



Supplier Code of Conduct

About Global

Global Media & Entertainment Limited and its group companies ("**Global**") is one of the world's leading media and entertainment groups. It is Europe's largest radio company and a leading outdoor advertising business company in both the UK and Europe. To find out more about Global go to global.com.

Code of Conduct

Global strives to maintain throughout its operations a work environment that reflects the highest standards of business ethics and workplace behaviour and is committed to legal compliance and ethical business practices in all its operations.

When we talk about "**Suppliers**", this means anybody who supplies goods and/or services to Global and anyone who works for the Supplier or any other contractors or companies that they use to help provide goods and/or services to Global.

Global is firm in its resolve to do business only with those Suppliers who share in its commitment to conduct business responsibly, with integrity and transparency.

Global chooses Suppliers to work with on the basis that they meet the same high business standards set out by Global and contractually requires them to comply with this Code of Conduct. Global places an obligation on the Suppliers it engages with to ensure that compliance with this Code of Conduct is passed down and communicated through the Supplier's own supply chain where applicable. This includes maintaining appropriate policies and procedures to ensure the requirements in this Code of Conduct are taking place in their own businesses or associated supply chains.

Global expects all its Suppliers to comply with all applicable laws, statutes, regulations and codes from time to time in force in the places in which they do business ("**Applicable Laws**"), and to maintain the highest degree of ethics in every aspect of their business with Global.

Global reserves the right to monitor compliance with this Code of Conduct and to ensure that it is being respected throughout its supply chain. Further to this, Global may require Suppliers to obtain and maintain such supplier accreditations as specified by Global which may include, but are not limited to, the Alcumus SafeContractor or SafeSupplier accreditation. Global reserves the right to request directly or via Alcumus, Supplier documentation, conduct audits, review and approve corrective action plans and verify implementation of corrective action.

Suppliers must notify Global if they become aware of any non-compliance with this Code of Conduct (including non-compliance with Applicable Laws). Suppliers are expected to provide any information that is reasonably requested by Global, directly or via Alcumus, to evidence that they have appropriate systems in place to monitor and ensure their compliance with this Code of Conduct and are able to continue complying with this Code of Conduct and, where required, their accreditation with Alcumus for the duration of the relationship.

Adoption of, and adherence to, this Code of Conduct by a Supplier is a prerequisite for Global in its selection of new Suppliers.



If it is found that a Supplier has committed one or more violations of this Code of Conduct, Global will take appropriate action, taking into account any mitigating factors such as timely notification. Such action may range from working with the Supplier to correct breaches and prevent their recurrence, terminating Global's business relationship with the Supplier (including any contacts), commencing legal action or other actions as warranted in accordance with Global's rights.

Modern Slavery & Ethical Employment

Global aims to ensure that there is no risk of any kind of exploitation or forced labour in our supply chain and that sound employment practices are in place. All Suppliers must:

- comply with all Applicable Laws regarding slavery, servitude, child and/or forced or compulsory labour and human trafficking, including the UK Modern Slavery Act 2015;
- not employ or exploit individuals in the workplace who are under the minimum age of employment in the relevant country or, if there isn't one, under the age of 15;
- comply with all Applicable Laws regarding employment including those prohibiting discrimination, harassment or victimisation of workers;
- comply with all Applicable Laws regarding fair and ethical employment practices including those relating to wages, hours, overtime and benefits, health, safety and the environment;
- not charge individuals a fee of any kind in connection with their recruitment or ask individuals to pay a deposit as a condition of being offered work;
- not confiscate or withhold identity papers or any valuable items from individuals who work for the Supplier;
- always provide individuals who are employed by the Supplier with written details of their employment or engagement;
- ensure that there is no harsh or inhumane treatment of any kind in the Suppliers' workplace to individuals (including in its disciplinary policies) including but not limited to acts of sexual, physical, verbal, psychological or any other form of harassment, abuse, sanctions or discrimination;
- ensure that individuals who are employed by the Supplier, directly or indirectly, are treated fairly and equally regardless of their nationality, colour, religion, age, sex, gender, sexual preference, gender identity, disability or any other classification;
- provide a method for individuals who are employed by the Supplier to confidentially raise concerns and protect such individuals reporting misconduct or raising concerns with respect to their own, or another organisation, whether their concerns turn out to be correct or not (provided there was no malicious intent);
- ensure that individuals who are employed by the Supplier are paid at least the legal minimum wage or national living wage (as applicable);
- ensure that any pay deductions made by the Supplier are in compliance with any applicable tax laws;
- not force individuals who are employed by the Supplier to work over the number of hours allowed under Applicable Laws; and
- not unreasonably stop individuals who are employed by the Supplier from working.

Anti-bribery, Corruption and Anti-Tax Evasion

Global enforces strict compliance with anti-bribery, anti-corruption, anti-tax evasion and antifacilitation of tax evasion Applicable Laws with Suppliers that provide goods and/or services to Global. All Suppliers must:

- comply with all Applicable Laws relating to anti-corruption, anti-bribery, anti-tax evasion and anti-facilitation of tax evasion, including in all cases the United Kingdom Bribery Act 2010, the



United Kingdom Criminal Offences Act 2017, the United States Foreign Corrupt Practices Act, the Organization for Economic Cooperation and Development Convention on Combatting Bribery of Foreign Public Officials in International Business Transactions, and EU and US sanctions laws and orders;

- comply with all Applicable Laws regarding political contributions and payments;
- not directly or indirectly encourage, offer, give or receive any discounts, payment, benefit in kind, or gift that might improperly influence or look like it improperly influences anyone or any company. A "**benefit**" includes but is not limited to entertainment, meals, transportation, reimbursement of expenses, job offer, offer of consultancy contract or other favour, kickback or personal benefit;
- not enter into any business arrangement directly with employees of either Global or of its clients;
- not engage in any form of tax evasion or facilitation of tax evasion (whether UK or foreign) and must not aid, abet, counsel or procure the commission of a tax evasion offence by another person; and
- notify Global immediately if they become aware that they are not in compliance with antibribery, anti-corruption, anti-tax evasion or anti-facilitation of tax evasion legislation.

Health, Safety and Environment

Global expects all Suppliers to provide a safe working environment for all individuals that it employs. Furthermore, Global wishes to engage Suppliers that share in our commitment to sustainability by meeting and exceeding the requirements of environmental laws and regulations. All Suppliers must:

- comply with all Applicable Laws, regulations and standards in regard to health and safety and the environment;
- proactively manage health and safety risks to support an incident free working environment where occupational injuries and illnesses are prevented;
- implement (where possible) management systems to recognise, evaluate and control hazards related to their industry specific organisation;
- consider the health and safety impact of equipment and materials prior to these being used;
- comply with all rules, codes, standards, agreements and procedures provided to the Supplier in respect to any property, asset or infrastructure; and
- consider the environmental impacts of daily business processes and strive to implement opportunities for conservation of natural resources, recycling, energy reduction and pollution control to ensure cleaner air, water and to reduce landfill waste.

General Business Practices

Suppliers that are engaged by Global shall conduct their business interaction and activities with integrity and in accordance with all Applicable Laws and their contractual obligations as agreed with Global. All Suppliers must:

- comply with all Applicable Laws, regulations and standards regarding privacy, data protection and information security;
- comply with all Applicable Laws, regulations and standards regarding public procurement;
- comply with anti-competitive business practices and non-adherence to applicable local and international anti-trust laws;
- comply with all Applicable Laws regarding imports and exports of technology and other goods;
- comply with any ethical sourcing or fair labour principles notified to the Supplier which the purchaser of Global's services requires;



- not use Global's name, assets (including intellectual property), facilities or services without prior written authorisation from Global or for any improper purpose;
- not disclose or share Global's confidential or proprietary information with any third-party (including the press) without prior written authorisation from Global; and
- maintain (as per statutory and contractual requirements) accurate financial reporting systems and records relating to its dealings with Global.

General Terms

If this Code of Conduct conflicts with the terms of any agreement between the Supplier and Global, and the contract terms are more restrictive than this Code of Conduct, the Supplier must comply with the more restrictive terms of the contract.

Further Information

If further information is required regarding this Supplier Code of Conduct, please contact the Global Procurement Team at GlobalProcurement@global.com.

