

TEN

Supplier code of conduct

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Introduction

Ten Lifestyle Group Plc together with its subsidiaries (Ten / we / us / our) is a leading provider of global concierge and lifestyle services.

We are committed to building a sustainable business by minimising our impact on the environment, caring for our people and communities and promoting ethical governance. This includes objectives to ensure our people, members, clients and suppliers are also reducing their impact on the environment and contribute to the global communities in which they operate.

We wish to take a collaborative approach with our suppliers to improve their Environmental, Social and Governance (ESG) performance. Maintaining trusted, sustainable partnerships with suppliers that share our mission is integral to Ten's operations and the quality service we deliver for our Members.

Our core principles are reflected in this Supplier Code of Conduct (Code), which outlines the minimum standards and transparency we expect from all suppliers of products or services to Ten and/or its Members. Our suppliers should have processes in place to maintain these standards and be able to provide evidence if required.

1. Who does this Code apply to?

All Suppliers of products or services to Ten or its Members should comply with the Code and ensure that its People are trained so they are aware of and work in line with the relevant requirements of this Code. Suppliers should have appropriate processes and systems in place to ensure continuous compliance and to demonstrate such compliance.

2. Looking after your People and communities

Our vision is not only to create the world's most trusted service but importantly to provide equal opportunities and a healthy and safe working environment for our employees. This extends to how Ten treats all the people it interacts with, including Members, suppliers, and local communities. It is our expectation that our Suppliers also adopt this approach.

- **2.1 Human rights and community support.** You shall comply with all internationally recognised human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Ten's Declaration on Fundamental Principles and Rights at Work. You should also respect the human rights of the local communities within your business operations and identify and help mitigate social and ethical risks that exist within your sector and Supply Chain. We encourage Suppliers to have an active community involvement programme we support the release of staff to work upon community activities.
- **2.2 Equal opportunities.** Ten is an equal opportunities employer and you shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement or any employment practice based on race, caste, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status, disability, union membership or political affiliation or any other characteristic other than the individual's ability to perform the job subject to any accommodations required or permitted by law. You should seek to eliminate all forms of discrimination across your Supply Chain, develop a view on implementing gender and ethnicity targets in leadership teams, consider making external commitments in relation to your organisation's own inclusion agenda and use the best available guidance to identify and address unconscious bias in your organisation.

