



HUMAN NATURE:
AT ITS BEST

Code of Conduct

Suppliers & Field Team

Aug 2022



What is it?

Our Code of Conduct sets out what we value as a company and what we expect of all who work with us keeping *Human nature: At its best* at our core.

This code cannot cover every possible situation, we therefore request you to use your best judgment in applying the principles of the Code.

We appreciate you may have your own guiding principles, and we don't expect you to replace these, however, we do ask that you follow and understand our code, acknowledging that we only work with those whose standards are consistent with our own.

Our Code of Conduct applies to all Ground Control Suppliers and our Field Teams and we expect you to place these same standards on your supply chain.

Our Code of Conduct follows and builds upon the principles defined in the UN Global Compact, and the [Human Rights Act 1998](#).

Ground Control is a Partner of the Supply Chain Sustainability School, which provides free resources at the point of use. Throughout this document we have provided links to videos and e-learning modules to enable our suppliers & Field Teams to gain more knowledge in certain areas. If you are not already a member you can easily create a login for free.



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Raising a concern

In line with the whistleblowing and protected disclosure processes details in the [Employment Rights Act 1996](#), if you have a serious concern that something may not be consistent with this Code we encourage you to do the right thing and raise it in confidence. We will support you for doing this and will not tolerate discrimination against anyone who has raised something in good faith.

Any disclosure will be treated seriously and treated in the strictest of confidence. The origin of any allegation will be kept confidential wherever possible.

In the first instance you should discuss the matter with senior management within your organisation, who in turn should feel confident to raise it with Ground Control senior management.

If you believe it is not appropriate to report your concerns to your Line Manager the matter can be disclosed to our People Director, Managing Director or CEO



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Human Rights

Wherever we work we ensure that we do not exploit anyone.

We uphold the United Nations Universal Declaration of Human Rights for all those who work for or with us. This includes the right to life, liberty and security; equal rights of men and women; the right to protection under the law and against discrimination, slavery, servitude, torture, or inhumane or degrading treatment; and freedom of speech, thought, conscience and religion.

We will not do business with anyone who fails to support these basic human rights.

Our suppliers and Field Teams must share our commitment to complying with:

- The principles set out in the United Nations Universal Declaration of Human Rights and UN Global Compact initiative
- The principles of our Code



Labour

We do not tolerate forced, debt bonded, indentured labour practices, or human trafficking.

We have a zero tolerance attitude to modern slavery and human trafficking within our business. We expect all our suppliers and field teams to comply with the [Modern Slavery Act 2015](#) and manage their risk of exposure to modern slavery.

As a Real Living Wage Employer we are committed to setting wages in line with Real Living Wage Foundation to allow our employees to meet everyday needs. We encourage our suppliers and Field Teams to do the same and as a minimum we expect them to pay their workers fairly without unlawful or unethical deduction of wages.

Our suppliers and Field Teams must share our commitment to complying with:

- The principles set out in the UN Global Compact initiative
- The International Labour Organisation's standards regarding child labour and minimum age
- The Ethical Trading Initiative (ETI) Base Code
- The principles of the Modern Slavery Act 2015
- National legal requirements regarding wages, working hours and the right to work

[Ground Control's Modern Slavery and Human Trafficking Annual Statement 2022](#)

Environment

We care for our environment

We recognise our operations are impacted by, and impact on the environment. As such GC are committed to minimizing our negative impacts and where appropriate enhancing the environment through our operations.

We have a responsibility to protect nature, achieve net zero carbon emissions, and use resources responsibly. Sustainability is at the heart of everything we do and we are focusing on four key areas where we feel we can make a difference.

Our suppliers and Field Teams must share our commitment to:

- Continually improve our environmental performance
- Avoiding pollutions and protecting nature
- Reducing carbon emissions
- Using resources responsibly
- Working in line with all relevant environmental legislation



Anti-Corruption

We will not give or receive bribes or participate in any form of corruption.

We do not condone dishonest practices including bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement or money laundering.

Our suppliers and Field Teams must share our commitment to:

- Never offer or give bribes or make improper payments to obtain or retain business, or to gain an unfair advantage
- Never receive bribes or accept improper payments from other in order for them to obtain or retain business or gain an unfair advantage.
- Never use other or permit others to do so

Fraud, deception & dishonesty

We operate with integrity, honesty and trust.

We will not claim for something we are not entitled to, deceive anyone, act dishonestly or misuse company property or resources or facilitate tax evasion.

Our suppliers and Field Teams must share our commitment to:

- Never seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims
- Never defraud or steal from the company, a customer or any third party, and any kind of misappropriation of property
- Always act honestly, fairly and openly, carefully checking or inspecting everything that you are responsible for
- Always ensure full compliance with tax obligations





Equality, diversity & dignity

We do not tolerate bullying, harassment, discrimination or exclusion of any kind

We are committed to a fair, inclusive and respectful working environment, where we ensure equality of opportunity and non-discrimination.

It is against the law to discriminate against someone because of age, disability, gender reassignment, marriage/civil partnership, pregnancy or being on maternity leave, race, religion or belief, sex or sexual orientation.

Our suppliers and Field Teams must share our commitment to:

- Not tolerate behavior or attitudes that support coercion, intimidation or discrimination
- Equal pay for like work or work of equal value regardless of gender
- Fair and inclusive recruitment, promotion and up skilling of their employees



Data protection

We respect everyone's privacy by complying with all data protection laws and will not tolerate individuals' information being mishandled.

We recognise and accept our responsibility and obligations as a data controller as set out in the European Union General Data Protection Regulation (EU GDPR). We ensure the confidentiality and integrity of Ground Control's employees' and contractors' personal information is maintained in alignment with the principles of the Data Protection Act 2018 and the United Kingdom General Data Protection Regulation (GDPR).

Our suppliers and Field Teams must share our commitment to:

- Process personal information in a fair, lawful and transparent manner
- Only collect and process personal information required to fulfil the service
- Not retain personal information for any longer than is necessary
- Ensure personal information remains accurate and up to date
- Ensure everyone managing and handling personal information understands their responsibilities



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Healthy, Safe & Injury Free

Nothing is more important than the health, safety and wellbeing of those who work for and with us

Work injuries and illnesses can affect every aspect of life for our workers and their families – our goal is to work injury and incident free.

Our suppliers and Field Teams must share our commitment to:

- Not tolerate unsafe actions or behaviours
- Zero tolerance of working under the influence of drugs or alcohol
- Ensure that all those working for and with you are put to work safely; including being fully briefed on risks, hazards and associated control measures.
- To always work safely and consider the safety of others who may be affected by your actions
- To stop work & report to your manager, if you believe your safety or the safety of others is compromised
- To report any accident or incident by the fastest means.

