## LV Supply Chain Code of Conduct LVL-WW-QA-PR-00983 Uncontrolled when printed



## LV SUPPLY CHAIN CODE OF CONDUCT

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#### LV SUPPLY CHAIN CODE OF CONDUCT

#### 1. PURPOSE

The LV Logistics Supply Chain Code of Conduct is aligned with the LV Group's Ethics Compliance Code of Conduct. These documents provide guidance to our supply chain partners who play an active role in helping us to achieve our mutual supply chain compliance and security goals. LV Logistics are committed to:

- Protecting the environment
- Protecting the employee
- A safe and healthy workplace
- Equality, Diversity and Inclusion
- Ethics and Compliance
- Community Involvement
- Compliance

#### 2. SCOPE

All LV Directors, Managers, Employees, Agent/Partners and Sub-contractors (all referred to in this document as 'Stakeholders'), working on our behalf are required to transact business activities in compliance with all laws and act in an ethical manner whilst maintaining the highest possible level of integrity.

Our aim is to only work with companies who understand and share our commitment to the principles outlined in this supply chain code of conduct.

#### 3. POLICY

All Stakeholders must adhere to LV Logistics' Supply Chain Code of Conduct. In carrying out its agreement(s) with LV Logistics, Stakeholders shall, in addition to complying with the standards set out in this code of conduct, comply with all applicable UK laws and regulations (and if applicable, the laws and regulations of any other jurisdiction where it operates) including but not limited to the laws and regulations relating to issues addressed in this code of conduct.

Competing standards shall be addressed as follows:

If there is a conflict between any applicable laws or regulations, the provisions of an agreement with LV Logistics and the provisions of this code, the Stakeholder shall meet the most stringent standard.

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### **Protecting the Environment**

We are a services-based company that, where possible, will reduce the use and reliance on natural resources to run our business. We are acutely aware of how our actions impact the climate. Our strategy is to build resilience and do more each year with fewer natural resources. We require our Stakeholders to consider their impact on the environment.

We would encourage all our Stakeholders to provide positive solutions to reduce the effects their products, services and delivery processes have on the environment.

As a minimum, Stakeholders must comply with all applicable environmental regulatory requirements and employ reasonable measures to mitigate any adverse impacts its products and services may have on the environment.

#### **Protecting the Employee**

We support the protection of human rights through our supply chain by requiring our Stakeholders to adhere to and provide evidence of compliance with the requirements of all local laws and regulations.

We comply with the Modern Slavery Act 2015 and require our Stakeholders to do the same.

- 0 Employment is freely chosen
- 0 Freedom of association and the right to collective bargaining are respected
- 0 Working conditions are safe and hygienic
- 0 Child labour must not be used
- 0 Living wages are paid
- 0 Working hours are not excessive
- 0 No discrimination is practised
- 0 Regular employment is provided
- No harsh or inhumane treatment is allowed

#### 3.3 A Safe and Healthy Workplace

We are committed to ensuring that the health and safety risks to our policyholders, employees and contractors, which arise from our operations, are reduced so far as is reasonably practicable.

#### 3.3.1 Health and Safety

Our Stakeholders must comply with all relevant health and safety laws and regulations, both in letter and in spirit, in all the countries in which they operate. We expect our Stakeholders to provide all their employees with adequate information and instruction

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on health and safety matters and to enable their employees to meet their responsibilities for the maintenance of a safe and healthy workplace.

#### 3.4 Ethics

We aim to establish mutually beneficial relationships with our Stakeholders, based on the same high ethical standards of openness, professionalism and honesty that we apply to all of our dealings. We expect Stakeholders to compete on the same basis with regard to the price and quality of their products and services. We operate a whistleblowing facility, for concerns in relation to conduct within LV Logistics, including:

- Adhere to all Non-disclosure Agreements.
- Criminal activity.
- Oper-Security.
- Behaviour that harms, or is likely to harm, the reputation or financial wellbeing of our Group.
- Any personal conflict of interest or even a perceived conflict of interest.
- Failure to comply with a legal or professional obligation.
- Oncerns relating to inappropriate relationships with either Government Officials or politically exposed persons.
- Stakeholders must not encourage, facilitate, or improperly influence someone to pay a bribe.
- Bribery, corruption and facilitating payments.
- Any form of TAX evasion.
- The use of products or materials that have been sourced either illegally or unethically.
- Deliberate concealment of any of the above.

### 3.4.1 Conflicts of Interest

Our Stakeholders must make us aware of any actual or potential conflicts of interest. Our Stakeholders should declare if it believes one of our employees or contractors has an interest or economic tie to the Stakeholder's organisation.

