



Supplier Code of Conduct

January 2025

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Introduction

The Floorbrite Group is committed to upholding ethical business practices, environmental sustainability, health and safety, and full compliance with all applicable UK laws and regulations. This Code outlines the minimum standards we expect all suppliers and subcontractors (“Suppliers”) to meet when working with us.

The Supplier must comply with all applicable UK laws, regulations, and industry standards, as well as the requirements outlined in this Code and any other contractual obligations with the Floorbrite Group. Where contradictions arise between this Code, contractual terms, or applicable laws, the stricter requirement shall apply.

The Supplier must ensure that any sub-suppliers involved in services for the Floorbrite Group comply with this Code or an equivalent Code of Conduct.

The Supplier must communicate these requirements to sub-suppliers and obtain written acknowledgment that they have read and accept the terms of this Code. The Supplier is accountable for ensuring compliance by their sub-suppliers and for addressing any violations.

The Supplier shall implement systems, policies, and procedures to:

- Identify, address, and mitigate risks in areas covered by this Code.
- Document an action plan to ensure compliance with this Code, including any corrective measures.
- Ensure policies and procedures are regularly updated to reflect changes in applicable UK laws.
- Communicate the requirements of this Code to all employees, provide relevant training, and establish a whistleblowing mechanism for reporting violations confidentially.

Standards and Sustainability Principles

1.1 Human Rights

The Supplier must respect and uphold internationally recognised human rights as outlined in the UK's Human Rights Act 1998 and the Modern Slavery Act 2015. The Supplier must avoid contributing to human rights abuses and take active steps to identify and mitigate any risks in their operations and supply chains.

1.2 Labour Standards

The Supplier must adhere to UK labour laws, including the Employment Rights Act 1996, Equality Act 2010, and other relevant legislation. This includes:

Freedom of Association and Collective Bargaining

Workers must have the right to join trade unions and engage in collective bargaining in accordance with UK laws. Where unions are not established, alternative worker representation must be facilitated.

Prohibition of Forced and Child Labour

The Supplier must ensure compliance with the Modern Slavery Act 2015, prohibiting forced labour, human trafficking, and modern slavery in all forms. Employment must be voluntary, and employees must not be required to surrender identity documents or pay recruitment fees.

Child labour is strictly prohibited. The minimum working age must align with the Education and Skills Act 2008 (school-leaving age in the UK), and young workers (16–18) must not perform hazardous tasks.

Fair Labour Conditions

Employees must have written contracts of employment that comply with UK employment law, outlining their duties, hours, and wages.

All wages must meet or exceed the National Minimum Wage or National Living Wage as applicable, and payments must be made regularly and on time.

Working hours must comply with the Working Time Regulations 1998, including limits on maximum weekly hours and entitlements to rest breaks and annual leave.

Non-Discrimination and Equal Opportunity

The Supplier must comply with the Equality Act 2010 by providing equal opportunities and ensuring no discrimination based on characteristics such as age, gender, race, religion, disability, or sexual orientation.

Dignity and Respect

The Supplier must ensure workplaces are free from harassment, bullying, and abuse. Clear grievance procedures must be in place to address such issues promptly.

1.3 Health and Safety

The Supplier must provide a safe and healthy work environment for employees, contractors, and visitors, in line with the Health and Safety at Work Act 1974 and associated regulations. This includes:

- Conducting regular risk assessments and implementing measures to mitigate workplace hazards.
- Providing employees with appropriate training, personal protective equipment (PPE), and clear instructions for safe working practices.
- Maintaining fire safety measures and conducting regular fire drills.
- Ensuring adequate first aid facilities and access to clean drinking water and sanitary facilities.
- Reporting and investigating workplace accidents and near-misses, with measures to prevent recurrence

To support our aim to drive safety performance toward a level of "Zero Incidents" and protect the health and safety of all employees, visitors, contractors, and others visiting client premises, we expect a strong commitment to safety from our subcontractors. The following points cover our minimum expectations which must be always adhered to and will be assessed at review meetings:

- All required insurances are in place and up to date and copies sent to Floorbrite and held on-site.
- Public Liability Insurance of a minimum of £5,000,000 Public Liability cover for all contracts is required. However, in exceptional circumstances, consideration will be given for low-risk sub-contractor activities to have lower public liability cover.

- Appropriate Risk Assessments and Method Statements (RAMS), specific to the work to be completed, are prepared, and held on-site. Where required, RAMS should be submitted for approval to Floorbrite in advance of proposed works and copies should be held on site.
- Staff are suitably trained and competent to carry out their work activities with records maintained.
- All chemicals used by the Subcontractor should have suitable COSHH documentation in place and held on-site.
- All portable electrical items should be subject to a minimum of annual PAT testing.
- All accidents, no matter how small; are to be advised to Floorbrite and a formal investigation carried out with any required actions completed.

