Supplier Charter

whistl

We want to work with suppliers which share our values and help us deliver on our promises and commitments.

Introduction from our Procurement & Property Director

Whistl is a unique business where we strive to do a great job, with "can do" people. We believe our people make the difference and the right behaviours and actions are embedded in our culture. This isn't just internal; it extends to the business relationships we have with our suppliers and customers. We invest in these relationships as we believe they make a difference to the service we provide to our customers and importantly, they have a significant role to play in managing the impact we have on the environments and societies in which we operate.

We want to work with suppliers which share our values and help us deliver on our promises and commitments. We believe this is best achieved through the sharing of practice and information. Together we can achieve higher Environmental, Social & Governance (ESG) standards in our supply chain.

This Supplier Charter sets out how we will conduct ourselves and what we expect of our suppliers in return. These are the principles of our supplier relationships. This document does not supersede any contractual arrangements, and the terms of our contract with a supplier will always govern the situation and determine the rights and obligations of each party. However, we believe that the principles are a vital statement of how we want to do business.

Our supply chain is diverse and the relationships vary according to the value and importance to both parties. As a business we strive to be easy people to work with, straight forward and honest.

With this comes practicality. Therefore, we recognise that one size doesn't fit all and we don't want to create barriers that restrict, for example, SME's from working with us. However, we have to be clear on, and will not compromise on, maintaining minimum standards. Our commitment is that these are proportionate.

To put this into context we require all suppliers to:

- ***Adhere to applicable laws and regulations;***
- ***Behave ethically;***
- ***Provide safe and secure working conditions for their employees; and ensure the same in their supply chains;***
- ***Treat their employees fairly, providing equal opportunities, being inclusive and encouraging diversity; and***
- ***Minimise their impact on the environment.***

In today's society, cyber threats are a material risk for business and individuals. Therefore, those suppliers who manage personal data or provide IT services, must comply with applicable data protection laws and maintain the highest standards of information security.

Whistl has a responsibility to its suppliers. Therefore, when problems arise with a supplier's performance or behaviour, we will work with the company concerned to help them meet our requirements. Escalations will be dealt with in line with our contractual requirements but always in the spirit of ensuring the right outcome for our stakeholders.

We believe that, in working together, we can have a stronger impact and can make more of a difference.

Gareth Hughes
Procurement & Property Director

Our Promise & Business Values

We're on a mission
To grow by doing a great job, with can-do people working efficiently to deliver exceptional service.

What we believe
Every supplier should have a voice: every supplier should have an opportunity.

We aim to do things differently in the markets we operate in; providing real choice for customers and consumers.

We also believe all colleagues should be given an opportunity; trained and developed to seize them.

Our Promise

Quality first
Reliability, dependability and a quality service – central to everything we do for you.

Easy to work with
We work hard at making sure it's easy for you to use us, to get hold of us and to get on with us.

Thinking of you
Before we think, speak or act, we put ourselves in your shoes and do what's right for you and your business.

The human touch
Expect happy and helpful, willing and able. Can-do is in our DNA.

The right thing
We're open and honest, straight and clear – doing the right thing.

Our Practices

Think as part of the team
All that stuff about teamwork is true – working together works best. That applies to all of us here at Whistl, whether it's cross-divisional collaboration within the Group, or in external relationships with suppliers or delivery partners. We are all interconnected, we share common goals and we get there together.

Act with a can-do attitude
At Whistl, we'll always try to find a way. We never say no if there's a chance of yes, and we believe challenges are there to be overcome. We think – and act – positively.

Do the right thing
For our people, that means working as part of a team, supporting colleagues, respecting them and sharing knowledge.

As a company, internally it means looking after our people, recognising their contribution, and helping them progress.

While with customers and suppliers, it means everything from fair pricing to transparency, straight-talking to straight-dealing.

