



## Supply Chain Code of Conduct

### Northern Trains Limited Code of Conduct for Business Partners

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**Purpose of the NTL Supply Chain Code of Conduct** In this Northern Trains Limited (NTL) Code of Conduct for Business Partners, NTL has defined its requirements and principles for its business dealings with its business partners, in particular those relating to compliance with ethical standards, applicable laws as well as integrity. Business partners are all suppliers that supply goods and services to NTL.

#### General Principles

NTL is committed to sustainability and passionate about making a difference to the communities we serve. Commercial success and socially responsible actions do not contradict each other - in fact, they are interdependent. We see sustainable and responsible conduct as an important foundation in relation to business dealings with our business partners.

#### Corporate Social Responsibility of our Business Partners

NTL considers social responsibility is a key factor for the long-term success of our company and consequently an indispensable element of our value-driven corporate management. We therefore expect our business partners to align their conduct with the following principles:

#### Human Rights

Our business partners respect commonly accepted human rights.

#### Slavery and Human Trafficking

NTL supports the objectives of the Modern Slavery Act 2015 of eliminating slavery and human trafficking and expects that its business partners comply with the same principles and all applicable laws to reject any force labor or trafficking.

#### Equal Opportunities

Our business partners promote diversity within their organisations and do not tolerate any discrimination with respect to hiring and employment of employees.

#### Safety

Putting the safety of people first is at the core of our business partners' values. Together with their employees our business partners provide both for a safe working environment and safety related qualifications as well as for the safety of their products and services.

#### Occupational Health and Safety

By means of preventative occupational safety measures and good working conditions our business partners seek to avert dangers to individuals and to promote and preserve the health of their employees. Our business partners ensure they comply with all applicable laws and regulations. Their employees' safety is a central requirement of our business partners' corporate activities.

#### Environmental Protection

Our business partners comply with all applicable environmental legislation and standards. Our business partners employ best available techniques to ensure that our natural environment is protected and where possible enhanced, and resources including materials and energy are conserved.

NTL aim to be Net Zero in line with UK Government objectives and the Paris Agreement, business partners are expected to align to this approach and take the necessary steps to decarbonise their offer of products and services to Northern

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**Labour and Employment Conditions**      Applicable laws and agreements with their social partners are respected by our business partners. Our business partners remunerate their employees adequately.

**Data Protection**      Our business partners comply with all applicable laws for the protection of personal data, particularly of employees, business partners and customers.

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**Anti-Corruption**

NTL does not tolerate any form of corruption, canvassing or collusion and other unfair business practices. Transparency and openness are essential requirements for NTL.

**Corruption**      Our business partners should not tolerate any form of corruption and bribery and should comply with all applicable laws.

**Consultants / Agents / Brokers**      Any remuneration paid to consultants, agents, brokers and/or other intermediaries must not serve to provide business partners, customers and other third parties with unfair advantages.

**Avoidance of Conflicts of Interest**      Our business partners avoid conflicts of interest that may lead to corruption risks.

**Invitations and Gifts**      In connection with their business activities for NTL, our business partners accept invitations only or grant invitations only if they are appropriate, not in anticipation of any improper benefits in return or any other preferential treatment.

**Behavior towards Public Officials**      Our business partners do not tolerate any form of unlawful tangible and intangible benefits (including their offering) to public officials or persons comparable to these (irrespective of whether these are made directly or indirectly through third parties).

**Political Parties**      Any unlawful tangible and intangible benefits of any kind to political parties, their representatives or to holders of public offices or candidates for political offices will also not be tolerated by our business partners.

**Donations / Sponsoring**      Donations are only made on a voluntary basis by our business partners and not in anticipation of any consideration in return. Sponsoring of individuals, groups or organisations will not be used in order to obtain unlawful business advantages.

**Money Laundering**      Our business partners take appropriate measures to prevent money laundering in their organisations.

**Corporate Criminal Offence**      Our business partners take appropriate measures to comply with the Criminal Finances act and have proactive controls in place to ensure they or their partners do not facilitate tax evasion.

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**Conduct of our Business Partners in Competition**

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NTL strives to always act as a fair and responsible market participant and expects the same from its business partners.

**Competition Laws**

Our business partners comply with all relevant competition laws. In particular, they do not make agreements and arrangements that influence prices, conditions, strategies or customer relations, especially regarding participations in tender procedures.

**Export- and Import Controls / Combating Terrorism**

Our business partners observe compliance with all applicable laws regarding the import and export of goods, services, and information as well as the laws on combating international terrorism.

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**Compliance with the NTL Supply Chain code of conduct**

**Compliance**

As a business partner to NTL you shall ensure that the principles set out in this NTL *Supply Chain code of conduct* are complied with.

**Reports to the NTL Group**

Our business partners use the opportunity to make reports on crimes that were committed in the course of their business activities for NTL and which may have effects on NTL through the existing reporting systems of NTL.

**Protection of Whistleblowers**

Our business partners do not tolerate any discrimination against persons who report violations of the principles set out in this NTL *Supply Chain Code of Conduct*.

**Supply Chain**

Our business partners choose their suppliers, which they retain in relation to their business activities for NTL, diligently, communicate the principles set out in this *NTL Supply Chain Code of Conduct* or equivalent principles to them and promote compliance of their suppliers with these principles.

**Where to find further Information**

In case of doubt or questions, please contact your nominated contact person at NTL.

This Policy will be used as the foundation for our relationships with business partners. We will include this Policy in our tenders, and when offering and awarding business to suppliers. This Policy will be integrated into supplier contracts.

We will engage with our suppliers to encourage continuous improvement in performance and measure progress. Suppliers' performance against the principles of this Policy will be reviewed at regularly scheduled business meetings, complemented by supply chain risk assessments.

We will monitor compliance with this Policy and reserve the right to visit suppliers' and subcontractors' facilities to audit performance. Further, we reserve the right to monitor any tier of our supply chain. Equally, and where necessary, we will work with suppliers to create a corrective action plan for achieving compliance in clearly defined and reasonable timeframes. If non-compliance is deemed serious, we reserve the right to apply sanctions, which can include immediate termination of our business relationship as further set out in relevant contracts.

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