In addition, each sub-contractor will be expected to complete a Sub-Contractor H&S appraisal form prior to appointment, and this is to be reviewed annually for any changes.

Audit and Review

As part of our commitment to our clients and in striving to achieve the highest of standards throughout the business, sub-contracted sites; in addition to Floorbrite sites, may be subjected to a random site inspection and audit, at least annually. As part of these audits and inspections, the following key areas will be addressed:

- Policy statements and insurances available on site.
- RAMS and COSHH information
- General site Health & Safety standards
- General employee Health & Safety awareness
- Site File information
- Any other observations

Sub-Contracting Work

In order to ensure any work undertaken on behalf of Floorbrite, with a requirement for additional sub-contractors on your behalf, we will require the following key areas are instigated.

- Details of the work undertaken by your sub-contractors and your arrangements for assessing the competence of sub-contractors used and for monitoring their ongoing health and safety performance.
- Details of the work undertaken by these staff, your arrangements for ensuring their competence and for monitoring their ongoing health and safety performance.
- You confirm that you do not permit your sub-contractors to appoint their own sub-contractors.

1.4 Environmental Standards

The Supplier must comply with all UK environmental laws and regulations, including the Environmental Protection Act 1990 and the UK's commitment to net zero emissions by 2050. Suppliers are expected to:

- Use natural resources responsibly and minimise waste and emissions.
- Implement measures to reduce energy consumption and increase the use of renewable energy.
- Prevent pollution and ensure safe management of chemicals, waste, and hazardous materials.
- Continuously assess and improve environmental performance, ideally through an Environmental Management System (e.g., ISO 14001 certification).

1.5 Ethical Business Practices

The Supplier must adhere to the highest standards of integrity, transparency, and accountability in all business dealings. This includes:

Conflict of Interest:

- Suppliers must disclose any potential conflicts of interest involving their relationship with the Floorbrite Group.

Anti-Corruption:

- Suppliers must comply with the Bribery Act 2010 and ensure no bribes, facilitation payments, or other improper benefits are offered or accepted.

Fair Competition:

- Suppliers must not engage in anti-competitive practices, including price-fixing or market-sharing agreements.

1.6 Data Protection

The Supplier must comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 when handling personal data. Suppliers must:

- Ensure personal data is processed lawfully, fairly, and transparently, and only for the purposes it was collected.
- Implement robust data security measures to prevent unauthorised access, loss, or misuse of data.
- Limit access to personal data to authorised personnel only and ensure it is stored securely.
- Notify the Floorbrite Group promptly in the event of a data breach or security incident involving data processed on behalf of the Floorbrite Group.

Monitoring, Compliance and Reporting

The Floorbrite Group's relationship with its Suppliers is built on trust, honesty, and cooperation. To ensure compliance with this Code, the Floorbrite Group or an appointed third party reserves the right to audit Suppliers at any time, with prior notice. These audits may include access to relevant documentation, facilities, and discussions with personnel.

If a violation of this Code, or any applicable laws, is identified—whether through audits, external reports, or self-reporting—the Floorbrite Group will provide guidance on the conditions that need to be amended or improved. Suppliers are required to take immediate corrective action in accordance with the Floorbrite Group's instructions. Failure to address such issues adequately may lead to further action, including the cancellation of outstanding and future orders or termination of the agreement in cases of significant or repeated breaches.

Suppliers must also monitor their own subcontractors and sub-suppliers for compliance. If a Supplier becomes aware of violations or misconduct by its subcontractors or sub-suppliers, they must immediately inform the Floorbrite Group.

The Supplier should guide the sub-supplier on corrective actions, and if the sub-supplier fails to take these measures, the Supplier must terminate the relationship with the sub-supplier to maintain compliance with this Code.

The Floorbrite Group takes all reports of violations seriously and encourages active communication with Suppliers to address any questions or concerns related to this Code. Reports of suspected violations or unethical practices can be made directly to the Health, Safety & Compliance team:

Email: Safety@Floorbrite.co.uk
Tel: 0161 972 3000

All reports will be treated confidentially and thoroughly investigated. The Floorbrite Group guarantees there will be no retaliation for reporting in good faith.

Nik Wyers
Managing Director



Sign Off and Acknowledgement

By signing below, the Supplier acknowledges that they have read, understood, and agree to comply with the Floorbrite Group Supplier Code of Conduct.

Supplier Name:

Authorised Representative Name:

Position:

Signature:

Date: