

RWS Group

Supplier Code of Conduct

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Approver: Maria Schnell

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1 Document history

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Richard Thompson	23/02/2021	Approval	1.0
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Harpreet Sagoo	01/09/2021	Document Review	3.0
Carla Matthews	27/10/2021	Approval	3.0
Rod Day	02/09/2022	Approval	4.0
Carla Matthews	17/05/2023	Document update to include: compensation and working hours; non-violent working environment; and freedom of association and the right to collective bargaining	5.0
Maria Schnell	24/05/2023	Approval	5.0

2 Summary

This Supplier Code of Conduct (“Code”) details the obligations and responsibilities that RWS Holdings plc and its subsidiaries and affiliates (“RWS”) require all third parties, contractors, business partners and their employees, personnel, agents, and subcontractors (collectively referred to as “Suppliers”) to adhere to when working with or for RWS. Suppliers are responsible for ensuring that the Code is adhered to throughout its Supply Chain.

RWS is committed to ensuring all people engaged with providing services to RWS are treated with respect and dignity, working in a safe environment free from harassment, and conducting themselves ethically at all times. RWS opts to work with Suppliers based on merit, reputation, and the ability to meet RWS’s business objectives related to price, quality, delivery, capability, reputation, integrity and social responsibility. RWS will endeavor to co-operate with Suppliers

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who adhere to similar ethical standards as those of RWS and whose businesses are conducted in an ethical and responsible manner.

Suppliers are encouraged to inform RWS at compliance@rws.com promptly in the event they become aware of a violation of the Code.

3 Associated documents

- Client Entertainment and Gifts Policy and Procedure

4 Conformance with the Code

Each of our Suppliers is required to conduct themselves and their business with the highest degree of integrity and must ensure that they follow the guidelines and principles of the Code below.

- **Legal obligations:** Suppliers must conduct their employment practices in full compliance with all applicable laws, rules, directives and regulations of the countries in which they operate, in addition to any contractual commitments. Suppliers acknowledge that compliance with the Code requirements may exceed local legal requirements and, in such cases, Suppliers are required to meet the obligations of the Code. Suppliers must self-govern compliance with the Code, but when requested by RWS, Suppliers must disclose information accurately and demonstrate compliance with the terms hereunder. Suppliers who fail to conduct themselves in accordance with the Code risk termination of their business relationships with RWS.
- **Compensation and Working Hours:** RWS expects from Suppliers that they observe the applicable laws and regulations outlining the working hours. Maximum working hours, overtime, breaks and leaves must comply with relevant legal requirements, or with applicable collective agreements. Suppliers shall ensure that compensation paid to its employees complies with all applicable wage laws, including those relating to minimum living wages, overtime hours, paid leave and mandatory benefits.
- **Anti-Corruption and Anti-Bribery:** RWS will NOT tolerate any form of bribery or corrupt behavior within its Supply Chain. RWS values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of our Suppliers are key to maintaining these standards. Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances. Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery. Bribes are not always a matter of handing over cash.

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Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision. The prevention, detection and reporting of bribery or corruption is the responsibility of all personnel involved in delivering services to and for RWS.

- Protection of confidential information: Suppliers may have access to confidential data belonging to either RWS or its clients. RWS is committed to working with Suppliers who ensure the safety of confidential information and refrain from any disclosures of such data through its Supply Chain.
- Conflict of interest: RWS requires its Suppliers to operate in a transparent manner and avoid any potential conflict of interests. A conflict of interest can occur when Suppliers' personal interests conflict with their responsibilities to act in the best interests of RWS. Personal interests include direct and indirect interests which result in the risk that a decision based on, or affected by, these interests, rather than in the best interests of RWS. Examples of conflicts of interest include (but are not limited to):
 - Personal relationships with either RWS or Supplier staff, where one party is in a decision-making role.
 - Having a financial or personal interest in the Supplier or RWS either via shares or a loan, or a relationship at Board level which facilitates access to decision makers.
- Gifts and Entertainment: RWS accepts that it is sometimes customary and appropriate to give and receive gifts from a Supplier, particularly in connection with product demonstrations or promotional events. However, if the giving or receiving of gifts or hospitality is in any way for the purposes of obtaining an inappropriate advantage or benefit, then this may amount to a bribe which is prohibited by RWS. As a general rule, RWS prohibits Suppliers from offering gifts or entertainment during an RFP process. In the case a Supplier does entertain or provide a customary gift to an employee of RWS in such case the maximum amount should be £50 or the equivalent in local currency (please see RWS Group Client Entertainment and Gifts Policy and Procedure for more detail).
- Safe working environment: RWS is committed to the health and safety of all employees and those who enter RWS's premises. It is important that RWS and its Suppliers operate in a manner which promotes respect and creates a safe and healthy workplace for the employees, contractors, partners, customers and visitors to any office. Furthermore, Suppliers shall endeavor to ensure acceptable living conditions for employees.
- Non-violent working environment: RWS condemns all forms of violence. Suppliers will not permit any corporal punishment (including disciplinary practices), inhumane treatment, bullying, and threats of physical violence.
- Freedom of association and the right to collective bargaining: RWS supports freedom of association and the right to associate, organize and bargain collectively. The Supplier shall recognize and respect the right of its employees to freely associate, organize and bargain collectively in compliance with all applicable laws and regulations of the countries in which they are employed.
- Free from discrimination and harassment: RWS believes in working with businesses which share the same values as RWS. For that reason, we seek to work with

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Suppliers who perform at a high level and operate in environments which do not discriminate either in a negative or positive manner. We expect our Suppliers to identify, adopt, and integrate diversity into their own supply processes and hiring, including equal treatment in the supplier selection process. In particular, our Suppliers must make all employment-related decisions based on skills and aptitude, never on legally protected personal characteristics.

- Prohibition against child or forced labour: All forms of child labour or forced labour are expressly prohibited. RWS works actively with suppliers who adhere to the same standards.
- Environmental laws: RWS is committed to minimizing waste and is focused on recycling all office waste where possible. As a minimum RWS expects Suppliers to comply with all local environmental laws applicable to their operations. RWS encourages Suppliers to implement systems that are designed to minimize the impact on the environment by their Supply Chain. Suppliers must obtain and keep current all required environmental permits, approvals and registrations, and follow applicable operational and reporting requirements. Suppliers will identify and manage chemicals and other materials posing a hazard to human health, human safety or the environment to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Suppliers will monitor and treat as required prior to discharge or disposal all wastewater and solid waste generated from operations. Suppliers will adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

5 Code review

This Code is available on the Group’s intranet. If there are amendments to the applicable legislation or regulatory requirements, the Code will be amended to reflect these. There will be an annual review by the person responsible for the Code to ensure the document is fit for purpose and remains effective.

Any changes will be communicated by email by way of the “Regulatory and compliance update”, team briefings or training, depending on the complexity of the amendment.

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