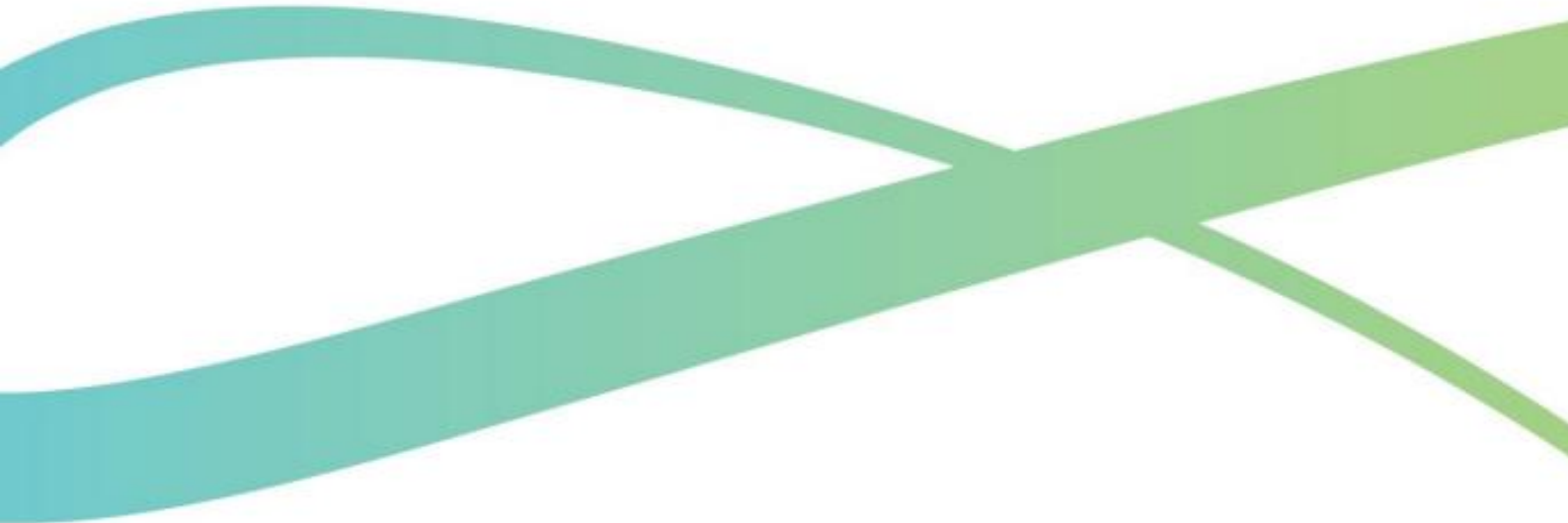


Supply Partner Code of Conduct v1.0



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1 Objective

At Parkingeye we are committed to achieving high performance whilst upholding our strong ethical and professional standards. Our supply partners are an integral part of our business, and we place great value on strong supplier partnerships, so it is important that our supply partners are also committed to meeting the same high standards.

This Code of Conduct sets out a clear framework of standards and outlines our expectations of ourselves and our supply partners, focussing on:

- Ethical business practices;
- Fair employment and working conditions; and
- Safeguarding the environment.

The primary purpose of this Code is to promote transparency and accountability for unethical practices throughout our supply chain, by detailing the minimum standards that our supply partners must meet.

2 Scope and Governance

This Code of Conduct is mandatory and applies to all global Parkingeye supply partners, consultants and contractors.

A global supply chain drives value and efficiencies but also brings ethical challenges and environmental risks and complexities.

- We ask all direct Parkingeye supply partners to ensure that 2nd and 3rd tier supply partners and subcontractors also meet the standards in this Code of Conduct, (or an equivalent set of standards), thus promoting these as a minimum, across our supply chain.
- Recognising differences in global cultures and law enforcement, we expect that wherever our supply partners are located, that they produce products and deliver services in a manner consistent with the standards set out in this Code.
- This code may be subject to audit. We expect supply partners to put processes in place to support meeting these standards and to be transparent and accommodating if requested to collect or provide evidence of supply chain compliance to this Code.
- Preference shall be given to supply partners who strive to achieve and exceed the standards set out in this document, whilst always complying with all applicable local laws and regulations.

This Code of Conduct is:

- Owned by the Head of Procurement;
- Reviewed annually;
- Communicated across internal departments; and
- To be adhered to by all supply partners.

Governance of this policy includes alignment with:

- Relevant UK and international legislation;
- **UN Global Compact** and **International Labour Organisation** (ILO) standards;
- ISO Standards including **ISO 20400** (Sustainable Procurement); and
- **EcoVadis** sustainability principles.

3 Ethical Business Practices

At Parkingeye our culture of integrity and ethics is embedded across our operations:

- Annual staff training on anti-bribery & corruption, anti-money laundering & fraud, information security, data protection & data privacy;
- Policies enforced through our Employee Handbook and Code of Ethics; and
- Supply partner expectations aligned via this Supplier Code of Conduct

3.1 Supply partners must be able to demonstrate a similar commitment by understanding and complying with all applicable laws, and acting ethically, encouraging honesty and openness regarding, but not limited to:

- Anti-bribery & money laundering – the **Bribery Act 2010** makes it an offence to pay or receive a bribe, either directly or indirectly and is supplemented by laws against money laundering, fraud and theft. Supply partners must have adequate anti-corruption policies in place to deal with these risks.
- Gifts & hospitality – supply partners must not offer gifts or inducements (e.g. hospitality or entertainment) to a Parkingeye employee which might influence or appear to influence the employee's business decisions in respect of its dealings with them.
- Conflicts of interest – supply partners should disclose any conflict or potential conflict of interest as soon as they become aware of them, so that they can be fully considered and the most appropriate action taken.
- Confidential information, Data protection & personal information – supply partners have a responsibility not to disclose information if it has value to Parkingeye and which is not publicly available, and to comply with all applicable laws in collecting, processing, storing or otherwise handling personal data.

3.2 We strictly adhere to the **Competition Act 1998**, promoting fair competition and rejecting anti-competitive behaviour, price fixing, or market manipulation. Breaching competition law has serious consequences.

- Supply partners should have policies in place to prevent and report anti-competitive practices. This includes ensuring that all statements and communications when preparing proposals or bids are accurate and truthful.

4 Human Rights & Labour Standards

Parkingeye support fair and decent working conditions throughout our supply chain, in line with the **UN Global Compact** and **International Labour Organisation (ILO)** standards.

We expect our supply partners to support and respect the protection of workers human rights throughout their operations and supply chain, and act against any non-compliant issues:

- Ban discrimination and implement appropriate diversity, equality and inclusion measures.
- Treat all workers with respect and dignity, not tolerating harassment, violence, sexual abuse or mental or physical coercion.
- Identify and prevent any adverse human rights infringements:
 - Prevention of child labour
 - Prevention of forced labour including any kind of modern slavery exploitation such as human, labour or sex trafficking and debt bondage
 - Pay fair wages and benefits
 - Prevention of unlawful working hours or overtime
 - Allow freedom of movement and personal freedom
 - Support grievance mechanisms for workers and stakeholders to voice issues.
- Providing as a priority, a healthy and safe working environment, demonstrating implementation of H&S management systems.

5 Environmental Sustainability

Environmental considerations are integrated into all our sourcing decisions. Since 2019, Parkingeye has calculated its carbon emissions and aims to reach Net Zero by 2050 or earlier.

Supply partners are expected to have strategies and operational programs in place to understand and minimise their environmental impact, and as a minimum:

- Comply with all applicable environmental laws and regulations;
- Have energy efficiency processes and water protection standards in place;
- Have emission control and reduction processes;
- Use the most sustainable materials and packaging possible, such as renewable / recycled / recyclable / biodegradable;
- Offer product options with a lower life cycle impact where possible;
- Meet harmful and nonharmful waste and disposal material regulations;
- Comply with all regulations relating to the storage, handling and disposal of hazardous substances;
- Collaborate on low impact transportation / logistics; and
- Where requested, share their carbon emissions to help us report accurately on our scope 3 emissions.