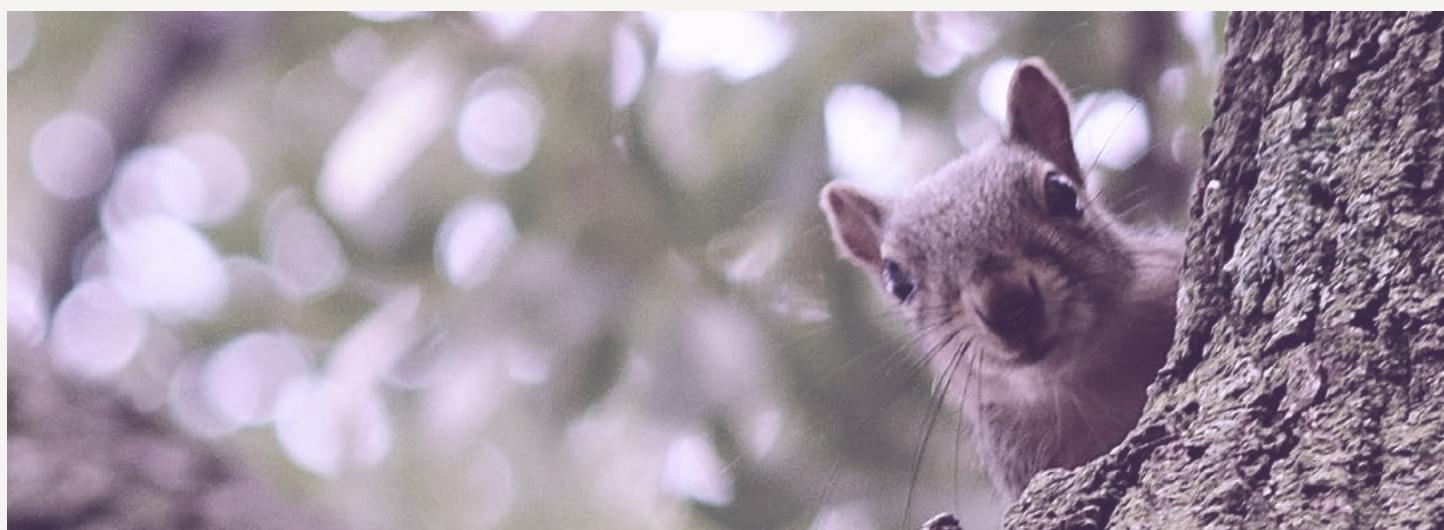


- **2.3 Working environment.** You shall provide a safe, healthy, and sanitary working environment for your People whilst complying with health and safety laws and any other relevant laws where it operates. This includes, but is not limited to, the supply of portable drinking water, adequate lighting, sanitation, and ventilation, implementing general and relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries, and further, by not engaging in activities that will endanger anyone's health and safety. Where such hazards cannot be adequately prevented or controlled, the you shall provide your People with appropriate personal protective equipment to protect against hazards typically encountered in that scope of work.
- **2.4 Pay and conditions.** You must compensate all of your People with wages, including overtime premiums, and benefits that at a minimum meet the higher of (a) the minimum wage and benefits established by applicable law; (b) collective agreements; (c) industry standards; and (d) an amount sufficient to cover basic living requirements. You shall respect, and shall not interfere with, the right of your People to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.
- **2.5 Slavery, human trafficking and child labour.** You shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015 (MSA 2015) in any part of your Supply Chain. This includes, but is not limited to, not supporting or engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour and prison labour. Ten is committed to meeting the requirements of the MSA 2015 and publishes an annual **Statement**.

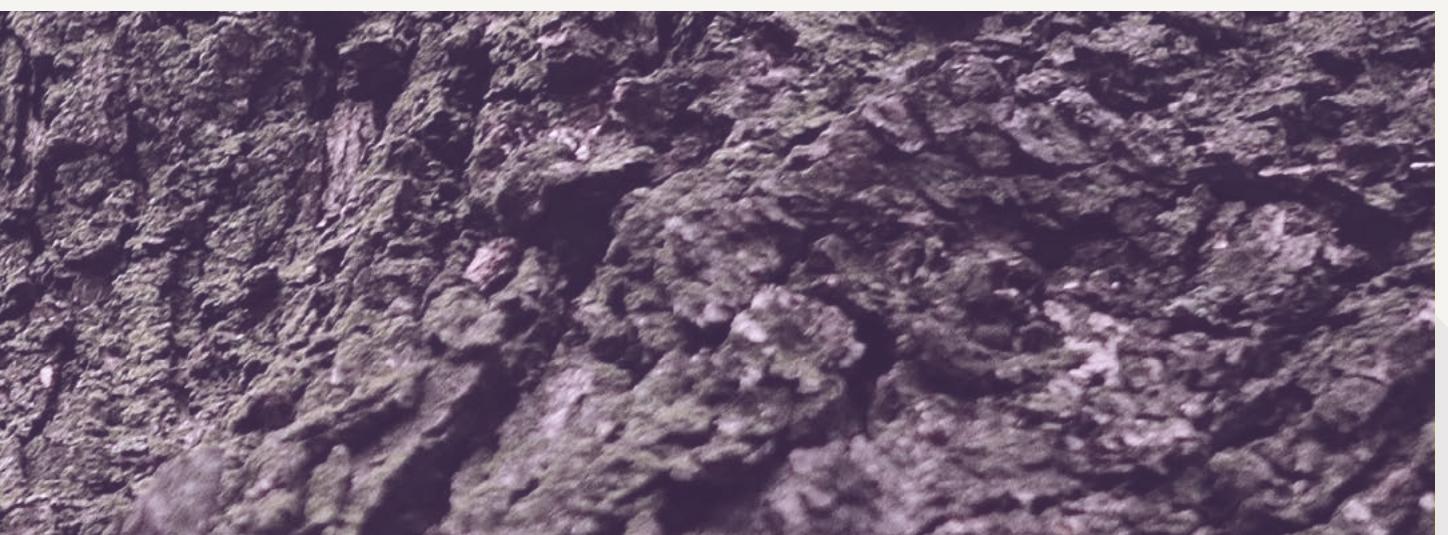
3. Environmental Sustainability

It is our collective responsibility to conserve natural resources and protect global ecosystems to support health and wellbeing, now and in the future.

- **3.1 Your responsibility to the environment.** You shall ensure that it has in place environmental codes that protect the welfare of your People and minimising environmental impacts, this means:
 - a) complying with all applicable environmental laws, including laws and international treaties and necessary environmental permits;
 - b) identifying the direct and associated environmental opportunities and risks to maximise benefits and avoid threats identify the direct and associated environmental opportunities and risks to maximise benefits and avoid threats;
 - c) measuring performance and manage operations in accordance with good environmental practice, including policies and procedures to reduce green-house gas emissions, energy, travel, water, waste, paper, single use plastic and pollution of land, air and water; and
 - d) collaborating with us and innovate to develop products and services which will help improve environmental performance and engage with us to understand the impact of your sustainability assessments.



- **3.2 Product safety and hazardous materials.** You shall have in place a suitable environmental management system for managing your environmental risks. As a minimum, the system should include and address the following:
 - a) an assessment of the environmental impact of all historical, current and likely future operations and begin to implement an approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous waste, in an appropriate manner;
 - b) steps to continuously improve environmental performance, reduce pollution, emissions and waste;
 - c) measures to reduce the use of all raw materials, energy and supplies; and
 - d) raising awareness and training your People in environmental matters.
- **3.3 Waste minimisation and prevention of pollution.** Constant careless disposal of wastes can negatively impact human and environmental health, the reduction in the use of unnecessary energy minimises consumption. It is essential to move toward managing and using alternate sustainable measures that do not have the same negative affect on the environment. This means being aware of what waste materials are before releasing them into the environment.



