



**REDPATH PARTNERS CODE OF CONDUCT**  
**- RSEC -**

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0	11/05/2015	First Draft
1	21/07/2015	Pre-code version
2	19/04/2023	Modern Slavery Inclusion



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### WHAT IS RSEC?

Redpath and the group of companies that function under the Redpath holdings structure worldwide is committed to high standards of compliance and sustainability.

Redpath has a 'zero tolerance' policy when it comes to unethical business behavior, such as bribery and corruption. We expect all of our suppliers to adhere to similar standards and to conduct their business ethically. As a supplier, you must comply with all applicable laws and regulations, the requirements set out in this Redpath Supplier Code of Conduct, hereinafter RSEC, and your contractual obligations to us.

RSEC defines the main principles underlying your business activities as one of our suppliers.

### SIGNOFF

All Redpath suppliers will be required to adhere through the signature of this document by a valid company representative statement applicable for the next two years to the policies and obligations stated in RSEC for suppliers.

### CONTENT

These are the following:

#### Human rights:

As a supplier to Redpath, you shall

- respect the personal dignity, privacy and rights of each individual;
- refuse to make any person work against his or her will; and
- not tolerate behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.



## REDPATH PARTNERS CODE OF CONDUCT - RSEC

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### **Fair labor conditions and child labor:**

You shall ensure fair labor conditions. In particular, you will

- refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation;
- respect the rights of employees to freely associate and bargain collectively;
- not tolerate or use child labor in any stage of your activities other than in accordance with all applicable laws and regulations;
- not use any forced labor or involuntary prison labor and allow all employees the choice to leave their employment freely upon reasonable notice;
- compensate employees fairly and follow local wage regulations and / or collective agreements, and where these do not exist, compensate employees so at the minimum they can meet their basic needs;
- ensure that working hours, including overtime, do not exceed applicable legal limits, and where such limits do not exist, we recommend that working hours not exceed sixty hours per week including overtime; and
- ensure that employees are allowed at least one uninterrupted day off per week.

### **Health, safety and environmental management:**

For Redpath Safety is “First, Last and Always”, therefore you shall provide a safe and healthy workplace for all of your employees and shall conduct your business in an environmentally sustainable way. In particular, you will:

- formally appoint a competent person to manage health, safety and environmental programs and improvements;
- establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks; and
- ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures.

### **Business ethics:**



## REDPATH PARTNERS CODE OF CONDUCT - RSEC

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You shall conduct your business in an ethical manner. In particular, you will

- refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including Redpath employees), government officials and any other party are in compliance with applicable anti-bribery laws;
- adhere to anti-trust and other competition laws;
- disclose to Redpath information regarding potential conflicts of interest relating to your activities as a Redpath supplier, including disclosure of any financial interest a Redpath employee may hold in your business;
- protect all confidential information provided by Redpath and our respective business partners;
- respect intellectual property of others, including Redpath; and
- adhere to international trade regulations and export control regulations.

### **Secure business:**

You shall conduct your business in a secure manner. In particular, you will

- implement reasonable measures for minimizing exposure of Redpath to security threats such as terrorism, crime, pandemics and natural disasters; and
- when visiting or working at Redpath locations, abide by Redpath's security procedures and report any security concerns to the appropriate Redpath channels.

### **Procurement by supplier:**

You shall procure goods and services in a responsible manner. In particular, you will

- select your own suppliers providing goods or services directly or indirectly to Redpath based on them agreeing to adhere to standards comparable to those set forth in this Redpath RSEC; and
- when working at Redpath offices and factories, only subcontract work with prior consent from Redpath.



## REDPATH PARTNERS CODE OF CONDUCT - RSEC

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### **Modern Slavery:**

Redpath's policies surrounding procurement of goods and services from third parties is subject to the mandates stated on our Modern Slavery statement that is part of this document. By adhering to this document, you are stating that you will accept the principles Redpath adheres to regarding Modern Slavery regulations and efforts. These efforts extend, but are not limited to:

- Adherence to the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights (UNGP); and
- Promote and adhere to an internal Code of Conduct and Ethics; and
- Implement Anti Bribery and Anti-Corruption policies; and
- Implement appropriate anti-money laundering and anti-terrorist financing measures; and
- Respect all applicable environmental regulations as well as all legal and regulatory compliance; and
- Privacy and confidentiality; and
- Fair Labour Practices; and
- Protection of Health and Safety.

We are committed to conducting our affairs to the highest standards of ethics, we believe our partners and suppliers should as well. Our Modern Slavery Statement is reviewed and updated annually.

### **Inspections and corrective actions:**

In order to ensure and demonstrate compliance with the Redpath RSEC, you shall keep record of all relevant documentation, and provide to us supporting documentation upon request.

To verify your compliance, we reserve the right to audit and inspect your operations and facilities, at our own cost and upon reasonable notice, with or without support of a third party. If the results of such an audit or inspection cause us to be of the opinion that you do not comply with this Redpath RSEC, you shall take necessary corrective actions in a timely manner, as directed by us. If you fail to comply with this Redpath RSEC, then we may take action against you, including suspending or terminating your activities as one of our suppliers.



**REDPATH PARTNERS CODE OF  
CONDUCT - RSEC**

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**Access to remedy:**

In the context of our business relationship, if you or your employees believe that the terms of this Redpath RSEC are not adhered to, or that Redpath is not acting in accordance with its own Redpath RSEC, then we encourage you to raise your concerns via the Redpath reporting channels. Please ask the designated Redpath Compliance Officer or visit Redpath web site to learn more about these reporting channels.

**Signoff:**

**On behalf of....., supplier of  
goods and services to Redpath**

**I,.....  
a duly appointed representative of said supplier adhere fully and without  
reservation to the principles stated in this document.**

**I also declare that I am able to provide sufficient proof of representation at request.**

**DATED:**