Edwin

# Supplier Code of Conduct

Version 7 | Updated May 2026

## Purpose and scope

This Supplier Code of Conduct (the "Code") sets out the minimum standards that Edwin expects from its suppliers. We encourage all suppliers to go beyond these requirements. The term 'supplier' as used in this code refers to suppliers, vendors, contractors, consultants, trainers, teachers, agents and other providers of goods and services who do or seek to do business with Edwin.

Edwin will only work with reputable suppliers who are committed to working towards compliance with the standards of this Code of Conduct.

Supply chain transparency is required to confirm compliance to this code of conduct. To monitor this, The Edwin may request documentation, conduct onsite audits, review and approve corrective action plans, and verify implementation of corrective action.

We require our suppliers to abide by all applicable national and local laws/regulations in the markets where they operate; however, where local laws or standards differ from this Supplier Code, we expect our suppliers to comply with the more stringent standards and principles. An effective management system should be evident to ensure compliance and identify and reduce operational risks related to this code.

We expect our suppliers and business partners to communicate these expectations throughout their supply chain by adopting efficient management systems, policies, procedures, and training to uphold the standards and expectations set forth in this Supplier Code within their own business operations. Suppliers may be asked to provide a written attestation agreeing that they have read, understand, and will abide by the terms of this Code.

By its acceptance of any purchase order from Edwin, the supplier acknowledges its acceptance of the Supplier Code and intention to comply with its requirements. Where there is a pre-existing relationship with a supplier the requirements of this Code are in addition, and not in lieu of, any legal or contractual agreement between that supplier and Edwin.

## Our Organisation

We are Edwin – a growing collective of like-minded education professionals, working together to positively impact the lives of young people. We are a UK based company that places education and the lives of young people at the forefront of our business. We deliver this service to schools by providing specialist staff, teachers and training. We are made up of nine complementary companies:

- Vision for Education and Axcis Education: Two well- established, market-leading education recruitment agencies with industry experience and expertise. Recruiting and supplying great teachers, support and leadership staff for temporary and permanent positions in schools, colleges and other alternative provisions across the UK.
- Commando Joe's: Offering inclusive school-led programmes to help children and young people develop life skills and resilience. Supporting young people to be physically active through outdoor education programmes for schools, including orienteering and Quidditch
- Staff Well Being Ltd trading as Still Human: Delivering workshops and courses to staff in education on a range of health and wellbeing topics including stress management, rest, menopause and mindfulness
- Seekerstream Ltd trading as Llama ID: A safer recruitment platform providing an all in one solution to complete vetting checks and collect data to support the entire recruitment process
- Edwin People: Providing people-led, tech-enabled strategic leadership and HR services for Education

We also partner with specialist knowledge providers and training partners who help us to upskill our people, keeping us at the forefront of professionalism and advances in the education sector.

## What we expect of you

As a supplier to Edwin, we expect you to conduct business in a fair lawful and honest manner with all your stakeholders, employees, subcontractors and any other third parties, particularly in relation to the following areas:

- Human rights and labour
- Health, safety and welfare
- Supply chain
- Ethical business practice
    - Anti-bribery and Corruption
    - Gifts, Hospitality and Invitations
    - Fair Competition
    - Conflict of Interest
    - Confidentiality and Provision of Information
- Environmental management

## Human rights and labour

Edwin believes in the worth and dignity of each individual. In alignment with the UN's Guiding Principles on Business and Human Rights, and the ILO International labour standards, the Group pledges to uphold the basic freedoms of all individuals; and opposes discrimination of any kind on the basis of race, creed, colour, sex, age, or national origin.

Edwin fully supports legislative efforts to protect human rights and enforce ethical labour practices. We are committed to maintaining an ethical and transparent supply chain free of all types of modern slavery and human trafficking. We do not tolerate corruption, discrimination, harassment, child labour, forced labour, or slavery in any form. Edwin operates a zero-tolerance approach to sexual harassment and appropriate measures are in place to protect members of our workforce against third party sexual harassment.

We expect our suppliers to be committed to acting ethically and with integrity in all their business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery or human rights abuses are not taking place in their businesses and supply chains.

Edwin has a separate Modern Slavery Statement which can be accessed here.

