

## **LUCY ELECTRIC CODE OF CONDUCT FOR SUPPLIERS**

Lucy Electric ("LE") is committed to following the highest standards of integrity and sustainability in its business activities. This means observing high ethical standards in all LE's procurement activities. LE's procurement ethics focus on zero tolerance of corruption, avoiding any conflict of interest and honest representation by Suppliers of their capabilities.

As such, this Code of Conduct for Suppliers has been prepared to provide a clear summary of LE's expectation of Suppliers in all procurement dealings, ensuring that internationally recognized procurement ethics are followed. Each Supplier must ensure transparency and accountability in all its activities.

Suppliers are strongly urged to familiarize themselves with this Code of Conduct to ensure continuing successful working relations with LE.

LE will continuously assess each Supplier's compliance with this Code, and any violations of this Code may jeopardize the Supplier's business relationship with LE.

### **Applicability of the Code of Conduct**

This Code of Conduct shall apply to all Suppliers, their group companies, suppliers and sub-contractors acting on behalf of them, which provide goods or services directly or indirectly to LE.

### **Policy on Corruption and Position on Conflict of Interest**

LE expects all Suppliers and potential suppliers to conduct their business in accordance with the highest ethical standards. Suppliers or potential suppliers must strictly comply with all rules and regulations on bribery, corruption and avoid unacceptable business practices. Suppliers are expected to observe the following and:

- Shall not directly or indirectly offer to any LE staff money, goods or a service as a consideration or in expectation of a favorable decision, information, opinion, recommendation, vote or any other form of favoritism;
- Shall not directly or indirectly offer, agree or promise to give to any LE staff any gratuity for the benefit of, at the direction of, or at the request of any staff of LE;
- Shall immediately inform LE's Head Office (Madeline Laxton Company secretary +44 1865 518 162) in the event that any staff of LE solicits, obtains or has made an attempt to obtain personal benefit for himself/herself or for any other persons;
- Shall immediately declare if any of the Supplier's Staff or Officers had or have any relative employed by LE that can potentially give rise to any conflict of interest. Failure to make such a declaration shall be construed as a conflict of interest and might result in the exclusion of the Supplier from on-going and future procurement activities or LE taking any other action as it deems fit .

### **Suppliers' Commitment**

LE believes that Suppliers' commitment to sound management systems is key to enriching the social and environmental well-being of LE's supply chain. Each Supplier warrants that:

- It will comply with all standards, rules, regulations and statutory requirements applicable to it and relating to the provision of the products/services to LE;
- It will not act in collusion with other suppliers or agents when participating in a bid and/or when providing goods and services to LE.
- It is a duly authorized / certified provider of the supplied products/services.
- It will only supply products that are fit for purpose and of the best quality;
- It possesses the necessary capabilities, equipment and suitable place of business to perform its obligations.
- It shall not contract out, or subcontract or outsource any portion of the products/services unless prior written consent from LE has been obtained;
- It shall maintain the highest standards of integrity at all times;.
- It shall adhere to internationally recognized provisions on Labour, Human Rights and Health & Safety.
- It shall not directly or indirectly employ a person under the age of 18.
- It shall not engage in any form of slave labour, forced labour or coercion and shall ensure its own supply chain does not engage in any form of slave labour, forced labour or coercion.
- It shall be committed to the protection of the environment, guard against usage of prohibited or restricted substances and responsibly dispose or recycle hazardous substances.
- It shall comply with all relevant policies notified by LE to the Supplier from time to time, including LE's Anti-Bribery Policy, Business Ethics Policy and Corporate and Social Responsibility policy found at <http://www.lucyelectric.com/en/terms-conditions/> and <http://www.lucyelectric.com/en/about/csr/>
- It shall ensure all of its sub-contractors and suppliers (which are used in the provision of services/products to LE) comply with this Code of Conduct.

### **Monitoring Compliance with the Code of Conduct**

To facilitate the monitoring of each Supplier's compliance with this Code of Conduct and the Supplier's responses to any self-assessment form completed by it, each Supplier shall:

- Develop and maintain all necessary documentation to demonstrate compliance with the Code of Conduct, all relevant standards and legislation, such documentation to be accurate and complete.
- Provide LE's representatives with access to relevant records, upon LE's request.
- Allow LE's representatives to conduct interviews with the Supplier's employees and with management separately.
- Allow LE's representatives to conduct announced and unannounced visits to any of the Supplier's sites.
- Respond promptly to reasonable inquiries from LE's representatives in relation to the implementation of the Code of Conduct.
- Ensure that its sub-contractors and suppliers allow LE and its representative's access to their sites to fulfill the requirements set out in this section
-

### **Sanctions**

A breach by any Supplier of the Code of Conduct may result in actions being invoked against that Supplier. The actions applied will depend on the nature and seriousness of the breach and the degree of commitment shown by the Supplier in observing its obligations under the Code of Conduct. The range of actions LE may take against the Supplier includes but is not restricted to the following:

- Issuing formal warnings – that the continued non-compliance may lead to more severe actions;
- Requiring the Supplier to disclose the breach to all LE group companies.
- Immediate termination of contract, without compensation.

### **Supplier Concerns**

LE has established secure communication channels to enable the Suppliers to raise their concerns confidentially and responsibly. If any Supplier has questions about the Code of Conduct, they should email [suppliermanagement@lucyelectric.com](mailto:suppliermanagement@lucyelectric.com). If a supplier wishes to report questionable behavior or possible violation of Code of Conduct, the Supplier is encouraged to contact LE at email [Madeline.Laxton@wlucy.com](mailto:Madeline.Laxton@wlucy.com)

LE will not tolerate any retribution or retaliation by any LE employee against other LE employees or, any retribution or retaliation by the Supplier or its staff against any member of the Supplier's staff, who has in good faith sought advice or has reported questionable behavior and/or a possible violation. Identities and contents of all information or complaints will be treated as strictly confidential.

### **Acknowledgment and Acceptance to be submitted together with a completed Supplier Self-Assessment Form**

This is to certify that I have read the LE Supplier's Code of Conduct. Having fully read and understood the requirements, I hereby commit myself and my Company to observe the LE Code of Conduct and to fully comply with all of its principles. I also certify that I am authorized by my Company to sign and accept this document on its behalf.

Supplier: \_\_\_\_\_  
Address: \_\_\_\_\_  
Representative: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_