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# RAILPEN SUPPLIER CODE OF CONDUCT

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As a valued supplier, your partnership is vital to Railpen's success and our commitment to our members. We are committed to ethical, responsible business and expect our suppliers to uphold these standards.

This Supplier Code of Conduct sets out the minimum expectations for all suppliers, contractors, consultants, and third parties who provide goods or services to Railpen. It covers human rights, labour, environment, anti-corruption, and data protection, and applies alongside all relevant UK and international laws.

We ask our suppliers to adopt this Code and encourage you to promote these principles throughout your own supply chain. Thank you for supporting Railpen's values and community.

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## OUR PURPOSE AND VALUES

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Railpen's purpose is to secure our members future. To help us to achieve our purpose, we have a set of values that guide our decisions, behaviours, and culture. We expect all our suppliers to adopt and live these values.

Our values are not just words. They are a framework of shared principles and behaviours to guide us in delivering our purpose. Our values are here to help guide us in 'how' we do things at Railpen. These are our values, chosen by us to represent who we are as a collective, and what we believe is important.

### **ALIGNMENT** - *Challenge the thinking, support the decision*

Our passion for our core purpose gives us the permission to speak up to achieve the best outcomes for members. Our decisions align to our purpose; our behaviours align to our collective decisions. Feedback is a gift that takes bravery in giving and courage in receiving. From the foundation of a safe environment, challenge comes without judgement or personal criticism.

### **COMMUNITY** - *Community first, ego last*

We recognise the strength in moving as a collective. We therefore operate on a basis of 'One Railpen', succeeding and learning as a team. We expect our people to be active creators of a positive and inclusive culture by understanding and embracing each other's differences. We invest in each other, collaborating with humility and kindness. When our values are lived, our teammates feel they belong to a community.

### **INTEGRITY** - *Integrity leads to safety*

Perform with integrity at all times. Doing so creates a safe environment where people are honest, transparent and committed to doing what is best for our members and Railpen. We expect teammates to be accountable and to honour our obligations to regulatory conduct and governance frameworks. Integrity creates psychological safety and nurtures a culture of fair challenge.

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## HUMAN RIGHTS AND LABOUR STANDARDS

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We expect our suppliers to respect and uphold human rights, ensuring their operations are free from forced labour, slavery, human trafficking, child labour, and exploitation. Employees and workers must be employed voluntarily, with proper age verification and adherence to all working hours laws.

Suppliers should provide equal opportunities, fair treatment, and prevent discrimination, harassment, or victimisation of any kind. We value diversity, equity and inclusion across all protected characteristics.

Suppliers must respect workers' rights to freedom of association and collective bargaining, following UK law and ILO conventions, and engage openly with employees and their representatives.

A safe and healthy workplace is essential. Suppliers should comply with all health and safety regulations, provide appropriate training, equipment, and protective gear, and ensure access to clean water, sanitation, and medical care.

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## ENVIRONMENTAL PROTECTION

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We are committed to environmental sustainability and require our suppliers to follow all relevant laws and best practices to minimise their environmental impact.

Suppliers must monitor and improve emissions, energy and water use, and waste management, set improvement targets, and report incidents. Efficient resource use, safe disposal of hazardous materials, and effective waste reduction and recycling are expected.

Professional services providers must uphold these standards, demonstrating ethical behaviour, compliance, and respect for confidentiality. Their actions and recommendations should align with our values and the principles in this Code.

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## ANTI-CORRUPTION

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We expect our suppliers to uphold integrity and comply with all relevant anti-corruption laws and regulations. Any form of bribery, corruption, fraud, or unethical behaviour is strictly prohibited. Suppliers must not offer or accept improper payments, gifts, or benefits to influence decisions or gain business advantage, and should avoid conflicts of interest.

Suppliers are responsible for protecting intellectual property, confidential information, and personal data, using them only as authorised, and reporting any breaches. They should cooperate fully with audits or investigations related to this Code, provide accurate information, and promptly report any suspected violations or conflicting requests.

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## DATA PROTECTION

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Suppliers are required to protect personal data in line with all relevant UK and international laws. Data must be collected and processed fairly, only when necessary, and securely stored with appropriate safeguards against unauthorised access or breaches. Suppliers must respect individuals' rights regarding their data and promptly report any data breaches or incidents. Data sharing with third parties or cross-border transfers requires our approval and compliance with legal standards.

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## ONGOING SUPPLIER OVERSIGHT AND ENFORCEMENT

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Railpen's Supplier Oversight Policy sets minimum standards for suppliers, including regular reviews based on categorisation. Each supplier has a designated Relationship Owner at Railpen for operational needs and as an escalation point. We also conduct ongoing due diligence, including confirmation of insurances, accreditations, modern slavery, financial crime and other supplier-specific requirements.

This Code is integral to our supplier engagements and contracts. If standards are unmet and unresolved through reviews or escalation, we will implement formal Supplier Improvement Plans. Persistent issues or significant risks may lead to termination of the relationship.

Suppliers are valued partners, and we welcome feedback to improve our Code and collaboration. For questions or concerns, please contact:

Email: [procurement@railpen.com](mailto:procurement@railpen.com)

Address: FAO Procurement and Supplier Oversight Department Stooperdale Offices, Brinkburn Road, High Coniscliffe, DL3 6EH