

Supplier code of conduct

1. Introduction

1.1. Overview

- 1.1.1. Cancer Research UK (CRUK)'s Supplier Code of Conduct is a set of mandatory standards that all suppliers of CRUK must comply with, along with all applicable laws as a minimum. They concern Business Ethics, Labour and Employment Practices and Environment. Failure to adhere to the law and the Supplier Code of Conduct may constitute a breach of contract.
- 1.1.2. The following standards have been created based upon and/or reference international legislation, requirements and guidance, which include but are not limited to the:
 - Ethical Trading Initiative (ETI) Base Code
 - UN Guiding Principles on Business and Human Rights (UNGPR)
 - OECD Guidelines for Multinational Enterprises (MNE)
 - International Labour Organisation (ILO) Core Conventions and Recommendations
 - UK Modern Slavery Act 2015

1.2. Our expectations of suppliers

- 1.2.1. The manufacture of goods and provision of services to CRUK are carried out in compliance with the above standards, as well as any applicable law, which apply throughout the whole supply chain including sub-suppliers and subcontractors. Suppliers must ensure all laws and regulations are complied with in the countries in which the supplier and their supply chain operates. Where the provisions of law and regulations in a different country address the same subject as the standards referenced herein, suppliers must apply that provision which affords the greater protection.
- 1.2.2. Suppliers must notify CRUK of any actual or suspected breaches of these standards within a maximum of 14 business days of becoming aware. If remediation is required, the supplier will devise and inform CRUK of their corrective action plan to resolve the breach.

1.3. Due diligence

- 1.3.1. Suppliers must be able to demonstrate that they have sufficient processes to ensure the following minimum standards are being met in the suppliers' own operations and passed on and upheld across the supply chain. This could include but is not limited to: policies, risk assessment, due diligence and corrective action plans.
- 1.3.2. CRUK may ask new or existing suppliers to evidence this by requesting further information. This could include, but is not limited to, the completion of a questionnaire or providing a third-party manufacturing site social or environmental audit.
- 1.3.3. Where relevant, suppliers must grant those representing Cancer Research UK any requested information and right of access, at all reasonable times to all areas of all production facilities, at any level of the supply chain to ensure compliance with this Code. Cancer Research UK or those representing Cancer Research UK reserve the right to visit a supplier site without prior announcement, i.e. through an unannounced assessment.

- 1.3.4. A lack of transparency, refusal to respond fully or significant delay in responding to due diligence requests, or non-resolution of critical issues, may impact your continued working relationship with CRUK.

2. Business Ethics

2.1. Fraud, theft, bribery and corruption

2.1.1. Fraud, theft, bribery and corruption is strictly prohibited:

- Fraud: involves dishonestly making a gain, or causing a loss, through false representation, failing to disclose information and/or the abuse of position.
- Bribery: relates to any financial, or other, advantage which is intended to induce or reward the improper performance of a business activity or a private function. Bribery involves offering, promising or giving someone a bribe or requesting, receiving or agreeing to receive a bribe.

2.1.2. Suppliers must comply with all applicable laws relating to anti-bribery and anti-corruption including but not limited to the Bribery Act 2010 (as amended or updated from time to time) and comply with any applicable anti-bribery code relating to its industry, as may be updated by the relevant industry body from time to time.

2.1.3. Suppliers must have and maintain in place their own policies and procedures, including but not limited to adequate procedures under the Bribery Act 2010, to ensure compliance with all applicable anti-bribery and anti-corruption laws.

2.2. Reporting concerns

2.2.1. All workers are to be provided with a means by which to confidentially raise their concerns about any of these requirements.

3. Labour and employment practises

3.1. Employment is freely chosen

3.1.1. There is no forced, bonded or involuntary prison labour.

3.1.2. There is no use of modern slavery including child and forced labour and human trafficking.

3.1.3. Compliance with applicable modern slavery legislation including but not limited to the Modern Slavery Act 2015 (as from time to time amended or modified).

3.1.4. No recruitment fees or related costs are paid by workers.

3.1.5. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

3.1.6. No sub-contracting or recruitment agencies are used without prior permission.

3.2. Freedom of association and the right to collective bargaining

3.2.1. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

3.2.2. The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

3.2.3. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

- 3.2.4. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3.3. Working conditions

- 3.3.1. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.3.2. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3.3. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.3.4. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.3.5. The company observing the code shall assign responsibility for health and safety to a senior management representative.

3.4. Child labour

- 3.4.1. There shall be no recruitment of child¹ labour.
- 3.4.2. Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
- 3.4.3. Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 3.4.4. These policies and procedures shall conform to the provisions of the relevant ILO standard.

3.5. Fair wages

- 3.5.1. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 3.5.2. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 3.5.3. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

3.6. Working hours

- 3.6.1. Working hours must comply with national laws, collective agreements, and international labour standards and the following provisions, whichever affords the greater protection to workers.
- 3.6.2. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week².

- 3.6.3. All overtime shall be voluntary. Overtime shall be used responsibly and in line with applicable legislation, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment.
- 3.6.4. The total hours worked (including overtime) in any 7 day period must not exceed 60 hours.
- 3.6.5. Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

3.7. Discrimination

- 3.7.1. There is no discrimination (e.g. in hiring, compensation, access to training, promotion, termination or retirement) on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation or any other protected characteristics as defined by the UK Equality Act 2010 (as from time to time amended or modified) and any other applicable law.

3.8. Regular employment

- 3.8.1. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

3.9. No harsh or inhumane treatment is allowed

- 3.9.1. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

4. Environmental standards

4.1. Environmental performance

- 4.1.1. Continually seek to improve environmental performance, at all levels of the organisation and, where appropriate, of its supply chain, by encouraging such activities as:
 - 4.1.1.1. Adoption of technologies and operating procedures in all parts of the organisation that reflect standards concerning environmental performance in the best performing part of the organisation.
 - 4.1.1.2. Development and provision of products or services that have no undue environmental impacts; are safe in their intended use; reduce greenhouse gas emissions; are efficient in their consumption of energy and natural resources; can be reused, recycled, or disposed of safely.
 - 4.1.1.3. Promoting higher levels of awareness among customers of the environmental implications of using the products and services of the enterprise, including, by providing accurate information on their products (for example, on greenhouse gas emissions, biodiversity, resource efficiency, or other environmental issues).
 - 4.1.1.4. Exploring and assessing ways of improving the environmental performance of the

enterprise over the longer term, for instance by developing strategies for emission reduction, efficient resource utilisation and recycling, substitution or reduction of use of toxic substances, or strategies on biodiversity.

5. Products, materials and ingredients

5.1. Timber

- 5.1.1. Must meet relevant laws including: the European Union Timber Regulation (EUTR); The Timber and Timber Products Placing on the Market Regulations (UKTR); The Forest Law Enforcement, Governance and Trade Regulations 2012 (UK FLEGT); and the Environment Act 2021 (all as amended, updated or replaced from time to time as the case may be).

5.2. Packaging

- 5.2.1. Must fulfil relevant requirements under the Extended Producer Responsibility (EPR) regime under UK law, including but not limited to requirements relating to the UK Plastic Packaging Tax.

¹ Child: Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.

² International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.