



M GROUP

M Group Supply Chain Code of Conduct

14/04/2025



Background

M Group delivers essential infrastructure services that communities and industry depend on every day. From water and energy to transport and telecommunications, our work shapes the environment around us and impacts lives across the UK and Ireland. This responsibility extends throughout our supply chain, where the decisions we make today influence the infrastructure and communities of tomorrow.

While our direct operations focus on the UK and Ireland, our supply chain connects us globally. This brings both opportunities and obligations. The materials we source, the services we procure, and the partnerships we build all contribute to our wider impact on society and the environment.

Our supply chain partners play a vital role in delivering these essential services. Together, we navigate complex challenges from climate change to human rights, from resource scarcity to technological transformation. Success requires proactive engagement with these challenges and a commitment to continuous improvement.

We are committed to ensuring that our dealings with our supply chain are fair and ethical. We want to work with a diverse supply chain who meet the required level of performance and quality to help us to deliver our vision and strategy.

This Code of Conduct establishes clear expectations for all organisations in our supply chain. It reflects both current regulatory requirements and emerging best practices in sustainable business operations. We recognise that different organisations start from different places and face varying challenges. This code sets minimum requirements while encouraging suppliers to go further where possible. In addition, all potential members of our supply chain are subject to due diligence to ensure that our requirements are met. We also expect our supply chain to align with our business values.

The standards outlined here help build resilient supply chains, reduce operational risks, and strengthen our collective ability to deliver essential infrastructure services sustainably.

Health, Safety and Wellbeing

The health, safety and wellbeing of our people, clients, supply chain and members of the public is paramount to M Group.

We require that all supply chain partners:

- Meet our health and safety Minimum Standards
- Are committed to creating and maintaining a safe and healthy working environment for all those impacted by the undertaking
- Ensure people have the processes, means and collaborative support to carry out work safely
- Are adequately trained and operate under the direction of suitably qualified supervisors
- Develop, monitor and maintain safe systems of working
- Where undertaking contracted work for M Group, report and investigate all safety incidents through our incident management centre
- Meet all statutory safety requirements

Ethics and Compliance

Strong ethical practices protect both our business and yours. Beyond meeting legal requirements, ethical behaviour builds trust with stakeholders and strengthens business resilience.

We require that all supply chain partners:

- Comply with all applicable laws, regulations, and standards
- Prevent bribery, corruption, and anticompetitive practices and have adequate processes and procedures in place to achieve this
- Ensure that any gifts and hospitality are reasonable and do not influence decision making recognising the best way to avoid this is to avoid offering gifts or hospitality altogether
- Ensure compliance with tax law and have procedures in place to prevent the facilitation of tax evasion and other offences under the Criminal Offences Act 2017
- Adhere to sanctions legislation and international trade controls
- Maintain transparent and accurate business records
- Protect confidential information and intellectual property
- Report ethical concerns promptly
- Cascade these requirements through their own supply chains.

Human Rights and Fair Labour Practices

Respecting human rights and ensuring fair labour practices form the foundation of sustainable business operations. These standards apply throughout the supply chain.

We require that all supply chain partners:

- Prohibit forced labour, child labour, and human trafficking
- Ensure fair wages and working hours

- Protect freedom of association and collective bargaining rights
- Prevent discrimination and harassment
- Respect workers' rights throughout operations

Environmental Protection

Environmental stewardship affects business resilience and stakeholder trust. Managing environmental impacts helps secure our shared future while creating business opportunities.

We require that all supply chain partners:

- Comply with environmental regulations and standards
- Work to measure and reduce environmental impacts
- Manage waste responsibly
- Protect biodiversity
- Use resources efficiently
- Report environmental performance annually

Carbon and Climate Impact

Understanding our supply chain's carbon footprint enables effective climate action and helps meet regulatory requirements. This data supports both our businesses in transitioning to a low carbon economy.

Supply chain partners commit to minimising Green House Gas (GHG) emissions through the deployment of energy and fuel saving measures.

For the supply chain categories that represent a high indirect GHG impact within our science-based target, we require you to:

- Report quantities of materials supplied to M Group companies and their associated GHG emissions or provide relevant EPDs or LCAs environmental product declaration or lifecycle analysis
- Set a science-based GHG reduction target through science-based target initiatives
- Report annually to us on actions taken to reduce GHGs and the associated GHG reductions

Supply Chain Responsibility

Supply chain transparency reduces risks and improves performance. Understanding our extended supply chain helps identify and address potential issues before they affect operations.

We require that all supply chain partners:

- Conduct due diligence on their own supply chain
- Monitor supply chain compliance
- Address non-compliance promptly
- Maintain transparency in sourcing
- Support responsible procurement practices
- Report significant supply chain risks

Data Protection and Security

Data protection and privacy laws require us to protect the collection, storage, use, disclosure, retention and disposal of personal information that can identify a living person.

Protecting information and systems safeguards both our organisations. Strong security practices prevent disruption and maintain stakeholder confidence.

We require that all supply chain partners:

- Ensure full compliance with all relevant data protection law
- Process any data shared by M Group lawfully and in accordance with your contractual obligations
- Only collect personal data required to fulfil the service you are providing
- Train staff in data protection requirements
- Protect sensitive information through appropriate controls
- Maintain robust cybersecurity measures
- Report security incidents within agreed timeframes
- Review security measures regularly

Risk Management

Effective risk management protects business continuity. Understanding and addressing risks proactively prevents disruption to our shared operations.

We require that all supply chain partners:

- Identify and manage business risks systematically
- Maintain business continuity plans
- Monitor compliance with all requirements
- Address issues before they affect operations
- Report significant risks to M Group promptly
- Review risk assessments regularly

Verification and Compliance to this code of conduct

M Group supports suppliers in meeting these requirements while maintaining the right to verify compliance to this code.

M Group reserves the right to:

- Verify compliance through audits and assessments
- Request documentation of compliance
- Require corrective actions where needed
- Terminate relationships for serious breaches
- Review compliance periodically
- Share compliance data with stakeholders as required

Reporting Concerns

Supply chain partners are encouraged to report any suspicions of concerns regarding misconduct or unethical behaviour. Open communication helps address issues early. Multiple reporting channels are available to ensure concerns receive appropriate attention. Reports will be treated confidentially and investigated thoroughly. M Group prohibits recrimination or retaliation against anyone reporting concerns in good faith.

Supply chain partners must report any concerns through any of the following:

- Their M Group contact
- M Group's independent compliance hotline provided by Navex: 0800 890 011
- Online portal: <https://mgroupservices.ethicspoint.com>