6 Supply Partner Engagement & Monitoring

Collaboration, transparency and accountability are key. Parkingeye will:

- Engage and train our own teams on this Supply Partner Code of Conduct;
- Collaborate with supply partners on ethical standards and sustainability goals;
- Seek assurance from supply partners that they comply with this Supply Partner Code of Conduct through our procurement sourcing processes and through periodic review of compliance, including auditing when required, either in person, online, or via external third parties – the depth of assessment will be proportional to the level of identified risk, criticality, or spend with the business;
- Request key supply partners complete ESG aligned questionnaires and provide relevant policies and evidence of good practice;
- Hold regular supplier review meetings with key stakeholders;
- Monitor all 1st tier supply partners, and also 2nd and 3rd tier supply partners where possible, through CreditSafe Group, for credit and compliance issues:
 - Including screening for PEPs, sanctions, law enforcements and adverse media (in terrorism, organised crime, modern slavery, financial crime & fraud, bribery & corruption, cybercrime, and other alleged offences).
- Offer guidance, templates, and training; and
- Signpost supply partners to industry and market tools.

Where gaps exist or we are alerted to a potential risk, we will then follow a thorough investigation and audit process, provide constructive feedback and allow time for improvement. Where supply partners show willingness to improve, we shall offer support. Where performance remains poor, we will take proportionate action and reserve the right to remove supply partners from our supply network.

7 Continuous Improvement

We will:

- Review this Code of Conduct at least annually;
- Update it based on data, trends, industry standards, changes in laws and regulation, and stakeholder feedback; and
- Encourage reporting of any suspected breach of this Code of Conduct.

8 Raising Concerns

Incidents, concerns and violations must be reported. To report a suspected breach of this Code:

- Employees of Parkingeye can refer to the Speak Up Policy.
- Supply partners of Parkingeye can contact:
 - procurement@parkingeye.co.uk,
 - legal.team@parkingeye.co.uk, or
 - hr@parkingeye.co.uk

Please provide as much information as possible to make it easier to identify and resolve any concerns.

A supply partner's relationship with Parkingeye will not be adversely affected by an honest report of potential misconduct.

9 Contacts

Parkingeye may amend the Supply Partner Code of Conduct from time to time by giving supply partners 30 days' notice in writing, which includes by email. The latest version is available on the website.

Supply Partners shall provide a signed declaration to Parkingeye confirming its ability and willingness to comply with this Code, in the form set out in section 11 below. Such declaration shall be provided to Parkingeye upon receipt of this Code of Conduct and upon Parkingeye's reasonable request thereafter.

For questions or further information, please contact the Procurement team:

procurement@parkingeye.co.uk

10 Signed Declaration

As required by Parkingeye's Supply Partner Code of Conduct, as at the date of signature:

- We acknowledge receipt of the **Parkingeye Supply Partner Code of Conduct**.
- We have reviewed the requirements and agree to work towards full compliance, abiding by the principles set out in the Code of Conduct to:
 - Ensure ethical business conduct;
 - Demonstrate human rights and fair labour practices;
 - Minimise our environmental impact; and
 - Promote these standards across our supply chain.
- We understand the importance of being able to demonstrate the steps we have taken to meet the standards in the Code of Conduct.
- We agree to permit and facilitate audits by Parkingeye and its nominated third parties to assess compliance with the expectations set forth in the Code, upon reasonable notice.
- We agree to work with Parkingeye where any actual or potential breaches of the Code of Conduct are identified and will implement agreed remediation actions.
- We will report any suspected breach of this Code we become aware of, without delay.
- If the Code conflicts with the terms of our supply partner contract with Parkingeye, and the contract term is more restrictive than this Code, we agree to comply with the more restrictive term of the contract.

Supply Partner Details:

Company Name:

Authorised Supply Partner Representative:

Signature: Date:

Printed:

Title / Position:

- This Declaration must be signed by a director or other senior authorised representative of your company.
- Only supply partners who sign this Declaration, or can demonstrate their own set of comparable standards to the Supply Partner Code of Conduct, will have a "preferred supply partner" status.
- Failure to sign and return this Declaration may result in you being excluded from a sourcing project and / or in the suspension or termination of the commercial relationship with Parkingeye.