



SUPPLIER CODE OF CONDUCT

2Excel is a modern, responsible and honorable Company that has a strong ethical code. Working as it does across a diverse range of sectors, it has a wide range of suppliers. While we understand that our suppliers will have their own moral standpoints and their own codes of ethics, where our suppliers are working for us, we expect them to act in ways that do not compromise ours. Our Code of Ethics is [here](#).

As an aviation and aerospace services business, we are only too aware of how our activities impact the environment, climate and society. Many of our activities support the National Interest and the common good: increasing security, saving lives, cleaner seas and saving trees. We are proud of why we operate and of our demonstrable commitment to mitigating the negative impacts of our operational activities. We care about how we act with our communities, partners, stakeholders, suppliers and the environment. Operating as a highly integrated business with a complex supply chain, we rely on our suppliers to help us to deliver our services and we strive to work with like-minded businesses. It follows that our negative impact mitigations and controls extend to our supply chain.

This document, our Supplier Code of Conduct, sets out the expectations we have for our suppliers. Its purpose is to clarify and safeguard the relationships between us and our suppliers by defining the standards that we expect our suppliers to operate to. This is to help us ensure, as much as we can, that our sub-contracted work is socially and environmentally responsible, ethical, and that workers in our supply chain are treated with fairness, respect and dignity.

We expect our suppliers to have processes in place to comply with and maintain these standards and to be able to provide us with evidence to support that.

1. Legal Compliance

We expect our suppliers to comply fully with all current labour, ethical, employment, environmental protection, health and safety, data privacy, tax compliance, anti-bribery and anti-corruption laws and regulations of the countries in which they operate.

2. Import, Export and Trade Compliance

We expect our suppliers to comply with all applicable regulations concerning import and export licences, consents and restrictions in connection with any goods and/or services transactions for military, dual or commercial use including transactions in so-called 'sensitive countries' and/or with legal and natural persons subject to restrictive measures and/or sanctions.

3. Human Rights and Labour Practices

We expect our suppliers to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes including the Modern Slavery Act 2015 and all other laws prohibiting forced or compulsory labour, child labour, bonded labour or prison labour and, to have zero tolerance for any form of modern slavery, forced or child labour in their supply chains. We expect them to uphold fundamental human rights and to treat their employees with fairness, respect and dignity. As a minimum, we expect our suppliers to ensure their employees' compensation, hours worked, sickness and time off are in accordance with their local laws and regulations.

We expect our suppliers to have or to establish grievance mechanisms for their employees and partners to be able to report concerns confidentially and to provide safe channels for their workers to raise legal or ethical concerns without fear of retaliation. Their employees should have access to remedial processes to address issues.



4. Health and Safety

We expect our suppliers to provide a safe and healthy working environment for their employees with appropriate safety measures. We expect them to provide training and protective equipment to militate against accidents and occupational hazards and to comply with all the relevant health and safety regulations in all the countries in which they operate.

5. Equality, Diversity and Inclusion

We expect our suppliers to promote equality, diversity and inclusion within their workforces, respecting and valuing the individual differences of their staff. As a minimum, we expect our suppliers to protect their staff from, and provide a working environment free from, all forms of discrimination, harassment and bullying on the grounds of age, disability, gender, gender identity, gender reassignment, pregnancy or marital status, civil partnership, race, colour, caste, creed, ethnicity or ethnic origin, religion or belief, sex, sexual orientation or preference.

6. Sustainability

2Excel is committed to achieving net zero by 2050. Our Sustainability Policy is [here](#). We expect our suppliers to have their own documented climate protection goals, pathways and measurable milestones to achieve them. It follows that we expect our suppliers to understand the Sustainability impacts of their business activities and to mitigate the negative effects that their operations may have. We expect them to collaborate with us in achieving our up-stream and down-stream Sustainability objectives (accepting that achieving absolute Sustainability will be a long-term process of continuous improvement). We expect suppliers to comply with environmental laws and regulations, to employ socially and environmentally responsible practices and to seek to continuously improve their environmental performance.