The terms of the Modern Slavery Statement are to be read as being additional to the following supplier requirements:

- To ensure that products, services and facilities are not used for or do not contribute to human trafficking or slavery or other exploitation
- To prohibit forced labour and human trafficking in your supply chain, employment decisions must be based on free choice, and there may be no human trafficking, involuntary, coerced slavery or prison labour
- To include verification of employees' legal right to work in the country and ensure that all mandatory documents, such as work permits, are available
- To ensure that all work is undertaken without coercion or any form of forced, bonded, indentured or involuntary labour
- At no time to withhold the employee's original identification or travel documents. Suppliers shall provide all employees with a written contract in a language understood by them. The content should also be explained verbally in clear and understandable terms. The contract shall clearly state the voluntary nature of employment and procedures of leaving the job

- To prohibit the use of child labour. Suppliers must adhere to the minimum employment age limit defined by national law or regulation and comply with relevant International Labour Organization

(ILO) standards. In no instance shall a supplier permit children to perform work that exposes them to undue physical risks that can harm physical, mental or emotional development or improperly interfere with their schooling needs

- To implement policies and procedures which set out the company's approach to ensuring zero engagement in, or support of forced labour or unlawful child labour
- To ensure that all employees receive at least the legally mandated minimum wages, benefits and time off and guarantee equal remuneration for equivalent work
- To pay wages and benefits on time, regularly and in a transparent way
- To follow applicable laws and regulation with respect to working hours and working environment and conditions
- To ensure all employees' overtime is voluntary and compensated in accordance with applicable laws
- To ensure that any third-party recruitment agencies it uses are compliant with the provisions of this code and any applicable law
- To respect the rights of employees to join or refrain from joining worker organisations and will allow workplace access for such organisations to facilitate their representative functions
- To not discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law in any jurisdiction in which the supplier operates, in hiring and other employment practices
- To ensure all employees are treated with dignity and respect and will not be subject to any form of unethical treatment, threats of violence, or other forms of physical, mental, or sexual harassment
- To communicate clear and uniformly applied grievance procedures and a system that allows employees to anonymously report any concerns
- To ensure disciplinary policies and procedures regarding any form of unethical treatment are clearly defined and communicated to all employees

## Health, safety and welfare

The health, safety and well-being of employees is of paramount importance to Edwin. Safe working is an integral part of our culture, our purpose, our sustainability and is central to our business strategy. We expect suppliers to put safety first with an aspirational goal to prevent all injuries, occupational illnesses and safety incidents.

Edwin expects its suppliers to commit to providing their employees with serviceable, safe, secure and health working conditions, and to comply with all relevant health and safety laws and regulations applicable to their location, and to operate in a manner that is safe.

We expect our suppliers to:

- comply with all applicable workplace relations, work health and safety, and employees' compensation laws, regulations, codes and guidelines
- provide a safe and healthy workplace for all employees, partners, stakeholders, and any subcontractors
- have a documented and compliant Health and Safety policy and programme in place that sets out arrangements for the identification, management, and control of hazards and risks associated with the activities/services to be provided
- establish a Health and Safety committee with employee representation to manage health and safety issues, even when not required by law
- train employees appropriately on all occupational health and safety topics in a language they understand

- take proactive measures that support accident prevention and minimize health risk exposure, and have systems to report, investigate and take action with regard to all incidents and near misses
- do everything reasonably practicable where goods are consigned, packed, loaded or received as a part of the Supplier's business to ensure that breaches of any heavy vehicle national laws (including, but not limited, to fatigue management; mass, dimension and loading; vehicle standards and maintenance) do not occur
- ensure employees have appropriate personal protective equipment, machine and safety equipment as well as instructions on their proper use
- work to actively identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills
- identify load ergonomic risks pertaining to conditions that can affect muscles and joints in the human body such as working position, repetitive movements, physical load and lifting positions
- give employees the right to refuse and report unsafe situations without any reprisals
- identify and inform us of any incidents that may affect us and do so in a timely manner

## Supply chain

A sustainable supply chain is essential to our sustainability strategy. Our suppliers are required to uphold responsible business practices throughout their own supply chain by encouraging the same of their next-level suppliers.

We expect our suppliers to:

- treat suppliers fairly and with respect
- manage suppliers appropriately to mitigate supply chain risks through fit-for-purpose governance
- ensure adherence to all relevant legislative and regulatory requirements
- have clear and unbiased payment policies for your own suppliers
- stay up to date with industry standards and best practices
- ensure efforts are made towards supply chain optimisation to ensure effectiveness, sustainability, growth, coordination, robustness and responsiveness
- manage open and transparent methods of communication with suppliers to encourage operational improvements and efficiency of performance

## Ethical business practice

Our corporate conduct is based on our commitment to act professionally, transparently, fairly and with integrity and to actively seek to avoid the appearance of any wrongdoing. It is better to miss out on business or incur additional costs than be involved in corrupt practices.