4. Good governance

We expect our Suppliers to follow good governance principles underpinned by robust processes.

- **4.1 Laws and regulations.** In carrying out your agreement(s) with Ten or our Members, you shall, in addition to complying with the standards set out in this Code, comply with all applicable laws and regulations where you or the Supply Chain operate. If there is a conflict between any applicable laws or regulations, the provisions of an agreement with Ten and the provisions of this Code, you shall meet the most stringent standard.
- **4.2 Bribery and corruption.** You shall comply with all applicable laws, statutes, codes and international regulations relating to the prevention of bribery and corruption (including but not limited to the Bribery Act 2010). To that end, you shall not accept, offer, promise, pay, permit or authorise:
 - a) bribes, facilitation payments, kickbacks or illegal political contributions;
 - b) money, goods, services, entertainment, employment, contracts or other things of value, in order to obtain or retain improper advantage; or
 - c) any other unlawful or improper payments or benefits.
- **4.3 Data protection and information security.** You shall comply with all data protection laws and requirements (including the UK GDPR) when processing any personal data on Ten's behalf and, unless otherwise agreed, you should comply with the terms of the Data and Privacy Policy set out in **Ten's Mandatory Policies**. You shall have in place appropriate measures to protect the integrity and confidentiality of information (including information belonging to or supplied by Ten held on your systems (which include physical and online or electronic systems) and ensure that there is no unauthorised access of the information by third parties, including your Supply Chain.
- **4.4 Treat Members fairly.** When dealing with Members, you shall always comply with the terms of any agreement with us or the Member. You, your Personnel and any members of your Supply Chain should treat Members with fairness, integrity, dignity and respect, including showing respect of the many different values, beliefs, cultures and religions held by our Members.

In the event that a complaint is raised by a Member, you should address it in a timely, fair and transparent manner. Should the Member be dissatisfied with your proposed resolution, it should immediately be refer to us and you shall collaborate with us to find an acceptable solution.

- **4.5 Unfair business practices.** You shall comply with all applicable competition laws (including but not limited to the Competition Act 1998), including but not limited to those relating to teaming and information sharing with competitors, price fixing and rigging bids.



- **4.6 Procuring and managing the Supply Chain.** You should carry out appropriate due diligence on prospective members of the Supply Chain, including investigations into prospective members of the Supply Chain's stance, public statements and actions on human rights, treatment of your people, bribery, ethical behaviour and environmental outlook and the prospective members of the Supply Chain's ability to meet the requirements and principles that are covered in this Code.

You should also ensure that agreements with members of the Supply Chain include provisions that require the members of the Supply Chain to comply with applicable provisions of this Code, ensure that it has measures to monitor that those members of the Supply Chain are complying and that it has systems in place to address any deficiencies or breaches of those requirements.

- **4.7 Prompt Payment Practices.**

In your dealing with members of the Supply Chain you should adhere to the best standard of Payment Practices and Performance Regulations, consider whether discounts can be given for the early payment of invoices and pay members of your the Supply Chain promptly, with the maximum payment period being (60) sixty days from the date of receipt of invoice.

- **4.8 Audit.** On request, you shall provide written confirmation that you have appropriate systems in place to monitor your compliance with this Code and it is able to comply with this Code for the duration of its relationship with us. We may conduct audits by giving you reasonable prior notice to verify your compliance with this Code. Ten is under no obligation to conduct any type of audits unless statutorily required to do so.

- **4.9 Remediation.** Should we become aware of a breach of this Code by you or your People, we will collaborate with you to develop a remediation plan specifying the actions that you will take that will

lead to compliance with the Code. If you fail to produce the remediation plan within an agreed timeframe or fail to implement it within a reasonable time, we may immediately terminate our business relationship with you (including any contracts).

Should we become aware that a member of your Supply Chain has been involved in an incident (or incidents) that would constitute a breach of any of the requirements under this Code, were they bound directly by it, we may require you to remedy that incident (or incidents) with that member of your Supply Chain. If you are not able to remedy such incident with that member of your Supply Chain within a reasonable time, we may immediately terminate our business relationship with you (including any contracts)

- **4.10 Updating this Code.** We may modify this Code from time to time on giving you at least 14 days' notice in writing (which includes email) or publishing an updated Code on our website (tenlifestylegroup.com/).

Definitions

In this Code:

Member(s) means individual(s) consumers that are registered to use Ten's lifestyle and concierge services and who may be referred to a Supplier to purchase goods and/or services.

Payment Practices Regulation means Statutory Review of the Reporting on Payment Practices and Performance Regulations 2017 and the Limited Liability Partnerships (Reporting on Payment Practices and Performance) Regulations 2017.

People means any individual whom the Supplier employs, hires or engages, or otherwise uses to conduct its business.

Supplier / you / your means a company, partnership or individual that provides goods or services to one or more members of the Ten group of companies or to its Members.

Supply Chain means the Supplier's suppliers, vendors, agents, and subcontractors who are involved in Ten's supply chain.

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Versions

Code version

1.0

Date

31 August 2022

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