SUPPLIER CODE OF CONDUCT

Minimum standards, proportionate sustainability expectations and supplier improvement

CLIENT / DOCUMENT OWNER	EXTERNAL SUPPLIER DOCUMENT
FENTON PHARMACEUTICALS LTD	**Version 2.0 | Final**

Developed with guidance from

Beyond Procurement

www.beyondprocurement.co.uk

DOCUMENT CONTROL

Document owner	**FENTON PHARMACEUTICALS LTD**
Executive Sponsor	Graham Hill, Managing Director / Owner
Policy owner	Graham Hill, Managing Director / Owner
Operational coordinator	Nominated Person
Approved by	Managing Director / Owner
Status	Final
Version	2.0
Effective date	01/09/2026
Review date	31/08/2027
Review cycle	Annually
Classification	External supplier document
Developed with guidance from	Beyond Procurement

Version history

Version	Date	Change	Approved by
2.0	01/09/2026	Rewritten to align with the Sustainability & ESG Policy, current Carbon Reduction Plan, proportionate supplier requirements and Beyond Sustainability Hub support.	Graham Hill

CONTENTS

PART ONE - PURPOSE AND APPLICATION

1. Purpose and status
2. Scope
3. Our supplier principles
4. Proportionate application

PART TWO - MANDATORY MINIMUM STANDARDS

5. Legal and ethical conduct
6. Human rights and labour standards
7. Health, safety and wellbeing
8. Equality, dignity and fair treatment
9. Environmental compliance and protection
10. Data protection, confidentiality and information security

PART THREE - SUSTAINABILITY AND SUPPLY-CHAIN IMPROVEMENT

11. Carbon measurement and reduction
12. Responsible sourcing and circularity
13. Climate and operational resilience
14. Subcontractors and lower-tier supply chains
15. Beyond Sustainability Hub support

PART FOUR - EVIDENCE, MONITORING AND ENFORCEMENT

16. Information and evidence
17. Due diligence, monitoring and audit
18. Non-conformance and corrective action
19. Reporting concerns
20. Review, acceptance and acknowledgement

Appendix A - Proportionate supplier expectations

PART ONE - PURPOSE AND APPLICATION

Why the Code exists, who it applies to and how requirements are applied proportionately.

1. Purpose and Status

This Supplier Code of Conduct (the Code) sets out the minimum legal, ethical, social and environmental standards expected of suppliers, contractors, consultants, agents and other third parties providing goods or services to FENTON PHARMACEUTICALS LTD.

The Code supports FENTON PHARMACEUTICALS LTD's Sustainability & ESG Policy and current Carbon Reduction Plan. It establishes mandatory minimum standards while recognising that carbon and sustainability capability varies by supplier size, sector, risk, impact and maturity.

Our approach
Serious legal, ethical, human-rights and safety requirements are mandatory for every supplier. Additional carbon, data and improvement requirements are applied proportionately, focusing effort on suppliers and categories with the greatest impact, risk or strategic importance.

The Code forms part of the basis on which FENTON PHARMACEUTICALS LTD manages supplier relationships. Specific contractual, technical, regulatory or customer requirements may impose additional obligations and will take precedence where they are more demanding.

2. Scope

The Code applies to all organisations and individuals supplying goods or services to FENTON PHARMACEUTICALS LTD. Suppliers are expected to communicate equivalent principles to relevant subcontractors and supply-chain partners, proportionate to the nature, risk and significance of the work they perform.

- Suppliers must comply with the laws and contractual requirements applicable to their activities and locations.
- Suppliers must provide accurate information and must not knowingly conceal material legal, ethical, environmental, safety or data concerns.
- Where local law provides a lower standard than this Code, suppliers are expected to meet the Code where legally permissible.
- Where a supplier cannot meet a requirement immediately, it must disclose the gap and cooperate on a proportionate corrective-action or improvement plan.

3. Our Supplier Principles

Principle	Expected approach
Integrity	Act lawfully, honestly and transparently; prevent bribery, fraud, conflicts and misleading information.
Respect for people	Protect human rights, fair work, dignity, equality, safety and wellbeing.
Environmental responsibility	Prevent harm, comply with environmental obligations, measure material impacts and reduce resource use and emissions.
Proportionality	Respond to requirements according to the supplier's impact, risk, size, contract and maturity.
Collaboration	Work openly with FENTON PHARMACEUTICALS LTD and use guidance and support to improve rather than treating sustainability solely as a compliance exercise.
Continuous improvement	Strengthen data, controls, capability and performance over time and evidence material progress.

4. Proportionate Application

The same mandatory legal and ethical minimums apply to all suppliers. Additional sustainability expectations may vary according to:

- contract value, duration and business criticality;
- estimated greenhouse gas emissions and environmental impact;
- sector, geography, labour and human-rights risk;
- access to sensitive data, systems, sites or customers;

- supplier size, capability and maturity;
- availability and quality of primary emissions data;
- customer, tender, public procurement or regulatory requirements; and
- the supplier's ability to influence its own supply chain.

