young workers are above a country's legal age for employment and any such employment complies with all applicable laws. Hazardous work includes (but is not limited to) working at night, working excessive overtime, or being exposed to chemicals, pesticides, machines or tools, dust or excessive cold, heat or noise.
- Align to an ILO compliant standard working week of 48 hours for their workers, with no overtime of more than 20 hours and no forced overtime.
- Implement robust age verification checks to ensure the expectations above are met.

iii) Elimination of discrimination in respect of employment

We are committed to promoting a safe, supportive and co-operative environment where people are treated with respect valuing the privacy and rights of individuals.

Our suppliers must:

- Commit to diversity and inclusion and promote equal opportunities for all employees irrespective of age, disability, gender, marital or partnership status, pregnancy or maternity, race (including the traveller community), national origin, religion or belief, sex or sexual orientation, gender, gender identity or expression, age, disability, marital status, pregnancy, maternity, socio-economic background, political opinion, union membership or political affiliation or any other characteristic other than a person's ability to perform the role subject to any accommodations required or permitted by law.
- Have policies that meet or exceed the requirements of all relevant equalities legislation including without limitation the Equality Act 2010.
- Provide diversity data (including diversity and gender pay gap data) to Arqiva to support our tracking and reporting, as required.
- Train their employees, officers and subcontractors on diversity and inclusion, bias and discrimination, including what it is and how to prevent it.
- Compensate employees fairly and equally, without discrimination. This includes paying appropriate wages (see below)] local living, prohibiting unfair deductions, taking action to address gender or diversity pay gaps and meeting all legal or contractual obligations.
- In the UK, ensure eligible employees and freelancers are paid the real Living Wage or real London Living Wage (if living in London) as set by the Living Wage Foundation.
- Ensure non-employees such as interns, trainees, and anyone who has done work experience for more than 20 days are paid at least the minimum wage.

iv) Safe and healthy working environment

Ensuring a safe and healthy working environment is of paramount importance to us.

Suppliers must:

- Provide a healthy and safe working environment in accordance with applicable laws and which meets both general and any industry-specific principles of health and safety risk prevention. General principles include identifying, minimising and preventing risks and hazards, using competent and trained people with specialist training and/or relevant certifications as required, providing and maintaining safe equipment and tools, including without limitation personal protective equipment.
- When accessing Arqiva's premises, comply with our reasonable instructions, requirements, procedures and policies as communicated from time to time.
- Ensure that all its employees are competent to carry out all aspects of their role in accordance with applicable health and safety requirements. This shall include the nomination and training of persons at an appropriate level, who are responsible for discharging Supplier's health and safety obligations.
- Ensure facilities and amenities, including employee accommodation where provided by Supplier, are hygienic, safe and meet the basic needs of employees.
- Put in place mechanisms to ensure that health and safety obligations are communicated to all applicable workers and have systems and training to prepare for and respond to accidents, health problems and foreseeable emergency situations. Supplier shall promote a 'don't walk by' culture and shall have means and procedures in place for recording, investigating and implementing learning points from incidents, accidents and/or emergency situations and/or high potential near misses.
- Report to Arqiva without delay any major or high potential health and safety incident, any reportable or potential reportable accident, disease or dangerous occurrence and/or reportable or potentially serious environmental incidents connected to products and/or services being provided to Arqiva. Keep Arqiva updated as to the progress of any investigations and learnings around the same together with actions taken to prevent recurrence.
- Provide a workplace free of harassment, bullying, harsh and inhumane treatment, including without limitation mental, physical, sexual or verbal abuse, corporal punishment and without threat of any such treatment or any forms of intimidation.
- Have written disciplinary procedures established and explained to employees in terms that are clear and understandable to them. Ensure disciplinary and/or performance management actions are taken, recorded and explained to employees.
- Provide training on harassment, bullying and sexual harassment, including what it is and how to address it.
- Ensure working hours do not exceed the maximum set by local law and, as far as possible, promote compliance with the ILO Conventions on Hours of Work.
- Arqiva has a comprehensive wellbeing programme which is operated across all its delivery routes. It is expected that the contractor shall set high standards for wellbeing in all aspects of the Services and ensure these are always maintained, and be able to provide evidence of this if requested.
- Have in place measures to promote and support the development and investment in skills and capabilities to support the delivery of products and / or services to Arqiva.