Our Commitments

This Supplier Charter sets out the principles of how we will work and how we expect our suppliers to work. We believe in being clear, open and transparent. We believe this is the platform for effective and high performing relationships. This Supplier Charter gives us the opportunity to stress the importance of communicating how we want to do business, and our preferred approach to working with our suppliers.

We will meet the highest standards of business conduct and expect the same from our suppliers. We will lead by example and "Do the Right Thing" to ensure that all participants in our supply chains are beyond reproach.

If our suppliers are ever concerned or believe that any of our employees are not meeting the high standards of professionalism that we set ourselves they should report it to our Whistleblowing hotline on 0800 989 0169. The service is confidential, you don't have to leave your details, but we urge you to use it if you are concerned about a breach of the law, regulations or any Whistl policy.

We will meet our contractual obligations and will act to ensure we pay our suppliers in line with agreed terms.

We believe in clarity and being easy people to do business with. A lack of clarity causes confusion and frustration so we will always endeavour to provide clear and concise information to our suppliers.

We like to keep things simple, so as much as we welcome innovation, new ideas and efficiencies, we also believe in using existing recognised standards whenever possible.

When things go wrong or suppliers are not successful in winning additional business, we will provide debriefing and constructive feedback when requested, disclosing what we can within the constraints of preserving confidentiality and encouraging competition.

We are a business that has grown, so we believe in and support entrepreneurs and small and medium enterprises (SME's). Where possible and appropriate, we will promote and encourage working with (SME's).

We have some great suppliers and we want them to thrive and succeed. Therefore, we reward good supplier performance through repeat business and growth opportunities.

CONFIDENTIAL HOTLINE **0800 989 0169**

Ethics & Compliance

Ethics

Whistl expects the highest standards of ethical conduct in all its business interactions, complying with the law and not engaging in corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage. Our Anti-bribery and Corruption Policy details how we operate transparently and with vigilance to deter and support the detection and investigation of bribery and corruption and how we protect our business, our people and our customers from being victims of financial crime.

Whistl recognises the need to have fraud prevention policies, procedures and reporting mechanisms to protect our business and the integrity of our financial reporting, to comply with all applicable laws and regulations in the countries it operates. The primary objectives of this policy is to ensure: fraud or suspected fraud is promptly reported and effectively investigated. Losses caused by fraud are prevented or recovered. Consistent and effective action is taken against those persons proven to have committed fraud. No employee or organisation is charged with fraud until and unless conclusive evidence of such wrongdoing has been established through a robust investigative process.

Whistl staff cannot accept cash, goods, services, hospitality or any gift that could be construed as an inducement or a bribe. For guidance the following points should be observed:

- ***Token business items (e.g. promotional give-aways or stationery) with a nominal value (less than £10) can be accepted;***
- ***Corporate hospitality and networking opportunities can be accepted if they are offered by a long-standing supplier under a group procurement contract and could reasonably be reciprocated;***
- ***No items or hospitality can be accepted if:***
  - *The supplier's contract is under review or will be under review in the three months following the offer or event; or*
  - *The supplier is taking part in a tender or selection process to supply goods or services to Whistl three months following the offer or event.*
- ***All offers, whether accepted or declined, should always be declared in the Gift & Hospitality Log by sending the details to procurement@whistl.co.uk***

What does this mean for our suppliers?

- ***Suppliers should maintain high ethical standards and good governance whilst ensuring regulatory compliance;***
- ***Suppliers must apply the same approach to ethics throughout their supply chain;***
- ***Suppliers must respond to any due diligence requests from Whistl in a timely manner;***
- ***Suppliers shall not offer, give or accept anything of value that may be viewed as, or has the effect of, improperly influencing business decisions. (If you are uncertain of this, contact the Procurement & Property Director);***
- ***Suppliers must make Whistl aware of any potential conflicts of interest as soon as they are known at procurement@whistl.co.uk***
- ***Suppliers should use the Whistleblowing Hotline to raise genuine concerns about potential misconduct in the course of doing business.***

Our Whistleblowing Hotline **(0800 989 0169)** provides anyone who works with us with a secure, confidential way to report genuine concerns.

