

An aerial photograph of a winding dirt road through a dense forest. The sun is setting in the upper left, casting a golden glow over the scene. The trees show a mix of green and autumnal colors like yellow and orange. The text 'Supplier Code of Conduct' is written in large, white, sans-serif font across the middle of the image.

# Supplier Code of Conduct

drax





## Message from our Chief Executive, Will Gardiner

Drax Group (“**Drax**”) is committed to conducting business in accordance with all applicable laws, rules and regulations and in line with the Drax Code of Conduct, which can be found at [www.drax.com](http://www.drax.com). We are dedicated to doing the right thing and seek only to work with suppliers whose standards are consistent with our own.

## Commitment to this Code


On this basis, our suppliers are required to carry out their business in accordance with all applicable laws, rules and regulations and to comply with this Supplier Code of Conduct (“**Code**”) when working for Drax. The Code reflects the principles and behaviours contained within the Drax Code of Conduct.

Our suppliers are also expected to ensure that their own suppliers operate in line with the standards within this Code, where involved in activities on behalf of Drax.




## Speaking Up Reporting Concerns

We take non-compliance with this Code seriously. If a supplier or any third party has a concern that this Code has not been complied with, they are encouraged to raise this with Drax directly by emailing:

**1**  **Business Ethics Team**  
Email: [speak.up@drax.com](mailto:speak.up@drax.com)

Or, you can contact us through our independently operated **Speak Up service** (anonymously if preferred):

**2**  Telephone numbers: [www.safecall.co.uk/freephone](http://www.safecall.co.uk/freephone)  
Web portal link: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

Suppliers are encouraged to provide a similar anonymous service for their supply chain to raise such concerns.

# Supplier Code of Conduct Standards

## The Law

Suppliers are required to comply with all applicable laws, rules and regulations in the countries in which they operate. Where appropriate, suppliers must also comply with all relevant maritime laws, regulations, permits and international maritime standards. Suppliers must avoid any actions that could lead Drax to breach or be subject to penalties under applicable law.

## Health and Safety

Suppliers must, in compliance with all applicable laws and regulations, provide a safe and healthy working environment for their employees, and provide their employees with appropriate training and sufficient personal protective equipment, taking into account the inherent risks in the sector. Adequate health and safety management and controls must be implemented.

## Environment

Suppliers must comply with all applicable environmental laws, regulations and permits in the countries in which they operate and reduce the impacts of their operations on the local environment and community.

Suppliers should support a precautionary approach to environmental challenges and initiatives to promote greater environmental responsibility.

## Positive Social Impact

Suppliers are expected to respect the rights, interests and development aspirations of the communities in which they operate, particularly during significant changes to the supplier's normal operations.



## Privacy, Protection and Confidentiality

Suppliers must obtain, save, process, hold, disclose and transfer personal information in line with all applicable laws and regulations and must safeguard Drax's confidential information.

## Human Rights

Suppliers must not breach any internationally proclaimed human rights in the countries in which they operate or be complicit in the breach of such rights by third parties, including their governments.





## Labour

Suppliers must not engage underage workers (as defined by applicable local laws) or any workers subject to human trafficking, or use any form of slavery, forced or compulsory labour (which consists of any work or service not voluntarily performed that is exacted from the individual under threat of force or penalty). Suppliers must not engage in any activity, practice or conduct that does, or would – if such activity, practice or conduct were carried out in the UK – constitute an offence under the Modern Slavery Act 2015.

Suppliers must not discriminate in respect of employment and occupation and must treat their workers with dignity and respect.

Suppliers must comply with all applicable laws in relation to working hours and remuneration and must respect the rights of their employees to freely associate and bargain collectively.

Suppliers should promote diversity and inclusion within their workforce.

## Bribery, Corruption and Financial Crime

Suppliers must uphold high standards of business ethics and not engage in illegal activities such as corruption, bribery, fraud, extortion, money laundering or tax evasion, or conduct their dealings in ways that are unethical or contrary to professional practice. Suppliers are expected to have adequate procedures in place to counter such issues.

Suppliers must avoid conflicts of interest that may compromise their credibility with Drax or the confidence of others in Drax. If such conflicts arise or appear to arise, suppliers must mitigate them and promptly report them to Drax.

## Economic and Trade Sanctions

Suppliers must refrain from taking any action that would result in a violation of economic or trade sanctions.

## Fair Competition

Suppliers must respect and comply with all applicable competition laws and regulations, including not entering into discussions or agreements with competitors concerning pricing, market sharing or similar activities.

## Due Diligence

Suppliers are expected to conduct appropriate and proportionate due diligence on parties in their own supply chain, particularly when sourcing from high-risk areas.

# Continuous Improvement

Drax seeks to work in partnership with others to strengthen our approach to ethical business conduct.

## UN Global Compact (UNGC)

Drax is a participant of the UNGC, which is a voluntary corporate sustainability initiative that encourages businesses worldwide to adopt sustainable and socially responsible practices. Drax encourages its suppliers to align their practices with the UNGC's ten principles, which include areas such as human rights and labour standards. Further information on the UNGC can be found on its website: [www.unglobalcompact.org](http://www.unglobalcompact.org).

## UK Real Living Wage (RLW)

Drax pays all UK colleagues the equivalent of the RLW (as a minimum) and requires its suppliers operating in the UK whose contracted staff work for or on behalf of Drax for 2 or more hours a week, for 8 or more consecutive weeks a year, to do the same. For suppliers who do not meet this threshold, we still encourage payment of the RLW to their staff in the UK. Further information on the RLW can be found at: [www.livingwage.org.uk](http://www.livingwage.org.uk).