Edwin is committed to conducting all our business activities to the expected standard of professionalism and ethical conduct. We endeavour to support and improve the communities where we operate from an environmental, social and economic perspective. Edwin expects all suppliers and employees to act honestly, ethically and with integrity in all business transactions and activities.

Edwin has a separate Corporate Criminal Offence Policy which can be accessed here.

## Anti-bribery and corruption

Edwin has a zero tolerance of bribery or corruption. We support national and international efforts to protect competition from the distorting effects of corruption and reject all corrupt practices and forms of behaviour which could damage the company.

Edwin will not offer, give or receive, either directly or through any third party, any financial or other advantage to obtain new business, retain existing business or secure any other improper advantage and we will not permit others to do so.

We expect our suppliers to:

- have a policy or statement that covers adherence to local laws, bribery and corruption, and business integrity
- maintain accurate records of activities and performance that clearly demonstrate compliance with all applicable standards, regulations and Edwin requirements
- uphold and promote honesty and integrity in business conduct including through the regular training of employees
- ensure that employees, subcontractors and other representatives do not grant, offer or accept bribes, facilitation payments, inadmissible donations or other inadmissible payments or undue benefits to or from clients, officials or other business partners
- refrain from either directly or indirectly promising, offering, or providing any improper advantage to any person or entity associated with Edwin or our business
- notify us immediately of any incidents of bribery and any suspicions about bribery and corruption that relate to Edwin business, including:
  - if any of the supplier's directors, officers or employees have a relationship with any Edwin representative that could result in a conflict of interest.
  - if any demands or requests received from any Edwin representative deem to be improper or inappropriate
- provide an anonymous complaint mechanism for employees to report workplace grievances, misconduct or unethical behaviour in accordance with local laws and regulations
- maintain whistle-blower confidentiality and protect whistle-blowers from any negative repercussions

## Gifts, hospitality and invitations

Edwin prohibits the offer or receipt of gifts, hospitality or expenses whenever they could affect or be perceived to affect the outcome of a business transaction. Promotional expenditures of this type are only considered legitimate where they are open and transparent, proportionate, reasonable, accords with general business practice and are made in good faith for a legitimate business purpose and not where they place the recipient under any obligation or create any expectation in the giver. Cash gifts, regardless of value, will never be accepted.

We expect our suppliers to:

- not offer Edwin employees or any other business partners any inappropriate benefits either directly or indirectly in the form of gifts, hospitality, or invitations to unduly influence them
- not ask for or accept any inappropriate benefits or gifts

## Fair competition

Fair competition is vital to our success, and we will not enter into any anti-competitive business practices with our suppliers. Edwin requires its suppliers to comply with valid and applicable competition and antitrust laws. In particular, suppliers will not conclude anti- competitive agreements with competitors, suppliers, clients or other third parties and will not abuse a dominant market position.

We expect our suppliers to:

- promote vigorous, open, honest and fair competition and to conduct business in accordance with all applicable anti-competition or anti-trust law and regulations
- not engage in business practices that will restrict or limit competition
- not discuss or reach an understanding or arrangement with a competitor about supplies, prices, terms, tenders, other competitors, or other factors relevant to competition
- employ fair business practices including accurate and truthful advertising

## Conflict of interest

A conflict of interest may occur when an Edwin employee's personal interests interfere or appear to interfere with the Group's interests. Perceived conflicts of interest can be as damaging as actual conflicts. Suppliers and Edwin employees must avoid the appearance of impropriety at all times. In addition, Edwin employees with authority in the procurement process have a special responsibility to avoid the appearance of impropriety.
Procurement authority is defined as being engaged in the source selection and/or negotiation process with Suppliers, as well as being in a position to determine that goods and services delivered meet the stated requirements.

We expect our suppliers to:

- disclose any personal relationships, economic interest or other links to your business held by an employee or contractor with Edwin
- disclose, as soon as becoming aware of, and take reasonable steps to avoid, any conflict of interests (real or apparent)

## Confidentiality and provision of information

A respect for confidentiality builds and develops trust. It allows for the free flow of information and enables a successful collaborative partnership.