Human Rights & Modern Slavery

Whistl is committed to eliminating any form of modern slavery.

We are committed to improving our practices to combat slavery and human trafficking by helping protect the most vulnerable and to prevent the violation of human rights. We want to ensure there is transparency in our own business and in our approach to tackling modern day slavery throughout our supply chain.

In order to do this, we have...

A Modern Slavery Committee

Our committee meets at least twice per year and is chaired by a HR representative with representatives from across Whistl (Legal, Compliance, Marketing and Procurement). The committee help develop continuous improvement plans and to ensure progress is regularly reported against these plans and relevant KPIs to the Board of Directors.

Modern Slavery Policy and Statement

Our Modern Slavery Policy is available, in addition to this, we produce an annual Modern Slavery Statement which is published on our **website** and also on the Government registry. This statement provides an update on what we have been doing over the course of the year to ensure we are fulfilling our obligations and doing everything in our power to eliminate any risk.

Training and Awareness

In 2020 we also launched a modern slavery learning module, as part of the Business Ethics and Whistleblowing compliance module. The module has been introduced to help raise awareness across the business and all Whistl Group employees are expected to complete and pass the module annually.

What does this mean for our suppliers?

- *Suppliers must purchase goods and services from providers who comply with Human Rights and Modern Slavery laws and standards;*
- *Suppliers must comply with all applicable laws and standards;*
- *Suppliers must comply with the Whistl Modern Slavery Policy and apply the same to their supply chain;*
- *Suppliers must respond to any due diligence requests from Whistl in a timely manner;*
- *Suppliers must not hold an individual or group in slavery or servitude. This includes any form of physical or mental coercion;*
- *Suppliers must not use any form of involuntary labour including forced, compulsory, prison or debt-bonded labour;*
- *Suppliers must not traffic individuals or groups for the purpose of labour exploitation;*
- *Suppliers must never use or support practices that inhibit the development of children;*
- *Suppliers must ensure compensation paid to employees complies with all national regulations on working hours, wages and benefits; and*
- *Suppliers must raise awareness of the signs or types of acts that may constitute bullying, abusive or illegal behaviour and ensure they have appropriate methods for reporting and investigating all reported concerns.*

Environment

Whistl expects its suppliers to support and promote environmental protection and to comply with local environmental laws and regulations. Whistl expects its suppliers to promote greater environmental responsibility and support us in the use of goods and services which help minimise our environmental impact, as well as better managing and utilising resources such as energy, paper, water and waste. We will assess suppliers on their contribution to the above at the point of selection and on an ongoing basis.

What does this mean for our suppliers?

- *Suppliers must comply with all applicable laws and standards;*
- *Suppliers must ensure they have a process to assess the impacts of climate change on their company;*
- *Suppliers must have a process in place to measure the impact they have on the environment in providing goods and services to Whistl and their activities in general;*
- *Suppliers must have a plan to proactively seek to reduce the impact they have on the environment;*
- *Suppliers must purchase products and services that are responsibly and ethically sourced;*
- *Suppliers must work with us to provide sustainable solutions that reduce carbon and other green house gas emissions, where practicable; and*
- *Suppliers should aim to reduce consumption and efficiently use goods, materials and natural resources.*

> *Suppliers must have a process in place to measure the impact they have on the environment in providing goods and services to Whistl and their activities in general*

Equality, Diversity & Inclusion (ED&I)

An inclusive company enables anyone, regardless of their identity, background and circumstance, to thrive at work and have equal access to jobs that positively benefit them.

At Whistl we believe we have a key part to play in tackling inequality, encouraging diversity and creating an inclusive workplace culture.

