



Tivoli Group Ltd. Supplier Code of Conduct

1. What is the Supplier Code?

2. Who does the Supplier Code apply to?

3. Conducting Our Business

- Health and Safety
- Sustainable Supply Chain
- Asset Management
- Conflict of Interest
- Anti-Bribery and Corruption
- Information Security and Data Protection
- Competition Law
- Social Media and External Communication
- Modern Slavery
- Respectful Treatment
- Environment

4. Complying with the Supplier Code



1 What is the Supplier Code?

- The Supplier Code sets out Tivoli’s expectations of ourselves and all of those who work with us.
- We expect supplier performance and standards of behaviours to be in line with this Supplier Code and any contractual obligations. We expect our suppliers to act in a manner that upholds our reputation, whether in delivering goods, services or works on behalf of Tivoli.
- The purpose of the Supplier Code is to formally communicate these requirements and expectations.

2 Who does the Supplier Code apply to?

- The Supplier Code applies to all Suppliers, Subcontractors, collectively referred to as our “suppliers”.
- Tivoli expects our suppliers to treat our colleagues, Clients and service partners with fairness and respect, in return we expect our colleagues and service partners to treat our suppliers in the same manner.

Health and Safety

Compliance with Health and Safety legislation is an absolute requirement for Tivoli. Risks to Health and Safety must be managed with suitable processes and procedures to ensure that the potential for harm is as low as reasonably practicable.

We operate safety critical activities at Tivoli and will never compromise our attention to the Health and Safety of people working on our behalf. We will constantly challenge ourselves, and our suppliers, in the pursuit of this.

Suppliers are expected to share our commitment and to deliver high standards in Health and Safety performance as a collective responsibility.

This includes demonstrating leadership in Health and Safety, complying with our requirements for the management of Health and Safety, and following the specific rules that are in place at both Tivoli and our Client sites.

Sustainable Supply Chain

Tivoli believes that responsible supply chain management is best for our business. We understand that creating and maintaining a sustainable supply chain enables us to maximise business opportunities, whilst managing our risks.

We recognise that the sustainability of our business and its supply chain is a key factor in our growth and are focused on our efforts to continually improve our supply chain and to develop innovative ways to exceed expectations.

We value our ability to support long term regional economic growth through our supply chain and our capacity to lead the way in delivering growth, while managing our social and environmental impacts. We expect our suppliers to adopt the same ethos.

Asset Management

Our approach to how we acquire, operate, maintain and dispose of our assets is by placing “Whole Life Value” at the heart of asset decision making, ensuring return on investment is maximised over the long term.

Effective Asset Management will enable us to provide best value for our business and its customers and be a responsible sustainable business through effective planning, informed decision making and good asset management practice.

We expect our suppliers to apply good asset management principles that take a whole life view of the assets they design, create or propose for Tivoli. Our suppliers have a key role in enabling our assets to deliver the required levels of safety, service and performance at best value and within acceptable levels of risk to the Business.

Conflict of Interest

A conflict of interest may arise where a supplier has an interest in a Tivoli colleague or a person closely connected to a colleague, and vice versa.

Tivoli seeks to avoid conflicts of interest in our business dealings, but if they do occur then we manage them appropriately.

Suppliers are expected to alert Tivoli of any conflicts of interest that may impact on the relationship between Tivoli and the supplier, even if this could prohibit the supplier from being able to conduct future work with us.

Anti-Bribery and Corruption

A bribe is a financial or other type of advantage that is offered or requested with the intention of inducing or rewarding improper performance of a function or activity. Highest standards of ethical conduct and integrity are critical and expected as part of all business operations.

Tivoli has a zero-tolerance approach to bribery, its position on its prevention and prohibition is in accordance with the Bribery Act 2010. Tivoli prohibits colleagues from offering, promising, giving, soliciting or accepting any bribe. Colleagues are also prohibited from accepting and offering any gifts or entertainment without prior management approval.

Information Security and Data Protection

The General Data Protection Regulations 2016 (GDPR) applies to organisations holding information about living individuals in both electronic and paper format and it governs how a company collects, uses, stores, shares and disposes of personal data.

Tivoli is committed to its compliance with information security and data protection policy and legislation, ensuring best practice when processing personal data about its customers and staff.

We expect all of our suppliers to make the commitment to comply with General Data Protection Regulations.

Competition Law

Highest standards of ethical conduct and integrity are critical in supporting the achievement of our business objectives.

Competition law applies to all organisations and seeks to preserve free, fair and effective competition between businesses for the protection of the consumer.

We are fully committed to complying with competition law at all times and will not take any action that could be in breach of competition laws.

Tivoli will embed competition law compliance in both our day-to-day and long-term strategic decision making.

Social Media and External Communication

Tivoli recognises that social media tools are increasingly used to promote Tivoli to colleagues, customers, the media and other stakeholders and to share personal opinions.

When engaging in external communications, including social media, you are taking responsibility for what you write and are encouraged to exercise good judgement and common sense.

When wanting to create Tivoli themed communications (e.g. press releases, social media posts, articles etc.) approval from Tivoli is required.

Modern Slavery

Modern Slavery is a crime and a violation of human rights. It takes forms such as slavery, servitude, forced and compulsory labour and human trafficking.

Tivoli has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

Wherever we work we ensure that nobody is exploited, we expect suppliers to share this commitment. This means Tivoli will refuse to do business with any individual, company or organisation that fails to uphold the standards and principles of basic human rights.

Respectful Treatment

Tivoli believes that all of its colleagues, suppliers and other third parties have the right to respectful treatment.

We will not tolerate discrimination, harassment or victimisation of any form within the workplace, and expects our suppliers to make the same commitment.

Environment

We seek to minimise and control the impact of our activities and implement a positive impact on the environment.

Tivoli will make best use of natural resources and minimise the environmental impact of our operations.

As a minimum Tivoli expects suppliers to maintain environmental and energy management systems which conform to relevant industry and environmental standards.

Suppliers must also comply with all statutory requirements and protect the environment, preventing pollution wherever possible.

Complying with the Supplier Code

Tivoli reserves the right, upon reasonable notice, to check compliance with the requirements of this Supplier Code.

We expect our suppliers to encourage their suppliers to adhere to the standards upon which this Supplier Code is based, as part of fulfilling their contractual obligations.

Tivoli reserves the right to terminate contracts in the event of material breach of the principles set out in this Supplier Code.