

CAIRN

Supplier Code of Conduct

June 2024

Built For Good

Cairn Supplier Code of Conduct

1. At Cairn Homes plc (“Cairn”), we are committed to building sustainable communities where people can thrive. This includes conducting our business in a sustainable, responsible, and ethical manner, and we expect our Suppliers, Subcontractors and Service Providers (“Supply Chain Partners”) to conduct their business in the same way.
2. This Supplier Code of Conduct sets out the minimum standards that our Supply Chain Partners are required to meet. These minimum standards are as follows:
 - 2.1. **Contractual and Legislative:** We require our Supply Chain Partners to ensure their operations comply with all applicable laws and adhere to the terms and conditions within our contracts as well as our Supplier Code of Conduct.
 - 2.2. **Health & Safety:** We require our Supply Chain Partners to provide a healthy and safe working environment for their workers, in accordance with applicable standards and laws, as well as the standards set by Cairn.
 - 2.3. **Human Rights & Labour Practices:** We require our Supply Chain Partners to uphold human rights and fair labour practices within all business activities and condemn all forms of exploitation. This includes but is not limited to the following:
 - Comply with all applicable labour and human rights laws, including the Sectoral Employment Order (Construction) and laws regarding legal working age;
 - Prohibition of modern slavery, including: Child labour, forced and compulsory labour, servitude, slavery, and trafficking; and,
 - Respecting Freedom of Association, Diversity, and Inclusion: Respect freedom of association and provide an inclusive working environment which respects diversity of characteristics including but not limited to sexual orientation, age, gender, race, ethnicity, disability, civil status, personality, thinking style and religious beliefs.
 - 2.4. **Environment & Climate Change Requirements:** Cairn’s Supply Chain Partners are expected to actively manage the environmental impact of its activities through their core environmental practices and ensure sufficient resources are provided to support them. Furthermore, Supply Chain Partners are expected to comply with the spirit, as well as the letter, of all applicable environmental laws.
 - 2.5. **Ethical Business Practices:** The highest ethical standards must be upheld by Supply Chain Partners. These include but are not limited to the following areas:
 - *Anti-corruption & Bribery:* Bribery, corruption, and unethical business practices are prohibited.
 - *Intellectual Property:* Intellectual property rights are respected, and others’ intellectual property is used only with permission.
 - *Responsible Sourcing:* Responsible sourcing policies and procedures are adopted. Products, materials, and services should be sourced in a way that supports environmental stewardship and respects human rights and social responsibility.

- *Conflict of Interest*: Potential and actual conflicts of interest that could interfere with the fair execution of duties are disclosed in a timely manner to Cairn.
 - *Data & Privacy*: Rigorous protection of the confidentiality and privacy of all data is expected for the duration of a contract with Cairn.
 - *Business Integrity*: The principles of fair competition and transparency will be upheld in all interactions between Supply Chain Partners and Cairn, with the highest standards of integrity, honesty, and ethical behaviour.
3. **Continuous Improvement**: Cairn is dedicated to encouraging best practices in responsible sourcing. We will collaborate with Supply Chain Partners to ensure sustainability and responsibility are at the forefront of our operations. We will regularly review this Code of Conduct and implement any improvements we believe support best practices.
 4. **Supply Chain Sustainability School of Ireland**: Cairn are proud to be founding partners of The Supply Chain Sustainability School Ireland. We request that all Supply Chain Partners become members of the school and encourage them to utilise this free resource to further their own understanding of sustainability best practice and how we collectively achieve a more sustainable future. See <https://www.supplychainschool.ie/>
 5. **Compliance & Enforcement**: Cairn may take corrective actions with any Supply Chain Partner that is not compliant with this Code, including contract termination.
 6. **Communication**: We will communicate this Supplier Code of Conduct to our Supply Chain Partners and stakeholders on a regular basis. Feedback and suggestions for improvement are welcomed.
 7. **Reporting Concerns**: Our Supply Chain Partners are required to report any concerns regarding potential breaches of this Code or the law. These or any other related concerns can be reported to procurement@cairnhomes.com or confidentially via our online confidential reporting tool, *Integrity Line* at the following link <https://cairn.integrityline.com/>. This confidential tool ensures anonymity (if you select that option) and is monitored by the Company Secretary. Please also see our Grievance Policy, available on our website, for further guidance.