We have made a commitment to take ownership in promoting ED&I and act as role models. We strongly believe in the principles of:

- ***No Barriers*** *– Everyone should have the same opportunities regardless of their gender, ethnic and national origin, race, colour, religion, age, disability, sexual orientation and identity.*
- ***Be You –*** *This is a place where you can be you and make the most of your talents. Being you enables us all to be better. Being you is what makes us a great team.*

At Whistl, we have a dedicated ED&I Forum that consists of ED&I allies from across all our sites and ED&I sponsors from the Senior Leadership Team: Alistair Cochrane (CEO), Gareth Hughes (Procurement & Property Director) and Melanie Darvall (Director of Marketing and Communications), who all bring together our ED&I Charter. This Charter demonstrates our commitment to take ownership for our business areas in promoting ED&I and act as role models within Whistl.

As part of our EDI Charter, we have publicly committed to the below initiatives:

What does this mean for our suppliers?

- *Suppliers must promote equal opportunities for all and embrace diversity in the workplace;*
- *Suppliers must promote an inclusive work environment that values the diversity of its employees;*
- *Suppliers must be committed to equal opportunities and not discriminate or tolerate discrimination or harassment with respect to gender, ethnic and national origin, race, colour, religion, age, disability, sexual orientation and identity, or any other characteristic protected by law; and*
- *Suppliers must take a proactive approach to the physical and mental wellbeing of their workforce.*

The Valuable 500 | disability confident | RACE AT WORK CHARTER

Health, Safety & Security Standards

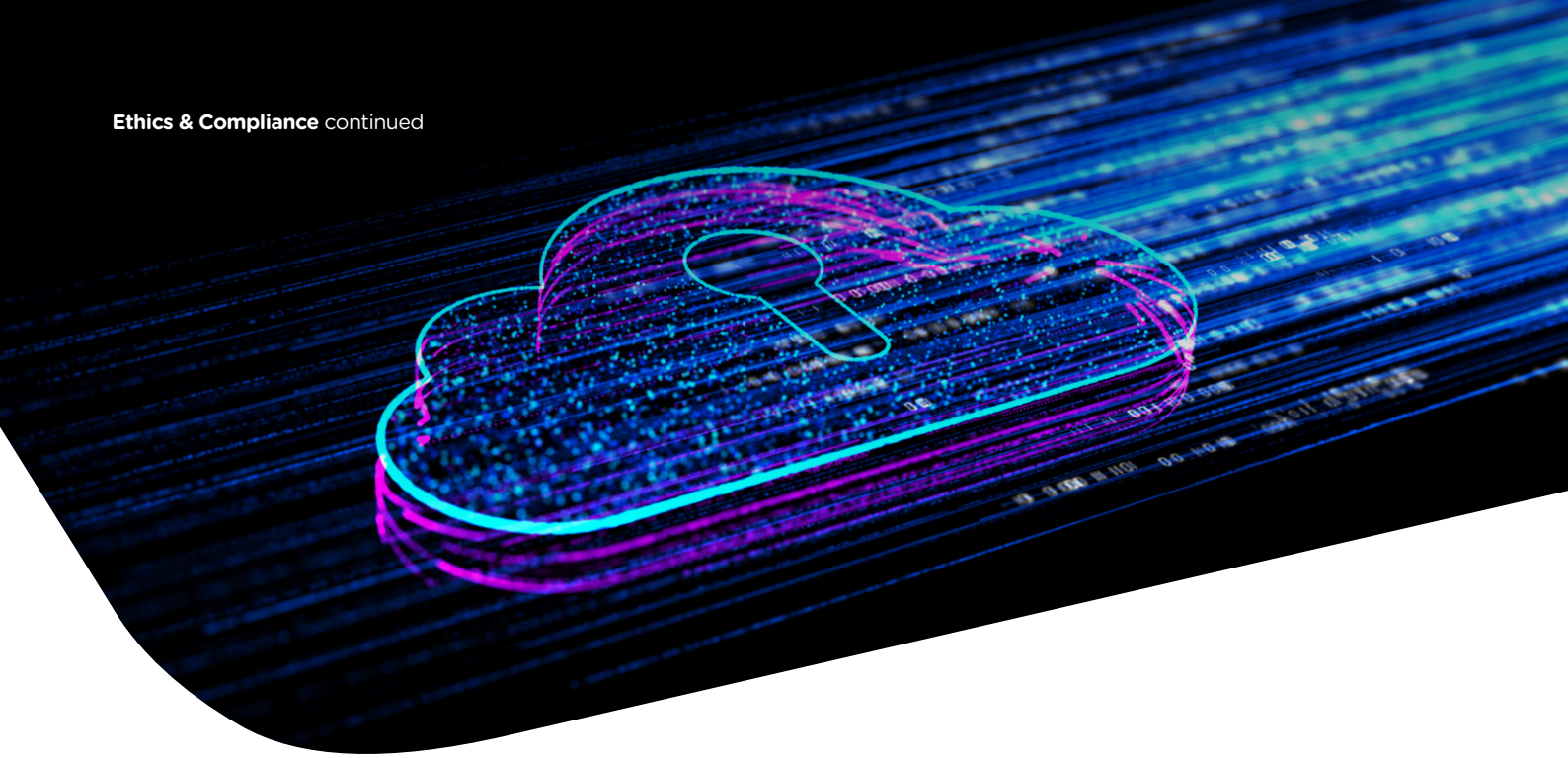
Whistl's Occupational Health & Safety Policy details how we identify, control and mitigate risks in order to safeguard the health, safety and welfare of all parties who may be affected by our activities. Whistl is committed to be the number one provider of its services and an industry leader in quality and customer services. Our decision making seeks to prevent pollution, reduce carbon emissions and all other environmental impacts.

