

## 1. Introduction

At HSP Valves, we pride ourselves on operating with integrity, fairness, and professionalism always. We are a global organisation serving the energy sector with high-quality valve and automation solutions. Our success relies not only on technical excellence and innovation, but also on the strength and values of the people and organisations with whom we collaborate.

As such, we expect all our suppliers, contractors, consultants, agents, and third-party partners ("Suppliers") to adhere to this Supplier Code of Conduct (hereafter "the Code"), which outlines the principles and standards that underpin responsible, ethical, and lawful business practices.

The Code reflects HSP's values of Safety, Integrity, Responsiveness, Attention to Detail, Leadership, Teamwork, Flexibility, and Ownership, and must be upheld throughout all levels of your business and supply chain. These values are not optional ideals – they are fundamental expectations that form the foundation of our relationships.

This Code forms a key part of HSP's commitment to Corporate Social Responsibility (CSR). We believe that our success must be grounded in practices that respect human rights, uphold environmental stewardship, promote fairness, and contribute positively to the communities in which we operate. We expect our suppliers to embrace these same principles, aligning with our goal of creating a responsible, transparent, and sustainable global supply chain.

## 2. Legal & Regulatory Compliance

Suppliers must, at a minimum, comply with all applicable local, national, and international laws, regulations, directives, and standards wherever they operate or supply goods and services. This includes, but is not limited to, laws relating to:

- Employment and labour rights
- Health and safety
- Data protection and privacy
- Anti-bribery and anti-corruption
- Environmental protection
- Export controls, trade sanctions, and customs compliance
- Equality, diversity, and non-discrimination
- Bullying and Harassment

Where this Code imposes higher standards than applicable laws, suppliers are expected to meet the more stringent requirements.

### **3. Respect for Human Rights & Labour Standards**

HSP is committed to respecting human rights, and we expect our suppliers to share this commitment throughout their operations and supply chains.

#### **3.1 Modern Slavery & Human Trafficking**

All forms of modern slavery are strictly prohibited. This includes slavery, servitude, bonded or forced labour, human trafficking, and other forms of exploitation. Suppliers must maintain effective due diligence procedures to assess, identify, and mitigate modern slavery risks, in accordance with the UK Modern Slavery Act 2015 and equivalent legislation worldwide.

#### **3.2 Child Labour**

Suppliers must not employ workers below the legal minimum working age in their country of operation, or under the age of 15, whichever is greater. Children must not be exposed to hazardous work or work that interferes with their education or development.

#### **3.3 Fair & Lawful Employment**

Workers must be employed voluntarily and have the freedom to terminate their employment. Suppliers shall provide clear written terms of employment and ensure workers are paid fairly, lawfully, and on time, with proper compensation for overtime where applicable. Working hours must not exceed legal limits.

#### **3.4 Freedom of Association**

Suppliers must recognise and respect the rights of workers to join or not join trade unions or other lawful organisations of their choice, to collectively bargain, and to freely express grievances without fear of retaliation or intimidation.

### **4. Health, Safety & Wellbeing**

HSP considers the protection of human health and life to be of paramount importance. Suppliers must:

- Provide a safe and healthy working environment, including measures to prevent injury, illness, and occupational hazards.
- Ensure compliance with all applicable health and safety laws and regulations.
- Implement robust health and safety management systems, including risk assessments, training, and incident reporting protocols.
- Promote mental health awareness and create supportive workplaces that proactively manage fatigue, stress, and wellbeing.

When working on HSP sites or premises, suppliers must adhere fully to our Health & Safety Policy and cooperate with our internal procedures.

## **5. Anti-Harassment, Anti-Bullying & the Worker Protection Act**

HSP maintains a zero-tolerance approach to all forms of harassment, bullying, and victimisation in the workplace. Suppliers must take all necessary steps to prevent, address, and eliminate such behaviours.

This includes:

- Verbal, physical or psychological harassment.
- Sexual harassment, including unwanted physical contact, sexually explicit comments, gestures or conduct.
- Bullying, intimidation or behaviour that undermines dignity at work.

Suppliers must ensure they are compliant with the Worker Protection (Amendment of Equality Act 2010) Act 2023 (or local equivalent), which places a proactive legal duty on employers to prevent sexual harassment in the workplace.

Suppliers must implement adequate policies, training, reporting mechanisms, and disciplinary processes to ensure a culture of respect, safety, and inclusivity. Any incidents or risks of workplace harassment, particularly those involving personnel deployed on HSP contracts, must be reported promptly and addressed appropriately.

## **6. Equality, Diversity & Inclusion (EDI)**

Suppliers must embrace and actively support principles of equality, diversity, and inclusion. Discrimination on any ground – including age, disability, gender, race, religion, sexual orientation, or marital status – is strictly prohibited.

HSP expects suppliers to provide equal opportunities in recruitment, promotion, and professional development, and to foster inclusive workplaces where individuals are treated with respect and dignity.

