



**Delta
Impact**

part of the Easby Group

Delta Impact Supplier Code of Conduct

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1 General

Delta Impact Code of Conduct for Suppliers (hereafter called 'The Delta Code') sets requirements for suppliers and is based on the UN Global Compact, the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises as well as other international standards, norms, and guidelines (see 'References' for a full list). Delta Impact (hereafter called Delta) requires its suppliers to comply with the Delta Code or an equivalent standard, agreed together with Delta, when doing business with Delta.

1.1 Compliance with Laws and Regulations

Suppliers shall comply with all applicable laws, rules, and regulations in the countries where they operate. Delta expects suppliers to meet the more stringent requirements between the Delta code and applicable laws and regulations and to collaborate with their own suppliers and subcontractors towards that goal. In case of contradictions between the Delta Code and applicable laws and regulations Delta expects the supplier to inform Delta.

1.2 Commitment to Continuous Improvement

Delta recognizes that suppliers will be at various stages of maturity and commits to collaborating with suppliers to achieve continuous improvement. If Delta finds that a supplier is not meeting the requirements and expectations set out in this Code of Conduct for Suppliers, Delta may offer guidance specifying which issues need to be corrected or improved. The supplier should then take corrective actions promptly and commit to showing progress. Delta also encourages suppliers to participate in initiatives aiming to raise the standard of an entire sector or across sectors, where applicable

1.3 Consequences in Case of Violations

Suppliers shall address any violations of the Delta Code or equivalent standards that come to their knowledge and take appropriate actions. Depending on the severity of the violation appropriate actions could be a request for corrective measures. Persistent failure to comply with the Delta Code or repeated and unjustified refusal to provide the required information may also result in suspending or terminating the supplier's activities with Delta.

1.4 Due Diligence and Transparency

1.4.1 General

Delta shall have the right to conduct due diligence by regularly and systematically identifying and assessing human and labour rights, environment and business ethics related risks and impacts in its supply chain and to use this information to avoid or mitigate to ensure that it sources responsibly. Delta expects suppliers to allow Delta, or a third party authorized by Delta and acceptable to the supplier, to conduct audits and assessments of the supplier's operations relevant for the Delta Code, including but not limited to the supplier's facilities. At the supplier's request, the parties involved in any such audit shall enter into a confidentiality agreement regarding the circumstances disclosed in the audit or assessment. Delta also expects its suppliers to conduct appropriate due diligence in their own operations and supply chain.

1.4.2 Conflict-Affected and Other High-Risk Areas

Suppliers shall assess whether their own operations, their suppliers or sub-suppliers are located or source from conflict-affected or other high-risk areas. Where operations or sourcing from conflict-affected or other high-risk areas are identified, the supplier should adapt enhanced due diligence measures suited to the specific contexts and should take steps to monitor its business relationships, business transactions, flows of funds and resources to ensure that they are not linked to providing funding or support to armed actors who may benefit from revenues generated by the sale of such goods and services.

1.4.3 Minerals from Conflict-Affected Areas

Suppliers of tin, tungsten, tantalum, gold, and other conflict minerals shall make a reliable determination of the origin and source of such minerals. In the case these minerals are produced in or sourced from conflict affected areas an enhanced due diligence mechanism shall be undertaken by the supplier.

1.4.4 Management Systems and Monitoring

Suppliers should have adequate management systems and controls in place to ensure compliance with the Delta Code or agreed equivalent standards. The functioning and quality of the supplier's management system should be in proportion to the size, complexity, and risk environment of the supplier's business. Suppliers should secure and monitor that their own suppliers and sub-suppliers comply with the Delta Code or, where applicable, their own equivalent code of conduct.

2 Human Rights and Labour Rights

2.1 General

Delta expects its suppliers to respect internationally proclaimed human rights. Requirements related to supplier personnel in the Delta Code shall apply to all the supplier's workers including temporary, migrant, student, and contract workers as well as direct employees. All workers shall have the right to enter and to terminate their employment freely. Suppliers should take measures to avoid causing, contributing, or being linked to negative human rights impacts.

