

DX Supplier Code of Conduct: responsible procurement

DX (Group) plc (**DX**) is a leading independent provider of next day delivery services for mail, parcels and heavier items operating throughout the UK and Ireland. DX offers quality service, high security and an unrivalled range of services, providing proven next day and 2-Man deliveries to business and residential addresses nationwide.

DX is committed to promoting and maintaining high standards of Corporate Social Responsibility in a manner that is consistent with our responsibilities towards our shareholders, employees, customers, suppliers and the communities in which we work. DX requires our suppliers and contractors to adopt a similar responsible approach and to adopt and apply standards that are consistent with this DX Supplier Code of Conduct (the **DX Supplier Code**). All new suppliers and contractors are issued with this DX Supplier Code and are required to acknowledge receipt and adherence.

DX Guiding Principles

DX adopts the following guiding principles in its procurement activities:

1. A safe and pleasant place to work

DX seeks to only use suppliers that act responsibly regarding the welfare of their employees and their families and who provide safe working conditions.

In particular, our suppliers must:

- treat employees with respect and dignity and prevent discrimination;
- ensure employees are engaged under fair terms with reasonable pay and all staff, including agency workers, have a written contract of employment;
- prohibit any type of harassment including physical or verbal abuse, threats and bullying;
- ensure working hours of employees comply with national laws and industry specific regulations;
- ensure no person is employed who is below the minimum legal age for employment;
- ensure no person under 18 years of age is employed for any hazardous work;
- prohibit forced, bonded or compulsory labour so that employees are free to leave their employment after reasonable notice;
- ensure no person has had to pay any direct or indirect fees to obtain work;
- allow all employees freedom to join, or not to join, an employee representative body;
- ensure compliance with national legal and regulatory requirements and applicable policies and procedures on health and safety and the environment;
- ensure health, safety and environmental risks are identified, minimised and managed; and
- identify and implement opportunities for continual improvement in health, safety and environmental performance.
- 2. Environmental sustainability

In our procurement process DX will seek to support companies that adopt an environmentally sustainable approach to their business activities and those of their supply chain including encouraging wherever possible:

- minimising waste and implementation of energy saving solutions;
- re-use and recycling of goods and purchasing products made from recycled or biodegradable materials;
- the elimination of hazardous materials; and
- the utilisation of more environmentally friendly vehicles.



3. Honesty and Integrity

At DX it is our policy to conduct all of our business in an honest and ethical manner. We take a zerotolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. DX expects the highest standards of honesty and integrity from its suppliers.

In particular, we expect our suppliers:

- to ensure that no inducement of any kind is offered to or received from another person employed or otherwise engaged on behalf of DX that is designed to encourage them to behave improperly or which is used to gain a financial, personal or commercial advantage; and
- to ensure that under no circumstances should any employee or person representing that supplier engage in any act of bribery, corruption or money laundering.

In particular, the supplier may not offer services, gifts or benefits to DX representatives in order to influence that person's conduct in representing DX. Reasonable and proportionate entertainment is not prohibited providing that the impartiality of the person giving or receiving the entertainment is not compromised in any way.

Some or all of your employees may be subject to our vetting requirements in which case, failure to ensure compliance with the vetting requirements or to report any relevant conviction in writing to your DX contact immediately is considered a material breach of contract by the supplier and may lead to a termination of the relationship with DX.

4. Compliance with the law

In addition to the requirements outlined above, DX requires all of its suppliers to be familiar with all relevant legal requirements and to comply with all applicable laws. DX expects suppliers to provide appropriate training for its employees and subcontractors to ensure compliance, for example, on areas such as Data Protection, confidentiality and compliance with competition law.

In particular, suppliers should ensure that:

- all personal data is adequately protected and only used for the proper purpose;
- commercially sensitive information is only shared on a "need to know" basis and has appropriate protection put in place;
- pricing and price sensitive information is not shared with competitors;
- confidential information is not shared with third parties in breach of confidence; and
- conflicts of duty are avoided or are fully disclosed to DX in writing as soon as they arise.

Compliance with the DX Supplier Code of Conduct

DX requires all if its suppliers to comply with this Code and reserves the right to check compliance at any time. The supplier is responsible for conveying this Code to its employees and throughout its supply chain.

Any breach of the obligations stipulated in this Code is considered a material breach of contract by the supplier and may lead to a termination of the relationship with DX. However, our preference is to work collaboratively with our suppliers to identity any issues and to ensure that appropriate remediation steps are taken promptly. DX encourages its suppliers to engage with DX at the earliest opportunity if it becomes aware of any difficulty in complying with the DX Guiding Principles. You can raise your concerns with your usual contact at DX or by emailing legalandregulatory@thedx.co.uk.

Continuous Improvement and Review

Our aim is to continually evolve and improve our standards of Corporate Social Responsibility. Accordingly, this Code will be subject to regular review to ensure it keeps pace with our constantly evolving and growing business. We welcome feedback and suggestions; please send your comments to <u>legalandregulatory@thedx.co.uk</u>.