#### 3.4.2 Bribery and Corruption

The Stakeholder shall comply with all applicable laws, statutes, codes and regulations relating to the prevention of bribery and corruption (including, but not limited to, the Bribery Act 2010). To that end, the Stakeholder 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

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(c) any other unlawful or improper payments or benefits

## 3.5 Equality, Diversity and Inclusion

We commit to promoting a culture of enabling a supply chain that includes equality, diversity and inclusion. We would encourage suppliers to consider equality, diversity and inclusion in their decision making and supplier selections, including actively supporting supplier programmes that look to ensure a diverse employee base.

#### 3.5.1 Employee Discrimination

We require that the employees of Stakeholders should be protected from discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

#### 3.5.2 Gender Pay Gap

We require that the employees of Stakeholders should be protected from any discrimination or monetary inequality irrespective of gender.

## 3.5.3 Supply Chain

We would encourage and promote our Stakeholders to review the extent of equality, diversity and inclusion within their own supply chain and sourcing decisions. We believe our Stakeholders should work with diverse businesses and enact inclusive sourcing within their own organisations.

#### 3.6 Trade Compliance

Our suppliers must comply with all applicable laws and regulations, both in letter and in spirit, in all the countries in which they operate:

- All Stakeholders are expected to conduct business activities in compliance with all applicable import and export trade laws.
- Stakeholders shall transact business in compliance with Restricted Party Screening, Trade Sanctions, Financial Sanctions and Country Embargoes.
- Observe all export license-controlled requirements.
- Maintain suitable security arrangements aimed at preventing acts of theft, tampering with products, illegal access to transportation equipment and acts of terrorism.

#### 3.7 Community Involvement

We encourage our Stakeholders to have an active community involvement programme. Stakeholders should recognise the social imperatives of the communities in which they operate.

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#### 3.8 Human Rights

The Stakeholder 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 Organisation's Declaration on Fundamental Principles and Rights at Work from time to time in force in any part of its supply chain.

## 3.9 Data Protection and Information Security

The Stakeholder shall comply with all data protection laws and requirements (including the UK GDPR) when processing any personal data on LV Logistics' behalf.

The Stakeholder shall have in place appropriate measures to:

- (a) protect the integrity and confidentiality of information (including information belonging to or supplied by LV Logistics) held on its systems (which include physical and online or electronic systems); and
- (b) ensure that there is no unauthorised access of the information by third parties.

## 3.10 Self-monitoring and Reporting Breaches

All Stakeholders shall monitor their compliance with this code and shall report any breaches (actual or suspected) as soon as possible.

The Stakeholder shall not retaliate or take disciplinary action against any worker that has, in good faith, reported breaches of this code or questionable behaviour, or who has sought advice regarding this code.

#### 3.11 Breach, Remediation and Termination

Where LV Logistics becomes aware of a breach of this code by any Stakeholder or its workers, LV Logistics may either:

- (a) immediately terminate its business relationship with the Stakeholder (including any contracts); or
- (b) require the Stakeholder to produce a remediation plan specifying the actions that the Stakeholder will take that will lead to compliance with the code and present it to LV Logistics within 7 days of being requested to do so. If the Stakeholder fails to produce the remediation plan within this timeframe or fails to implement it within a reasonable time, LV Logistics may immediately terminate its business relationship with the Stakeholder (including any contracts). LV Logistics may in its

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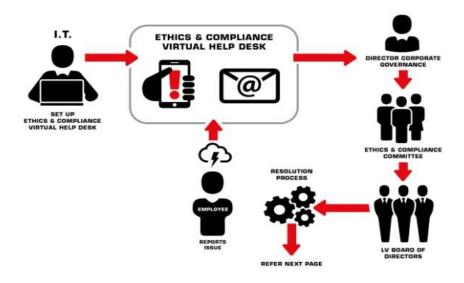
absolute discretion provide the Stakeholder with support and resources to assist with remediation. LV Logistics may also suspend the business relationship with the Stakeholder while remediation is ongoing.

#### Note:

This Supply Chain Code of Conduct contains general guidelines applicable to all LV Logistics' Stakeholders. The Agency Agreement and associated terms and conditions is the primary document however, if there is any inconsistency between this Supply Chain Code of Conduct and any other provision of a particular contract, Stakeholders must comply with whichever provision is stricter.



#### **ETHICS & COMPLIANCE VIRTUAL HELP DESK**



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Thank you for taking the time to read this Procedure. Please confirm your acceptance by completing the table below and returning to LV Logistics.

Name (Please Print):	
Legal Entity Name of Stakeholder:	
Position:	
Signature:	
Date of Signature:	

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