Whistl expects suppliers to meet the requirements of its Occupational Health and Safety Policy when working on our sites.

What does this mean for our suppliers?

- *Suppliers must comply with the Whistl Occupational Health & Safety Policy and apply the same to their supply chain;*
- *Suppliers must proactively seek to provide a safe working environment for their employees and those affected by their activities;*
- *Suppliers must respond to any due diligence requests from Whistl in a timely manner;*
- *Suppliers must carry out suitable and sufficient assessment of all Health & Safety risks and implement processes and procedures to mitigate those which may result in work related injury, ill health, or damage to property; and*
- *Suppliers must provide training to their employees in all aspects of the above.*

> *Suppliers must proactively seek to provide a safe working environment for their employees and those affected by their activities*



Information & Cyber Security

We expect the highest standards of information and cyber security, regardless of whether information is ours, our customers', our staff or those outside Whistl. Everyone has a shared responsibility to minimise risk and keep Whistl and our customer's information safe and all IT services processing digital information secure.

What does this mean for our suppliers?

- *Suppliers must comply with privacy and data protection (including GDPR) laws and regulations, as well as our contract terms;*
- *Suppliers must comply with our information, physical, personnel and cyber security requirements and standards at all times;*
- *Suppliers must only retain data for as long as necessary for the purpose it was provided for;*
- *Suppliers must notify us promptly if they become aware of any security incident that may affect Whistl, our information, systems or assets;*
- *Suppliers must respond to any due diligence requests from Whistl in a timely manner;*
- *Suppliers must provide regular information security and data protection training for all staff;*
- *Suppliers must implement best practice IT security controls including AV, patching and upgrades, network security, endpoint security and strong 2FA to maximise security and should ideally be certified as complying with ISO27001;*
- *Suppliers must implement physical security controls such as barriers, CCTV, access control & monitoring;*
- *Suppliers must conduct pre-employment background checks/vetting on new employees; and*
- *Suppliers must have implemented risk management protocols such as conducting internal audits and risk audits.*

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Contact Us

You can access more information about Whistl here.

This Supplier Charter will be reviewed regularly. However, we value your feedback and you can share any feedback at any time with Procurement at **procurement@whistl.co.uk**

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