Supplier Code of Conduct

Introduction

esure Group is committed to working in a responsible, sustainable and inclusive manner, ensuring all colleagues are valued and treated with respect and our customers are at the heart of what we do. We believe in working in partnership with our suppliers to ace what matters most for our customers ensuring quality, value and timeliness throughout our supply chain. esure expects all of our suppliers to operate on the same principles.

Supplier acknowledges and agrees that it will comply with this Code and that any non-compliance with the Code constitutes a material breach of the then current agreement, the Purchase Order Terms or other terms and conditions applicable between esure and Supplier. In such case of non-compliance, without prejudice to esure's other rights and remedies, esure has the right to immediately terminate the partnership.

1. Compliance

You will:

- 1.1. comply with all applicable laws and regulations; and
- 1.2. inform us if anything changes or if you have concerns about future compliance.

2. Human Rights

We are committed to upholding the requirements of the European Convention on Human Rights, the UK Human Rights Act 1998 and the UK Modern Slavery Act 2015, and to making sure slavery, human trafficking and child labour is not taking place in any part of our own business or supply chains.

You will:

- 2.1. comply with all relevant legislation, regulations and directives, including the Modern Slavery Act and its reporting obligations in the countries and communities in which you and your supply chain operate;
- 2.2. provide clear and uniformly applied disciplinary and grievance procedures including prohibiting mental, physical or verbal abuse; and
- 2.3. Ensure fair compensation and provide at least wages that meet legally mandated minima without unlawful deductions.

3. Inclusion and Diversity

Our commitment is to create an environment in which individual differences and contributions are recognised and valued and to safeguard a working environment that promotes dignity and respect to all so that we can play strong as one. No form of victimisation, discrimination, bullying or harassment is tolerated.

You will:

- 3.1. treat all workers fairly and not discriminate against any group in your employment practices, in particular on the basis of age, disability, race, ethnicity, gender, social background, sexual orientation, gender identity, faith, or family circumstances;
- 3.2. proactively support the development of an inclusive and diverse workforce including fair representation of women, disabled, LGBT and BAME employees; and
- 3.3. strive for a supply base that is inclusive and diverse (namely supporting SMEs, Social Enterprises as well as under-represented groups) where possible.

4. Business Ethics

We expect our suppliers, its employees, subcontractors and officers to act with honesty and integrity at all times to safeguard the trust in which esure is held by its customers, suppliers and other individuals and organisations with which our business interacts.

You will:

- 4.1. have appropriate governance in place to ensure you are conducting business responsibly;
- 4.2. report to us any potential conflicts of interest; and
- 4.3. never offer or accept any bribe or gift that can be construed as a bribe and report any such offers received to esure.

5. Environmental, Social and Governance (ESG)

We believe the consideration of ESG (environmental, social and governance) risks and opportunities is important to deliver sustainable, long-term value creation. We are committed to driving good and helping the UK become a sustainable, low-carbon economy by working with suppliers that develop and deliver their goods and services in a sustainable way.

You will:

- 5.1. abide by all legislation and regulations related to environmental protection;
- 5.2. understand the ethical and sustainability-related practices of your supply chain; cooperate, and involve your supply chain where necessary, with any supplier surveys and audits to be conducted by us from time to time;
- 5.3. identify areas of concern and address ethical and sustainable practices within your supply chain:; and
- 5.4. have a sustainability strategy which sets out how your organisation is working to reduce your environmental impacts and support the transition to a low-carbon economy.

6. Health and Safety

We are committed to conducting all our activities in a manner which achieves the highest practicable standards of health and safety.

You will

6.1. provide a safe work environment abiding by local and international laws and regulations, respecting the health and wellbeing of your workers, any sub-contractors and visitors to your site;

- 6.2. identify and mitigate any risks arising that could adversely impact your staff or your supply chain by undertaking risk assessments of all work activities, items of equipment, processes and environments; and
- 6.3. identify any activities that have the potential to adversely impact human or environmental health and make sure they are appropriately managed, measured, controlled and treated prior to release of any substance into the environment.

Summary

If you become aware of any issue that you believe may, or has already caused a breach of this Code, this should be communicated to your esure relationship manager, esure's General Counsel or Head of Procurement.

What we expect from you:

- confirm your agreement to comply with this Code (and any future revisions) when you agree contract terms;
- ensure you have adequate policies and/ or statements in place that support this Code which are appropriate and relevant;
- provide evidence of how you meet the expectations outlined within this Code when requested to do so by esure;
- ensure you conduct business in a fair and honest manner; and
- inform us if anything changes and you are unable to comply with this Code.