2.2 Indigenous People

Suppliers shall respect the rights of Indigenous and tribal peoples and their social, cultural, environmental, and economic interests, including their connection with lands and other natural resources. Suppliers should follow the principles of free, prior, and informed consent, and participation to obtain broad-based consent of Indigenous and tribal peoples in their activities.

2.3 Community Engagement and Development

Suppliers shall respect the rights, interests, and development aspirations of affected communities during significant changes of supplier's normal operations. Community engagement should be conducted in an inclusive, equitable, culturally appropriate, gender-sensitive, and rights-compatible manner.

2.4 Child Labour and Young Workers

Suppliers shall work against all forms of child labour. Suppliers should not participate in or benefit from any form of child labour. Suppliers shall not employ children below the minimum age of employment or the age for completing compulsory education in that country, whichever is higher. Suppliers shall not employ any workers under the age of eighteen to perform any work that is defined in national law as hazardous.

2.5 Use of Security Personnel

Suppliers shall ensure that all security personnel, including contracted security personnel, respect the human rights and dignity of all people and in case of threat use reasonable force, proportional to the threat.

2.6 Modern Slavery and Forced Labour

Suppliers shall not participate in, or benefit from any form of forced labour, including bonded labour, involuntary prison labour, slavery, servitude, or work performed under the menace of a penalty or coercion. All forms of modern slavery are unacceptable to Delta.

2.7 Working Conditions

2.7.1 Hours of Work

Suppliers should ensure that normal working hours and overtime working hours are within the limits permitted by applicable laws and regulations or agreed to in relevant collective agreements.

2.7.2 Wages, Leave and Benefits

Suppliers shall pay a wage including benefits that meets basic needs and strive for a discretionary income in compliance with applicable laws and/ or relevant collective agreements as applicable. Correspondingly workers shall be compensated for overtime at pay rates greater than regular hourly rates.

2.7.3 Health and Safety

Suppliers shall provide a safe and healthy environment across all locations where work is undertaken and when the supplier is providing housing facilities to its personnel. All work shall be preceded by and be based on documented adequate risk management with implemented controls. This shall include physical, social, and organizational health risks. Risks shall be reduced according to the following hierarchy: Elimination, substitution, engineering controls, administrative controls, and as a last alternative, personal protective equipment.

2.7.4 Freedom of Association and Collective Bargaining

Suppliers shall recognize and respect the rights of employees to freely associate, organize and bargain collectively, if they so wish to. In situations where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations, Delta expects suppliers to allow alternate forms of worker representations.

2.7.5 Non-Discrimination

Suppliers shall not practice any form of discrimination in hiring and employment practices. Illegitimate grounds for discrimination include but are not limited to race, colour, gender, age, language, property, nationality or national origin, religion, ethnic or social origin, caste, economic grounds, disability, pregnancy, belonging to an Indigenous people, trade union affiliation, political opinion, sexual orientation.

2.7.6 Grievance Channels and Remediation Mechanisms

Suppliers should make available appropriate grievance mechanisms that are available to personnel and interested parties, including affected communities, to make comments, recommendations, reports, or complaints concerning the workplace, the environment or supplier's business practices. Suppliers shall have routines for dealing with harassment and communicate that any form of harassment is unacceptable and must be reported.

3 Environment

3.1 General

Delta expects its suppliers to manage their operations responsibly in relation to environmental risks and impacts, to adopt a precautionary approach, and to have a life cycle perspective in their business operations. Resources such as water and energy should be used efficiently and impacts on biodiversity as well as services provided by our eco-systems should be minimised.

3.2 Environment Legislation

Suppliers shall obtain and maintain all required permits and licenses and comply with the operational and reporting requirements of such permits and licenses.

3.3 Environment Protection

Suppliers shall endeavour to avoid or reduce any waste or emissions because of their business activities. Suppliers should use efficient technologies which aim to reduce the environmental impact as much as possible. Delta expects suppliers to adopt a precautionary approach and where applicable respect the polluter pays principles. Suppliers shall manage hazardous substances responsible and where possible hazardous substances should be substituted for less hazardous.

3.4 Environmental Management Systems

Suppliers whose activities have an environmental impact shall have a structured and systematic approach to take environmental aspects into account that includes establishing suitable management systems to improve environmental performance, setting targets, and performing follow-ups.

