



## THE PHEASANT HOTEL

### CODE OF CONDUCT FOR SUPPLIERS

#### INTRODUCTION

The Pheasant has established standards of conduct for its business related practices that are contained within these Code of Conduct Guidelines for Suppliers (“Guidelines”). These Guidelines reflect our commitment to our values of humility, respect and honesty. The Pheasant expects all Suppliers to share and embrace these values together with commitment to legal and regulatory compliance.

Whilst Suppliers are independent entities from The Pheasant, the business practices and actions of a Supplier, when conducting business with or on behalf of The Pheasant, may significantly impact and reflect upon The Pheasant. Because of this, The Pheasant expects all Suppliers and their employees, agents, and subcontractors (“Representatives”) to follow our high ethical standards set forth in these Guidelines, while they are conducting business with us or on our behalf.

It is the responsibility of our Suppliers and their Representatives to understand and adhere to the expectations of The Pheasant. Suppliers should notify a member of management at The Pheasant if and when any situation develops that causes the Supplier or its Representative to operate in a way that may be in conflict with The Pheasant’s expectations or standards. The Pheasant may request the removal of any Supplier or Representative who behaves in a manner that we consider to be acting inconsistently with these Guidelines or any company policy of The Pheasant.

#### EXPECTED CONDUCT OF SUPPLIERS AND REPRESENTATIVES

While conducting business with or on behalf of The Pheasant, all Suppliers and Representatives are expected to conduct their business interactions and activities with integrity and in compliance with the applicable laws and regulations of their respective countries and the territories they are conducting business in. The Pheasant expects its Suppliers and Representatives to share its commitment to human rights and equal opportunity in the workplace.

The Pheasant is committed to providing a working environment free from sexual harassment and ensuring all staff are treated, and treat others, with dignity and respect. Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Sexual harassment or victimisation of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated.

In addition to the obligations under the Supplier’s agreement with The Pheasant, all Suppliers and Representatives are required to follow our ethical standards, which include expected conduct in the



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areas of regulatory compliance, business practices, and employment. A summary of these expectations is noted in this document.

### EXPECTED LEGAL & REGULATORY COMPLIANCE PRACTICES

**Suppliers and their Representatives are expected, at all times, to:**

- comply with all applicable laws and regulations and to maintain such authorisations and all other approvals, permits and authorities from any relevant regulatory authority as are required of it to provide the services and perform its obligations under any agreement in place with The Pheasant from time to time;
- conduct business in a manner and have adequate procedures and control in place to ensure compliance with all applicable:
  - antitrust and fair competition laws that govern the jurisdictions in which they do business;
  - anti-corruption laws of the countries in which they do business;
  - anti-bribery laws and not make any direct or indirect payments, proposed payments, facilitating payments, or offer something of value to another person or someone who is an employee of the government or a public agency with the intent to influence them;
  - anti-money laundering laws;
  - prevention of fraud or tax evasion laws;
  - data protection and privacy laws;
  - environmental laws and regulations; and
  - any governing or regulatory body requirement in respect safeguarding or otherwise;
- be honest and truthful in discussions with regulatory agency representatives and government officials;
- not conduct their business in a manner which would be against the laws of the UK; and
- comply with all applicable trade control laws that apply to many aspects of The Pheasant's operations

### EXPECTED BUSINESS PRACTICES

**Suppliers and their representatives are expected to:**

- honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy and security;
- comply with the UK GDPR (and where applicable the EU GDPR), Data Protection Act 2018 and any national data protection laws applicable to the countries in which they conduct business and The Pheasant's policies on data protection;
- comply with the intellectual property ownership rights of The Pheasant and others including but not limited to patents, trademarks, and trade secrets and use software, hardware and content only in accordance with their associated license or terms of use;



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- protect and responsibly use the physical and intellectual property of The Pheasant and only use such assets when authorised by The Pheasant to do so;
- where granted access, use information technology and systems (including e-mail) provided by The Pheasant solely for business-related purposes to The Pheasant and in accordance with applicable policies;
- comply with The Pheasant's requirements for maintenance of ID passes, passwords, confidentiality, and security and follow its privacy procedures as a condition of receiving access to The Pheasant's internal corporate network, systems, and buildings;
- use good judgment and moderation if offering gifts or entertainment to The Pheasant Team Members and associates;
- Suppliers and Representatives should never offer a bribe, kickback, or bartering arrangement for goods or services or any other incentive to a Team Member or associate of The Pheasant in order to obtain or retain business from The Pheasant;
- any gifts or entertainment given or received must be in compliance with the law, and must not violate The Pheasant policies;
- avoid an actual conflict of interest or even the appearance of a conflict of interest;
- avoid insider trading by buying or selling The Pheasant or another company stock when in possession of information about The Pheasant or another company that is not available to the investing public and that could influence an investor's decision to buy or sell stock; and
- create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.

### EXPECTED EMPLOYMENT PRACTICES

#### Suppliers and their Representatives are expected to:

- cooperate with The Pheasant's commitment to providing a workplace free of sexual, racial or other harassment and discrimination;
- treat employees and staff at The Pheasant with honesty and respect – harassment, abuse or disrespect of any kind will not be tolerated;
- provide a safe and healthy work environment and comply with all applicable safety and health laws, regulations and practices and health and safety policies and procedures in place at The Pheasant from time to time;
- cooperate with The Pheasant's commitment to good safeguarding practices;
- prohibit the use, possession, distribution, and sale of illegal drugs or alcohol while on property leased or owned by The Pheasant ;
- be committed to acting ethically and with integrity in all of its business dealings and relationships and not to endorse, enable or facilitate human trafficking or modern slavery of any kind in its business or supply chain;
- prohibit the use of forced or child labour whether in the form of indentured labour or otherwise in its



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- business and supply chains;
- comply with all local wage and hour and minimum working age laws and requirements; and
- maintain employee records in accordance with local and national regulations.

### **SITE RULES AND HEALTH & SAFETY COMPLIANCE**

#### **Suppliers and their Representatives are expected to:**

- comply with all site-specific rules, policies, and procedures at any location where they conduct business on behalf of The Pheasant, including The Pheasant sites and the sites of customers, suppliers, or other third parties;
- adhere to all health, safety, security, and environmental requirements applicable to the site, including personal protective equipment (PPE), restricted areas, and emergency procedures;
- follow all operational and security protocols, including sign-in/out procedures, identification requirements, and access restrictions, ensuring they do not disrupt normal site operations;
- respect the property, equipment, and personnel at all sites and avoid any actions that could compromise safety, security, or operational integrity;
- promptly report any incidents, accidents, near misses, or unsafe conditions to the appropriate site or The Pheasant contacts; and
- not take any action, or fail to take action, that could result in a violation of site rules or regulations, or that could expose The Pheasant, its customers, or suppliers to risk or liability.

### **REPORTING CONCERNS AND REQUESTING ASSISTANCE**

If a Supplier or Representative has a question or needs to report a problem or concern about a business practice or compliance, they are encouraged to report to, and work with, their primary contact at The Pheasant in resolving such business practice or compliance concern. We recognise, however, that there may be times when this is not possible or appropriate.

In such instances a Supplier or Representative can send an email to The Pheasant Legal & Compliance Department at [compliance@thepheasanthotel.com](mailto:compliance@thepheasanthotel.com)

The Pheasant encourages openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith. Good faith means that the individual coming forward with all of the information believes he or she is giving a sincere, truthful, and complete report.