3. Governance

Arqiva is committed to working in an ethical, accountable and sustainable way prioritising transparent and responsible business practices and governance is at the heart of achieving this goal.

i) Compliance with Laws

In addition to complying with the standards and policies set out in this Code, you must comply with all applicable UK laws and regulations (and if applicable, the laws and regulations of any other jurisdiction where you operate) including but not limited to the laws and regulations relating to issues addressed in this Code. If there is a conflict between any applicable laws or regulations, the provisions of a contract with Arqiva and/or the provisions of this Code, you will meet the most stringent standard.

ii) Policies

Supplier shall have in place internal policies and documentation which support compliance with this Code. Supplier shall provide copies of the same to Arqiva on request and Arqiva may conduct due diligence and assurance activities on compliance with this Code including without limitation auditing and/or requesting certification of compliance and/or take appropriate action in the event of non-compliance.

iii) Anti-Bribery, Modern Slavery, Fraud, Money Laundering, Terrorist Financing, and Tax Evasion

Arqiva is committed to acting honestly and with integrity and we expect the same of our suppliers. We have a zero tolerance policy towards fraudulent activities, bribery and corruption, money laundering, terrorist financing, modern slavery and tax evasion and are committed to having in place systems and processes to counter the same throughout our supply chain.

Suppliers must:

- Always be honest, fair and truthful in all of their dealings and never attempt to deceive or mislead others.
- Comply with all applicable anti-bribery and corruption legislation including without limitation the UK Bribery Act 2010 and with any Arqiva's policies available at www.arqiva.com. Suppliers must not tolerate or enter into any form of bribery.
- Not give, promise, receive or request any bribes (financial or other advantage including gifts, entertainment, hospitality, transportation, sponsorship, charitable donation, facilitation payments and/or other benefit to improperly influence the performance of a relevant function or activity), including but not limited to in relation to any public official.
- Have an anti-bribery policy that sets out the principle of zero tolerance to any form of bribery or corruption within their organisation.
- Ensure its employees, contractors and sub-contractors are aware of its anti-bribery policy and how to comply with its requirements.
- Comply with all applicable laws on fraud (including without limitation the UK Economic Crime and Corporate Transparency Act 2023), modern slavery (including without limitation the Modern Slavery Act 2015), tax evasion (including without limitation the UK Criminal Finances Act 2017) and money laundering and/or terrorist financing (including without limitation the UK Proceeds of Crime Act 2002 and Terrorism Act 2000) and must not do or omit to do anything likely to cause us, our customers or any party within our supply chain to be in breach of any of such applicable laws or to commit any offences under any of such applicable laws (and, if the supplier is outside the United Kingdom, which would constitute such an offence if such conduct had been carried out in the United Kingdom).
- Maintain an effective compliance programme designed to ensure compliance with applicable laws on fraud, modern slavery, tax evasion, money laundering and terrorism financing and prevent the facilitation of any of them, including the monitoring of compliance and detection of violations.

iv) Sanctions

Arqiva is committed to comply with all sanctions such as economic sanctions, international sanctions, embargo, and diplomatic sanctions.

Suppliers must not provide to, or procure products or services from, or do business with, countries or entities which are sanctioned by any of the United Kingdom, the European Union, the United Nations, any European Union member state or any United States government entity.

v) Competition Compliance

Arqiva is committed to competing fairly and operating in compliance with all applicable competition laws, rules and regulations (including without limitation all its regulatory undertakings).

Suppliers must:

- Comply with all applicable competition laws, rules and regulations including but not limited to those relating to teaming and information sharing with competitors, price fixing and/or rigging bids.
- Implement measures (including without limitation training of employees and implementing monitoring and assurance processes) to ensure that anti-competitive behaviour in its business is prohibited.
- Comply with Arqiva's reasonable instructions to ensure that Arqiva complies with its regulatory undertakings.

vi) Security

The security of our intellectual property, data and systems is critical to our business and, as a Critical National Infrastructure service provider, Arqiva is committed to ensuring the security of its information and the information it handles.

Suppliers must:

- Have appropriate governance in place to identify and mitigate security risks (including both logical and physical security risks).
- Maintain and apply best practice security measures (including both logical and physical security measures) to safeguard our data, confidential information, trade secrets and intellectual property from unauthorised access or disclosure, unlawful destruction, loss, alteration or other misuse and to protect the integrity and availability of the products and/or services being provided.
- Ensure that our data is only used for its intended purposes and nothing else.
- Educate their employees and supply chain on security matters and have in place monitoring and assurance processes to ensure that all breaches of security, actual or suspected, are reported and investigated.
- Comply with all applicable data protection and privacy laws (including without limitation UK GDPR, the Data Protection Act 2018 & Privacy and Electronic Communications Regulations 2003) to respect and protect personal data including that of our customers, contractors and colleagues.
- If they are acting as processor of Arqiva's data, comply with all instructions of Arqiva and any contractual obligations agreed with Arqiva.
- If accessing our systems, comply with our code of connection or other policies which we may require.
- Immediately notify Arqiva if there is any data breach or security incident or anything which affects the confidentiality, integrity or availability of our commercial information and/or any personal data (e.g. unlawful destruction, loss, alteration, unauthorised disclosure or access).