Appendix A explains the normal expectations for all suppliers, relevant or higher-impact suppliers, and strategic or priority suppliers.

PART TWO - MANDATORY MINIMUM STANDARDS

Requirements that apply to every supplier, irrespective of size or carbon-accounting maturity.

5. Legal and Ethical Conduct

- Comply with all applicable laws, regulations, permits, professional requirements and contractual obligations.
- Conduct business honestly, fairly and transparently and maintain accurate books, records and supporting information.
- Prohibit bribery, corruption, fraud, money laundering, tax evasion facilitation, kickbacks and improper facilitation payments.
- Identify and disclose actual, potential or perceived conflicts of interest that could influence decisions.
- Compete fairly and comply with applicable competition and sanctions requirements.
- Protect FENTON PHARMACEUTICALS LTD assets and use them only for authorised purposes.
- Do not make misleading, unsupported or exaggerated environmental, social, product or carbon claims.
- Notify FENTON PHARMACEUTICALS LTD promptly of a material legal, ethical or regulatory breach relevant to the supplier relationship.

6. Human Rights and Labour Standards

Suppliers must respect internationally recognised human rights and maintain employment practices consistent with applicable law and relevant International Labour Organization principles.

- Employment must be freely chosen. Forced, bonded, trafficked, prison or involuntary labour is prohibited.
- Child labour is prohibited. Young workers must be protected and employed only in accordance with applicable law.
- Workers must receive legally compliant terms, wages, benefits, working hours, rest and leave.
- Recruitment fees, unlawful withholding of identity documents and coercive deposits are prohibited.
- Workers must be able to raise concerns without retaliation and exercise lawful freedom of association and collective bargaining rights.
- Suppliers must assess and address modern-slavery and human-rights risks within relevant operations and supply chains.

7. Health, Safety and Wellbeing

- Provide a safe and healthy workplace and comply with all applicable health and safety requirements.
- Identify hazards, assess risks and implement effective controls before work begins.
- Provide competent supervision, appropriate training, safe equipment and suitable personal protective equipment.
- Maintain emergency, incident-reporting and business-continuity arrangements proportionate to the work.
- Investigate material incidents and near misses and implement corrective action to prevent recurrence.
- Manage fatigue, occupational health and wellbeing risks, including those arising from travel, working hours and workplace conduct.
- Meet any additional site, customer or project safety requirements communicated by FENTON PHARMACEUTICALS LTD.

8. Equality, Dignity and Fair Treatment

- Provide a workplace free from unlawful discrimination, harassment, bullying, abuse and degrading treatment.

- Promote fair access to recruitment, pay, development and progression based on relevant merit and capability.
- Make reasonable adjustments and provide accessible arrangements where required by law.
- Treat workers, subcontractors, customers and communities with dignity and respect.
- Maintain appropriate grievance and disciplinary processes and prohibit retaliation against good-faith concerns.

9. Environmental Compliance and Protection

- Comply with applicable environmental laws, permits, consents and waste-management requirements.
- Identify and control significant environmental aspects, including energy, emissions, water, waste, materials, pollution and biodiversity where relevant.
- Prevent uncontrolled releases, spills and pollution and maintain appropriate response arrangements.
- Handle hazardous substances and waste safely, lawfully and with traceable documentation.
- Use natural resources efficiently and apply the waste hierarchy of prevention, reduction, reuse, recycling, recovery and responsible disposal.
- Notify FENTON PHARMACEUTICALS LTD promptly of a material environmental incident connected to the goods or services supplied.

10. Data Protection, Confidentiality and Information Security

- Protect confidential, commercially sensitive and personal information against unauthorised access, loss, misuse or disclosure.
- Comply with applicable data-protection, privacy and information-security requirements, including UK GDPR where applicable.
- Use FENTON PHARMACEUTICALS LTD information only for the authorised purpose and retain it only for as long as required.
- Maintain security controls proportionate to the data, systems and services accessed.
- Notify FENTON PHARMACEUTICALS LTD promptly of an actual or suspected material data or cyber-security incident affecting the relationship.
- Ensure subcontractors with access to data or systems are subject to appropriate equivalent obligations.

PART THREE - SUSTAINABILITY AND SUPPLY-CHAIN IMPROVEMENT

Proportionate expectations that help reduce client and supplier impacts while building capability.

11. Carbon Measurement and Reduction

Suppliers must comply with environmental law. Additional carbon expectations are applied according to impact, risk, contract and maturity rather than imposed identically on every supplier.

