



Supplier Code of Conduct

Howden Joinery Group Plc and all its subsidiaries and affiliates (“**Howdens**”) is a business based on trust. It is therefore imperative that we conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to unethical behaviour and corruption in all forms and are committed to managing our relationships with customers, contractors and business contacts with fairness and integrity.

We expect our suppliers, agents, contractors, consultants, distributors and other third parties with whom we have a business relationship (collectively, “**Suppliers**”) to conduct their business activities with a level of integrity which reflects our own values and principles.

These core principles are reflected in this Supplier Code of Conduct (“**Code**”), which establishes the minimum standards that must be met and be auditable throughout the full supply chain by our Suppliers. Given our reach in sourcing, this Code and the policies referred to within apply globally, and we expect the same comprehensive standards to be applied by our Suppliers regardless of geographical location.

PEOPLE

At Howdens we promote a culture and working environment where our people treat each other with respect, courtesy and fairness, promoting equal opportunity for all, and we expect our Suppliers to do the same. In particular, and in accordance with the United Nations Global Compact Initiative, Suppliers are required to uphold:

- the freedom of association and the effective recognition of the right to collective bargaining;
- the elimination of all forms of forced and compulsory labour;
- the abolition of child labour; and
- the elimination of discrimination in respect of employment and occupation.

Human Rights

Howdens takes a zero-tolerance approach to any infraction of human rights. Suppliers must 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 Organisation’s Declaration on Fundamental Principles and Rights at Work from time to time in force. Businesses should support and respect the protection of internationally proclaimed human rights within the scope of their influence, and at all times they must not be complicit in human rights abuses. We expect all suppliers to comply with our Human Rights Policy.

A copy of our Human Rights Policy can be found at: www.howdenjoinerygroupplc.com

Equal Opportunities

We are an equal opportunities employer and our Suppliers must 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 worker’s ability to perform the job subject to any accommodations required or permitted by law.

Health and Safety

We believe that all employees have a right to work in a safe and healthy environment and we intend to carry out our business without putting employees, or others, health or physical wellbeing at risk. Suppliers must equally provide a safe and healthy workplace for all its employees and conduct business in an ethical way.

As a minimum Suppliers are required to:



- Establish appropriate organisational structures and procedures for the effective management of health, safety and environmental risks;
- Ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of health and safety control measures;
- Ensure workers have access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers; and
- Working hours must comply with national laws and collective agreements.

Modern Slavery

Howdens is committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain, and we expect our suppliers to comply with the same high standards.

Suppliers are required to:

- Comply with all applicable modern slavery and anti-trafficking laws;
- Not, under any circumstances, engage in any activity involving modern slavery or anti-trafficking of any kind when acting for or on behalf of Howdens, to include any activities within the supply chain by any sub contractor, distributor, supplier and/or agents; and
- Be transparent and co-operative in the provision of relevant information where Howdens is conducting appropriate and proportionate due diligence on their business structure and operations.

A copy of our modern slavery statement can be found at [Modern Slavery Statement | Howden Joinery Group Plc](https://www.howdenjoinerygroupplc.com/governance/modern-slavery-statement) (<https://www.howdenjoinerygroupplc.com/governance/modern-slavery-statement>).

SUSTAINABILTY & ENVIRONMENT

Howdens has a clear ambition to be the UK's leading responsible Kitchen and Joinery business with plans to eliminate waste, emissions, and deforestation across the full value chain. To achieve our objectives, we expect the same commitment from all our Suppliers.

Suppliers shall ensure that:

- Its operations comply with all applicable environmental laws, including laws and international treaties relating to (but not limited to) waste disposal, emissions, discharges and the handling of hazardous and toxic materials. In addition:
 - Data relating to 2021 (Howdens base year) and 2022 must be received no later than 31st December 2023
 - Suppliers shall collect and report their emissions data quarterly thereafter
 - Suppliers will evidence clear decarbonisation plans in line with achieving a minimum 25% emissions reduction by 2030 (from Howdens Baseline year of 2021) and Net Zero, also defined as 90% reduction by 2050 - aligned with SBTi and the 2015 Paris Agreement
 - Suppliers will report physical risks throughout their supply chain evidence plans on mitigation
- Any goods manufactured, including the inputs and components that it incorporates into its goods, comply with all applicable environmental laws and treaties.
 - All Timber products will meet UKTR (UK Timber Regulation) and be certified where applicable with relevant schemes
 - Suppliers will evidence commitment to Zero Deforestation



- Wherever possible, Suppliers will only use packaging materials that comply with all applicable environmental laws and treaties. In particular:
 - Suppliers will commit to using 100% recycled packaging materials
 - Suppliers will demonstrate plans and activity for the removal of single use plastics from the whole value chain

ETHICS & ANTI-CORRUPTION

Anti-bribery and corruption

Howdens takes a zero-tolerance approach to bribery, corruption and any other form of illegal or unethical conduct. Suppliers are required to:

- Comply with all applicable anti-bribery and corruption laws;
- Ensure that they do not, under any circumstances, engage in any activity involving bribery or corruption of any kind when acting for or on behalf of Howdens. For the avoidance of doubt, bribery includes "facilitation payments", which commonly arise in the form of payments made to officials to obtain or speed up routine services which the officials are required to provide; and
- Be transparent and co-operative in the provision of relevant information where Howdens is conducting appropriate and proportionate due diligence on their business structure and operations.

Anti-tax evasion and anti-money laundering

We will not tolerate any involvement with, or facilitation of, tax evasion or money laundering within Howdens' business activities, or within the business activities of those who perform services for or on behalf of the Howdens Group. Suppliers are required to:

- Comply with all applicable anti-tax evasion and anti-money laundering laws;
- Ensure that they do not request cash payments in respect of goods/services provided to Howdens and ensure that, at all times, they make accurate and honest representations to Howdens during the course of relevant accounting and/or on-boarding processes; for example, when completing purchase orders and submitting invoices to Howdens for payment; and
- Be transparent and co-operative in the provision of relevant information where Howdens is conducting appropriate and proportionate due diligence on their ownership structure and financial/payment processes.

Competition

It is Howdens' policy to compete vigorously but fairly. Suppliers must comply with all applicable competition and antitrust laws and must not engage in any form of anti-competitive practices or behaviour in relation to their work with Howdens, such as:

- price-fixing - i.e. entering into agreements or understandings with competitors to fix selling prices or restrict sales;
- market-sharing - i.e. agreeing with competitors to share or allocate markets, customers or products, e.g. by agreeing to focus on different geographic areas, sale channels or product types;
- sharing pricing or commercially sensitive information - i.e. informing competitors of yours / Howdens' pricing intentions, or of other confidential information. The mere exchange of information can be illegal, as can simply listening without speaking up; and/or
- bid-rigging - i.e. secretly colluding with competitors in responding to customer tenders, rather than submitting transparent or independent bids.



Implementation of this Code of Conduct

The principles in the Code are simple: doing the right thing by our people, the environment and all those that depend on them is not only the right thing to do but it also makes good business sense.

We continue to adopt the SEDEX (Supplier Ethical Data Exchange) platform (www.sedex.com) as our tool of choice for gaining visibility and assurance over these principles through the four risk pillars adopted by SEDEX: labour standards, health & safety, business ethics, and environment practices. SEDEX is a mutually beneficial membership organisation that allows us to assess any risk by supplier site, while helping Suppliers to enhance and protect their corporate reputation globally.

As a principle of trading with Howdens, we require all Suppliers to inform us of the specific sites at which they are, or will be, manufacturing products for us, and each site must be registered on the SEDEX platform with the Self-Assessment Questionnaire (SAQ) fully completed. Visibility of supplier data must be granted to Howdens and, where relevant, SMETA (or equivalent) audits should be uploaded to support the submission.

An assessment of the information provided in the SAQ, and the risk indicators that SEDEX generate using the internal RADAR risk assessment tool, will be used to make an informed decision on the suppliers' site's ability to meet this Code of Conduct.

Monitoring and Reporting

We must ensure that we remain fully aware of our risk profile in the supply chain, hence mandating use of SEDEX. We will perform periodic monitoring of higher risk supply chain areas which may include regular SMETA audits, site visits or requests for information. These requests will be made with transparency as to the reason(s) for the request and information will be shared with our suppliers when deemed appropriate. Our compliance with this Code, our internal Corporate Social Responsibility Policy and commitment to supplier due diligence will be reported annually in our public Modern Slavery Statement.

Requirement to notify Howdens

Suppliers must promptly report to Howdens any potential or actual non-compliance with any of the principles in this Code, or of any applicable laws relating to their work with Howdens.

In addition, we require all Suppliers to notify Howdens of any breach or potential breach of local, national and international law governing the following:

- Labour including child labour
- Human Rights
- Environment
- Health and Safety
- Fire Safety
- Anti-corruption & bribery
- Product compliance

Notification must be made in writing to Howdens as soon as the breach (or potential breach) has been identified. On receipt of notification, Howdens reserves the right to perform an appropriate level of investigation.