vii) Business Continuity

As a Critical National Infrastructure service provider, business continuity and resilience is critical to Arqiva's business. Suppliers must at a minimum:

- Develop and implement appropriate business continuity policy and plans, covering all operations and services that support Arqiva, to minimise the impact of any disruption or disaster. Such policy and plans shall include without limitation identifying risks, hazards and threats that may disrupt the operations of the business through risk management and strategic direction for planning for and responding to incidents that could impact service operations.
- Provide evidence of business continuity policy and plans as well as demonstrate evidence of testing and/or operation of the same when requested.
- Have in place processes to review the effectiveness of any business continuity policies and plans on a regular (and at least annual) basis and engage in measures to support continuous improvement of organisational resilience ensuring an appropriate and timely response to recovery.
- Align with the latest ISO 22301 Business Continuity Management System standard and, if they are accredited, provide evidence of their certificate from a United Kingdom Accreditation Service (UKAS) recognised provider (or equivalent accreditation service provider in other jurisdictions than the UK).
- If the suppliers have been made aware by Arqiva that they will be providing, supporting and/or maintaining critical services to Arqiva's services, sites, operations and/or running of its business, suppliers will ensure priority is given to Arqiva for such critical services.

viii) Quality

Arqiva strives to achieve quality across its business and in delivering its products and services. Suppliers must at a minimum:

- Provide the products and/or perform the services in a timely, competent, professional manner with all due care, skill and diligence in accordance with best practice in the Supplier's industry, profession or trade i.e. with the exercise of skill, care, diligence, judgement, prudence and foresight and the use of practices, controls, systems, technologies and processes that would be expected from a skilled experienced and market leading service supplier that is an expert in performing the same or similar obligations, undertaking, activity or service, and using and applying skilled resources with the requisite level of expertise.
- Ensure that the products and/or services, and all materials, standards and techniques used in providing them, are of satisfactory quality and fit for any purpose expressly or implicitly made known to the Supplier by Arqiva and shall be free from defects in installation, design, material, workmanship and performance.
 - Apply quality management principles of customer focus, leadership, engagement of people, process approach, improvement, evidence-based decision making, and relationship management.

- Check and confirm to Arqiva at the start of the supply agreement that they have all relevant requirements, documentation and specifications from Arqiva that they will need for the performance of their obligations.
- Comply with the latest ISO 9001 Quality Management System and provide evidence of latest ISO 9001 certificate (if applicable) and any other documentation related to Quality Management System in the event that:
 - o the products and services to be provided by the supplier are intended for incorporation into Arqiva's own products and services;
 - o the products and services are provided directly by the supplier to a customer of Arqiva; and/or
 - o any Arqiva process, or part of a process, is provided by a supplier at the request of Arqiva.

ix) Supply chain management

The supplier shall ensure that there are suitable selection, ongoing monitoring and review systems in place to satisfy itself that all personnel and parties in its supply chain are able to comply with this Code.

x) Conflicts of interest

We expect our suppliers to avoid any obvious or implicit conflicts of interest (between their interests and those of Arqiva) and immediately disclose any known or potential conflicts of interest to our Procurement team.

4. Whistleblowing / Speaking Up

Arqiva is committed to ensuring that all our employees, suppliers and sub-contractors have access to independently managed confidential whistle-blowing or speaking up services should they feel that our policies, processes or values including those within this Code are not being followed, or someone is acting unfairly or dishonestly.

Suppliers must:

- Have in place whistleblowing / speaking up facilities throughout their supply chain and promote the importance of speaking up across their organisation and to any of their personnel working on behalf or for Arqiva so that their personnel have access to and are aware of such facilities.
- Report any instances of illegal or unethical behaviour or breaches of this Code to us or using the Whistle-blower contact details below.
- Not retaliate or take disciplinary action against any personnel who have in good faith reported breaches of this Code or questionable behaviour or who have sought advice regarding this Code.

Whistleblowing Contact details:

Should you feel that our policies, processes or values are not being followed, or someone is acting unfairly or dishonestly, please let us know by contacting our independently and confidentially managed reporting service, Risk Avert (<https://riskavert.co.uk/account/arqiva>).

ARQIVA

Arqiva Group Limited

Registered number 05254001

Annual Report and Financial Statements

For the year ended 30 June 2025