We expect our suppliers to:

- receive confidential information only as authorised by a confidentiality or non-disclosure agreement and comply with the obligations to not disclose the confidential information, to not use the information except as permitted by the agreement, and to protect the information from misuse or unauthorised disclosure
- maintain adequate records and documentation that accurately record all transactions and information regarding business activities with Edwin and make this information available to Edwin on request
- protect the personal data of employees, former employees, clients, and other persons concerned
- only collect, process, use and store personal data where there is the consent of the person concerned, a contractual agreement or some other legal basis.

- provide timely and accurate disclosure of or access to material or other information, including with regards to a supplier's policies of insurance, as requested by Edwin
- not give false or misleading information to Edwin
- ensure that confidential business information or trade secrets gained by virtue of the business activities with us is held in strict confidence and not improperly used or disclosed to third parties
- restrict access to confidential information on a need-to-know basis.
- raise any concerns regarding disclosure with us prior to releasing information to third parties
- not use the Edwin brand in promotional or business activities without obtaining prior written permission from us
- notify Edwin of any breach of this Supplier Code of Conduct of which the Supplier is, or becomes aware

## Environmental management

Our objective is to reduce the direct impacts of our operations and services, and to produce more sustainable solutions for our clients. We aim to ensure a sustainable future for our business, and for the communities in which we operate.

We expect suppliers to support environmental stewardship and be responsible and proactive in managing and reducing their environmental impact.

We expect our suppliers to:

- undertake all business activities with care for the environment and at a minimum comply with all applicable environmental laws and regulations
- comply with all applicable environmental regulation including obtaining all required environmental permits, licences, information registrations and restrictions and follow any operational and reporting requirements
- adopt a written Environmental Policy which is appropriate and relevant for your operations
- develop a sustainability strategy which sets out how your organisation is working to reduce your environmental impacts and support the transition to a low-carbon economy
- implement and maintain an appropriate environmental management system which is at least comparable to the ISO14001 standard, ideally with third-party certification
- train employees and provide the necessary resources to make them aware of their personal environmental responsibilities in protecting the environment.
- implement policies and procedures to improve energy efficiency and/or reduce greenhouse gas emissions
- develop systematic policies and procedures to continuously eliminate or reduce waste in terms of both the resources and/or materials consumed by any process in the extended supply chain. When waste cannot be avoided, we expect suppliers to focus first on reusing materials, second on proper recycling methods and last on proper disposal, diverting as much waste as possible from landfill
- manage hazardous material in line with applicable laws, regulations, standards and best practice
- eliminate the consumption and receipt of 'single-use' plastics
- optimise fit for purpose packaging to minimise environmental impact and waste
- continually strive to conserve natural resources including water, fossil fuels, minerals, and virgin forest products by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means

- monitor and reduce energy consumption and advance to the use of renewable and alternative energy sources for operations and logistics
- promote circularity and closed loop systems by supporting the use of sustainable, renewable natural resources while reducing emissions, pollution, and waste
- seek to secure raw materials from fully traceable, sustainable sources
- measure, manage and disclose environmental impacts in areas such as Greenhouse Gas (GHG) emissions, water, and waste and set targets and implement action plans for reducing environmental impacts
- track Scope 1 and 2 greenhouse gas emissions as a minimum and upon request, share Scope 1 and 2 greenhouse gas emissions data with Edwin
- aspire to provide quality assured carbon footprint information for the products and services provided to Edwin, in the form of Life Cycle Analysis (LCA)

## Our commitment to you

Edwin will

- Live by our values and behaviours by being one team, owning the outcome, driving progress, showing respect and delivering Net Zero solutions
- Build strong relationships, ensuring our suppliers understand and deliver to the needs of our clients and our business.
- Collaborate with you and your teams to share expertise, ensuring the delivery of high-quality products and services whilst managing and mitigating associated risks.
- Providing clear guidance about our payment procedures.
- Keeping this Code up to date, ensuring it is aligned with our approach to responsible business and sustainability

## CONTACT US

If you have a concern regarding any of the requirements outlined in this document, please contact us using the details below.

Jo Betteley

Director of Operations

jo@edwin.group

## Declaration of the supplier

We hereby confirm receipt of the Supplier Code of Conduct and undertake to comply with the principles and requirements of the Supplier Code of Conduct. We also confirm that by signing this Supplier Code of Conduct, it will form part of the existing contractual relationship(s) between us and Edwin. If there are conflicts between the Supplier Code of Conduct and the existing contractual relationship(s), the relevant further regulation shall apply.

Place, date

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Supplier (company stamp and signature)

_____

Name (block letters)