

## SUPPLIER CODE OF CONDUCT

Silentnight are the UK's most Trusted Sleep Brand and this code of conduct sets out the company's minimum requirements for our supply chain.

Suppliers are selected and evaluated, which share our commitment to doing responsible business by protecting the natural environment, promoting human rights and personal health and safety as well as ensuring compliance with the growing set of regulatory obligations.

All suppliers and partners (including contractors) that manufacture, finish, pack or otherwise handle goods or perform services for Silentnight must comply with this code of conduct and all applicable laws and regulations in the countries and territories in which they operate.

Suppliers and manufacturing partners are also responsible for distribution, education and ensuring compliance of this code of conduct and all relevant laws and regulations with their business partners and upstream supply chains.

Our Supplier Code of Conduct contains a set of Environmental, Social and Governance (ESG) related principles and regulatory requirements as follows:

### Environmental

Suppliers should monitor and reduce the environmental impact of their operations. At a minimum, efforts should be made to:

- Monitor and reduce carbon emissions
- Use or procure renewable energy
- Monitor and reduce water consumption
- Eliminate or reduce the use of single use plastics and packaging
- Prevent the use and discharge of toxic chemicals
- Respect the humane treatment of animals
- Avoid materials associated with biodiversity loss or pollution
- Monitor and reduce process waste by more efficient use of raw materials and recycling to avoid landfill
- Adopt eco-design principles to facilitate a more circular economy

### Chemical Compliance

#### UK REACH – REACH EU (European Union) Regulation

Suppliers must ensure that they meet the relevant duties under both UK and EU REACH if your business is supplying or purchasing substances, mixtures, or articles.

#### POPs – Persistent Organic Pollutants Stockholm Convention

Suppliers that use chemicals in the manufacture of their products should fully comply with the requirements of the Stockholm Convention on POPs regulations.

Silentnight will annually, request written confirmation of compliance with both REACH Regulation and POPs.

## Social

### **Modern Slavery**

Silentnight operates a zero-tolerance policy in respect of modern slavery and human trafficking and is fully committed to acting ethically and with integrity at our locations and in all our business dealings and relationships in order that customers can purchase our products with confidence.

### **Ethical Trading**

We require all our suppliers to conform to the International Ethical Trading Code.

Silentnight will annually, request written confirmation of compliance with both Modern Slavery and Ethical Trading.

### **Child Labour and Remediation**

Silentnight is committed to preventing and addressing the use of child labour in our supply chain. We will not engage in or condone the unlawful employment or exploitation of children in the workplace or the use of forced labour in our own operations or supply chain.

Suppliers are also required to monitor their own supply chains, including labour providers.

We expect suppliers to undertake credible due diligence and monitor their operations to ensure that their sites and supply chains are free from child labour.

### **Diversity, Equality and Inclusion**

Suppliers are encouraged to develop and promote inclusive cultures where diversity is valued, and all employees can contribute and reach their full potential.

## Governance

### **Bribery and Corruption**

When conducting business with Silentnight, supplier shall fully comply with any applicable anti-bribery or anti-corruption laws and regulations.

The Bribery Act 2010 came into force on 1st July 2011, and makes it a criminal offence for an employee or 'associated person' acting for, or on behalf of, the Company to offer, promise, give, request, receive or agree to receive a bribe; or to offer, promise or give a bribe with the intention of influencing a third party in the performance of their duties. Involvement in bribery or corrupt activities can result in both the Company and individuals being liable for a criminal prosecution, and penalties are severe — they include up to 10 years imprisonment and fines for an individual and/or unlimited fines for a convicted company.

It is our company policy to conduct all business transactions in an open, honest, ethical, and legal manner and to require the highest standards of integrity from suppliers.

### **Gifts and Hospitality**

We require our suppliers to use good judgment when exchanging business courtesies. Any gifts will be donated to charity or raffled for charity.

Giving business courtesies to Silentnight personnel, if permitted at all, should be modest and infrequent and occur in the normal course of business. Suppliers must never give anything to gain an improper business advantage.

### **Competition**

Suppliers shall conduct their business dealings in line with all applicable competition laws and regulations.

Suppliers must not discuss or agree with competitors about pricing, sharing of prohibited / sensitive market data or similar activities.

### **Money Laundering**

Supplier must comply with applicable laws prohibiting money laundering. Supplier shall not enter into any arrangement that facilitates or may cause Silentnight to be directly or indirectly involved in Money laundering.

### **Trade Compliance**

Suppliers must comply with all international trade laws and regulations. Suppliers must avoid doing anything that would place supplier or Silentnight Group in violation of such laws and regulations.

### **Conflicts of Interest**

"Conflict of interest" means any circumstance, transaction or relationship directly or indirectly involving supplier in which the private interest of any director, employee, representative or agent of Silentnight, or of supplier, improperly interferes, or appears to improperly interfere with the interests of Silentnight. If a supplier becomes aware of an actual or potential conflict of interest that may impact its work for or on behalf of Silentnight, it shall promptly notify Silentnight. Depending on the circumstances, supplier may be required to put in place appropriate measures to manage the conflict of interest.

## Additional Criteria

### Health and Safety

Suppliers must be focused on preventing accidents and cases of work-related ill health by managing the health and safety risks in the workplace. Clear instructions and information, along with adequate training must be provided to ensure employees are competent to carry out their work.

Supervision should be provided to ensure that control measures in place to protect against risk, are being properly used, maintained, and monitored.

Suppliers must maintain healthy and safe working conditions, provide, and maintain plant, equipment, and machinery, and ensure safe storage/use of substances.

Occupational health services should be provided to meet legal requirements and to promote a healthy workforce. Facilities for employees should be such that an individual's dignity and hygiene are safeguarded.

### Data Protection

Any supplier receiving personal or confidential information from Silentnight is expected to maintain reasonable and appropriate physical, technical, and administrative safeguards that meet industry standards and applicable statutory, regulatory, and standards bodies/industry recognized requirements, such as ISO 27001. This includes the confidentiality of information contained on any network and to protect all of the foregoing from unwarranted, accidental or unauthorized access, use, disclosure, modification or destruction. Silentnight may require the Supplier to complete a Supplier Security Questionnaire to document the standards and controls in place.

In the case of Unauthorized Access to Silentnight data, the supplier will, at supplier's sole cost and expense immediately upon discovery, notify Silentnight of any unauthorized access to Silentnight data by emailing [infosec@silentnight.co.uk](mailto:infosec@silentnight.co.uk). The supplier will also use reasonable precautions to prevent a recurrence of a Breach of Security and take all reasonable and appropriate action to mitigate any potential harm related to a Breach of Security, including any reasonable steps requested by Silentnight.