7. Anti Bribery and Corruption (ABC)

In line with regulatory and ethical business codes of practice and, specifically, our own Code of Ethics, we expect our suppliers to maintain the highest standards of honesty and integrity. We deem bribery, corruption or unethical behaviour a material breach of contract.

Gifts and entertainment can create perceptions of bribery or favouritism. Suppliers are expected to adhere to a stringent ethical framework to ensure these gestures comply with the law and their culture of integrity and honesty and responsible, ethical conduct in their business activities. Steering clear of their use during business negotiations to preserve fair competition, suppliers are expected to record all instances of courtesies given or received over the value of £100 (one hundred pounds).

8. Anti-Trust, Anti-Competition and Conflicts of Interest

Compliance with relevant laws, such as avoiding price fixing or market allocation, is essential in pursuit of transparent and equitable business environments. We promote open competition and integrity. We demand the same commitment from suppliers, disallowing any anti-trust or anti-competitive behaviours.

We expect suppliers to steer clear of conflicts of interest with 2Excel's employees and the organisation as a whole, including through family or business relationships. Where potential conflicts of interest do exist, clarity, openness and transparency are essential to negate downside risks. Therefore, it is expected that suppliers shall reveal and notify 2Excel promptly of any real or perceived conflicts of interest and take adequate organisational and/or individual mitigation actions.



9. Data Protection and Privacy

We expect our suppliers handling personal data to comply with the UK Data Protection Act 2018 as a minimum, ensuring information belonging to us, our existing and prospective customers, our other suppliers, employees and/or other third parties is neither used nor disclosed except as authorised by us and/or the Government. This includes implementing measures to safeguard the integrity and security of digital systems. Suppliers are expected to inform us immediately of any actual breach, or risk of breach, of data, information or cyber security.

10. Quality and Product Safety

We expect our suppliers to deliver products and services that meet quality and safety standards compliant with relevant product and service safety regulations and good industry practice (GIP).

We expect our suppliers to use GIP and quality goods, materials, standards and techniques to ensure that all goods and materials supplied, used or transferred to 2Excel are free from defects in workmanship, installation and design, as well as being free of counterfeit and/or replica parts.

We expect our suppliers to provide products made from materials, including constituent minerals that are sourced responsibly, which shall be proven through appropriate due diligence. We also expect our suppliers to support efforts to eradicate the use of any minerals which directly or indirectly finance or benefit armed or unarmed groups that are perpetrators of serious human rights abuses.

11. Payment

Abiding by payment terms and codes both strengthens business connections and bolsters financial resilience throughout the whole supply chain. Therefore, we commit to timely payment. We expect our suppliers to extend the same to their supply chain to promote mutually beneficial relationships.

12. Communications

Many of our head-contracts involve sensitive information and, therefore, we may flow down constraints on supplier communications in our contractual terms. Where not specified, save for supplier staff and professional advisers who need to know, our written approval, which may amend the communication but will not unreasonably be withheld, is required for any form of supplier communications regarding 2Excel, its work, its customers and/or the purchase order and/or contract.

13. Reporting and Accountability

We expect our suppliers to comply with all applicable laws and regulations in all of the countries in which they operate, to confirm to us that they do and, through their compliance monitoring functions, be able to prove it. Where there is any violation of local laws and regulations or the terms of this Supplier Code of Conduct, intentional or otherwise, we expect our suppliers to report that to us promptly and work with us to mitigate the consequences and the chances of any recurrence.

We reserve the right to audit suppliers regarding compliance with this Code of Conduct. Audits may comprise facility inspections, employee interviews, reviews of supplier records and/or business practices conducted by 2Excel's staff. If an audit identifies a non-conformity, we expect the supplier to act promptly to correct the situation to our satisfaction.

14. Supply Chain Responsibility

We encourage our suppliers to communicate and promote these principles throughout their own supply chains, flowing down our expectations to their subcontractors and suppliers working on or for our contracts.



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