## **7. Environmental Responsibility**

Environmental sustainability is central to HSP's operations. Suppliers must:

- Comply with all applicable environmental laws, regulations, and standards.
- Monitor and reduce emissions, pollution, and waste, prioritising prevention over remediation.
- Conserve energy, water, and natural resources, and support circular economic principles.
- Encourage environmental awareness among workers and in the supply chain.

Suppliers are expected to support HSP's broader climate and sustainability objectives and demonstrate a clear commitment to responsible environmental stewardship.

## **8. Ethical Conduct & Business Integrity**

Suppliers must conduct all business in an honest, transparent, and ethical manner.

### **8.1 Bribery, Corruption & Fraud**

Suppliers must comply with the UK Bribery Act 2010, and all applicable anti-corruption laws. Bribes, facilitation payments, improper gifts, and kickbacks are prohibited. Any suspected corruption, fraud, or financial misconduct must be reported immediately.

### **8.2 Gifts & Hospitality**

Gifts, meals or entertainment must never be offered to influence an HSP employee's decision-making. Any such gestures must be modest, infrequent, lawful, and disclosed where appropriate. Cash or equivalent gifts are never acceptable.

### **8.3 Conflict of Interest**

Suppliers must disclose any actual or potential conflict of interest that could affect impartiality, fairness, or objectivity in their dealings with HSP.

## **9. Data Protection, Privacy & Confidentiality**

Suppliers must uphold the highest standards in data protection, cybersecurity, and confidentiality. This includes, but is not limited to:

- Full compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and any other relevant privacy and cybersecurity laws.
- Implementation of effective technical and organisational measures to ensure the security, confidentiality, and lawful processing of personal and commercially sensitive data.
- Establishing access controls and secure systems to protect against unauthorised access, data loss, corruption, or misuse, including measures that ensure data is only accessed by authorised personnel.
- Strict controls over any onward sharing, subcontracting, or cross-border transfer of data, ensuring adequate legal safeguards are always in place.
- Mandatory and immediate notification to HSP in the event of a suspected or actual data breach that could affect HSP data, personnel, or systems.

If any supplier requires clarification regarding their data protection responsibilities, or in the event of a breach or suspected incident, they must contact the HSP Valves Data Protection Team without delay.

**Contact: [dataprotection@hsp-valves.com](mailto:dataprotection@hsp-valves.com)**

Suppliers must also cooperate fully with HSP's data protection due diligence activities and audits, and support any investigations, remediation, or regulatory disclosures that may be required because of an incident or compliance review.

Suppliers must uphold the highest standards in data protection and confidentiality, including:

- Compliance with data protection legislation (e.g. UK GDPR, Data Protection Act 2018).

- Implementing technical and organisational safeguards to protect personal and confidential information.
- Immediate notification to HSP in the event of a suspected data breach.
- Avoiding misuse or unauthorised disclosure of HSP's proprietary or commercially sensitive data.

#### **10. Counterfeit, Fraudulent & Suspect Items (CFSI)**

Suppliers must have documented procedures to prevent the procurement, delivery, or use of counterfeit or fraudulent goods. Only genuine, conforming items with the correct certification may be supplied. Suppliers must report any suspected CFSI to HSP immediately and take remedial action as directed.

#### **11. Subcontracting & Supply Chain Responsibilities**

Suppliers are responsible for ensuring that any subcontractors or third parties involved in the delivery of goods or services to HSP also comply with the standards set out in this Code. This includes cascading the Code to relevant third parties, conducting appropriate due diligence, and maintaining oversight of subcontracted activities.

#### **12. Monitoring, Reporting & Whistleblowing**

HSP reserves the right to audit or assess suppliers' adherence to this Code. Audits may include review of documentation, interviews with workers, and on-site inspections.

Where issues are identified, HSP will expect corrective actions to be implemented within agreed timeframes.

Suppliers must have appropriate internal mechanisms to enable the confidential reporting of concerns related to unethical, illegal, or dangerous practices, without fear of retaliation. Suppliers and their workers may also report concerns directly to HSP through our confidential whistleblowing process. Reports can be made anonymously and will be handled with sensitivity.

#### **13. Beaching this Policy**

Failure to comply with this Code may result in:

- Suspension or termination of contract(s)
- Removal from HSP's approved supplier list
- Notification to relevant authorities or regulators
- Legal or commercial consequences as appropriate

HSP reserves the right to take proportionate action based on the severity of the breach.

#### **14. Supplier Acknowledgement & Declaration**

All suppliers are required to acknowledge their understanding of this Code and confirm their commitment to upholding the principles it contains.



Derrick Mackenzie  
Managing Director HSP Valves

REVISION HISTORY				
Rev.	Effective Date	Description	Code	Owner
00	11/02/2026	New	PUR0200-3	Derrick Mackenzie - Managing Director

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