4 Business Integrity

Delta expects its suppliers to conduct business in compliance with all applicable national and international laws and regulations and adhere to internationally agreed standards of business ethics.

4.1 Professional Behaviours

Suppliers are required to ensure they behave appropriately and professionally when dealing with any employee or representative of Delta. In particular Suppliers must ensure their representatives do not discriminate against, harass, bully or intimidate any Delta representative, or attempt to do so. In particular the Supplier shall ensure behaviours of all representatives are in line with the expectations detailed in the Equality Act 2010 and any subsequent amendments.

4.2 Trade Regulations & Sanctions

Suppliers are required to comply with any import and export control laws and regulations, including embargoes, sanctions and anti-boycott rules which are applicable to them, and to ensure that no action of theirs could place at risk Easby's compliance with such rules and regulations when importing or reselling the provided product.

5 Anti-Corruption

Suppliers shall not engage in or tolerate any form of corruption, bribery, money laundering, extortion, or embezzlement. Suppliers shall not offer or accept any benefits or other means to obtain any undue or improper advantage. Such improper benefits may comprise cash, non-monetary gifts, pleasure trips or services and amenities of any other nature.

6 Conflict of Interests

Suppliers shall avoid conflicts of interest that may compromise the supplier's credibility in the Delta group or other exterior parties' confidence in the Delta group.

7 Competition Law

Suppliers shall respect and comply with all applicable competition laws and regulations, including an obligation not to exchange commercially sensitive and strategic information with competitors or to enter into anticompetitive agreements with any business partner.

8 Protection of Intellectual Property Rights and Confidential Information

Suppliers shall respect Delta's intellectual property rights and protect Delta's information by safeguarding it against misuse, theft, fraud, or improper disclosure.

9 References

1. 1948 Universal Declaration of Human Rights (UDHR) www.un.org/en/documents/udhr/index.shtml
2. Children's Rights and Business Principles <https://www2.ohchr.org/english/bodies/crc/docs/CRC.C.GC.16.pdf>
3. International Labour Organization, specifically the documents listed below: <http://www.ilo.org> • Declaration on Fundamental Principles and Rights at Work from 1998 • Forced Labour Convention (C.29-1930) • Abolition of Forced Labour Convention (C.105-1957) • Minimum Age Convention (C.138-1973) • Prohibition and Immediate Elimination of the Worst Forms of Child Labour Convention (C.182-1999) • Equal Remuneration Convention (C.100-1951) • Discrimination (Employment and Occupation) Convention (C.111-1958) • Freedom of Association and Protection of the Right to Organise Convention (C. 87- 1948) • Right to Organise and Collective Bargaining Convention (C. 98-1949) • Guidelines on Occupational Safety and Health (ILO-OSH-200)
4. ISO14001 <http://www.iso.org/iso/iso14000>
5. ISO 26000:2010 Guidance on Social Responsibility <http://www.iso.org/iso/home/standards/iso26000.htm>

6. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas <http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf>
7. OECD Guidelines for Multinational Enterprises <http://www.oecd.org/daf/inv/mne/48004323.Pdf>
8. OHSAS 18001 (replaced by <https://www.iso.org/standard/63787.html>)
9. Rio Declaration, Agenda 21 www.unep.org
10. Social Accountability 8000 www.sa-intl.org/
11. UK Modern Slavery Act http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf
12. UN Global Compact www.unglobalcompact.com
13. UN Guiding Principles on Business and Human Rights https://www.ohchr.org/_layouts/15/WopiFrame.aspx?sourcedoc=/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf&action=default&DefaultItemOpen=1
14. UN National Human Rights Action plans <http://www.ohchr.org/EN/Issues/Business/Pages/NationalActionPlans.aspx>
15. UN Sustainable Development Goals <http://www.un.org/sustainabledevelopment/>
16. United Nations Convention against Corruption <http://www.unodc.org/unodc/en/treaties/CAC/index.html>
17. Voluntary Principles of Business and Human Rights www.voluntaryprinciples.org
18. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas www.oecd.org/corporate/mne/mining.htm
19. Free Prior and Informed Consent – An Indigenous Peoples’ right and a good practice for local communities – FAO www.fao.org/3/a-i6190e.pdf