- Provide accurate activity, product, service or organisational emissions information reasonably requested by FENTON PHARMACEUTICALS LTD.
- Explain the reporting boundary, period, method, factor source and material limitations of supplier-provided carbon data.
- Measure organisational greenhouse gas emissions and maintain a Carbon Reduction Plan where this is proportionate or required by law, contract, customer requirement, procurement procedure or material impact.
- Where PPN 006 applies to a relevant procurement, meet the current Carbon Reduction Plan technical and publication requirements.
- Set practical reduction objectives and implement actions in material areas such as energy, fleet, travel, materials, waste, logistics and purchased goods.
- Increase the proportion of primary, product-specific and supplier-specific information over time.
- Support the targets and priorities stated in FENTON PHARMACEUTICALS LTD's current Carbon Reduction Plan where relevant to the supplied goods or services.
- Do not present offsets or carbon credits as a substitute for feasible emissions reduction.

Why supplier data matters
Supplier information feeds directly into FENTON PHARMACEUTICALS LTD's Scope 3 inventory, Carbon Reduction Plan, procurement decisions, customer reporting and reduction programme. Data requests will be prioritised and proportionate, and suppliers will be offered guidance where appropriate.

12. Responsible Sourcing and Circularity

- Source materials lawfully and responsibly, with due regard to human-rights, conflict, environmental and traceability risks.
- Avoid materials from conflict-affected or high-risk sources unless appropriate due diligence and responsible sourcing controls can be evidenced.
- Consider whole-life cost, durability, repairability, reuse, recycled content and end-of-life recovery when designing or supplying goods and services.
- Reduce unnecessary packaging and use reusable, recyclable or lower-impact alternatives where practical.
- Provide environmental product declarations, product carbon footprints, recycled-content evidence or certification where relevant and available.
- Cooperate in identifying cost-and-carbon reduction opportunities, specification improvements and lower-impact alternatives.

13. Climate and Operational Resilience

- Identify material physical and transition climate risks that could affect delivery, quality, availability, cost or safety.
- Maintain business-continuity and emergency arrangements proportionate to the criticality of the goods or services supplied.
- Disclose material dependencies, single points of failure or geographic risks where these could materially affect FENTON PHARMACEUTICALS LTD.
- Notify FENTON PHARMACEUTICALS LTD promptly of a disruption or emerging risk likely to affect contractual delivery.
- Work collaboratively on reasonable mitigation, alternative sourcing, inventory, logistics or continuity measures.

14. Subcontractors and Lower-tier Supply Chains

Suppliers remain responsible for the performance of subcontractors used to deliver their obligations to FENTON PHARMACEUTICALS LTD.

- Select and manage subcontractors using risk-based due diligence.
- Communicate equivalent legal, ethical, safety, human-rights and environmental principles to relevant lower-tier partners.
- Do not use unauthorised subcontractors where contractual approval is required.
- Maintain appropriate traceability for high-risk materials, labour and critical services.
- Cooperate with proportionate supply-chain mapping and information requests.

15. Beyond Sustainability Hub Support

FENTON PHARMACEUTICALS LTD recognises that suppliers, particularly SMEs, may need practical support to understand and respond to carbon and sustainability requirements. Relevant suppliers will be invited to use the Beyond Sustainability Hub.

- The Hub provides structured guidance, templates and role-relevant learning.
- Suppliers may access webinars, clinics, specialist support and peer learning.
- Maturity-based resources help suppliers progress from initial awareness to measurement, action and embedded improvement.
- Procurement and sustainability resources help identify opportunities to reduce both cost and carbon.
- Hub participation, evidence and improvement may be considered as part of supplier engagement and review.

The availability of support does not remove the supplier's responsibility to comply with mandatory requirements or provide accurate information.

PART FOUR - EVIDENCE, MONITORING AND ENFORCEMENT

How compliance, improvement and serious failures are assessed and managed.

16. Information and Evidence

- Suppliers must provide accurate, complete and timely information reasonably required for due diligence, carbon accounting, contractual reporting or risk management.
- Evidence may include policies, licences, certifications, training records, incident data, carbon calculations, activity data, product information and corrective-action records.
- A supplier must explain material assumptions, estimates, boundaries and limitations in carbon or sustainability information.
- Information will be handled appropriately and used for supplier management, carbon measurement, improvement, risk, contractual and customer-reporting purposes.
- Knowingly providing false or materially misleading information is a serious breach of this Code.

17. Due Diligence, Monitoring and Audit

FENTON PHARMACEUTICALS LTD may assess compliance and improvement using a proportionate, risk-based approach. This may include questionnaires, document review, meetings, Hub engagement, performance data, site visits or audits where contractually permitted.

- Monitoring will consider the supplier's size, risk, impact, criticality, performance and prior issues.
- Reasonable notice will normally be provided unless urgency, safety, suspected misconduct or contractual rights justify otherwise.
- Confidential and personal information will be protected, and requests will be limited to information reasonably connected to the relationship.
- Suppliers must cooperate and must not obstruct or falsify a legitimate review.

18. Non-conformance and Corrective Action

Where a gap is identified, FENTON PHARMACEUTICALS LTD will normally seek clarification and proportionate improvement before considering exclusion, unless the matter is sufficiently serious to require immediate escalation.

1. Clarify the issue, evidence and potential impact.
2. Provide or direct the supplier to relevant guidance and support where appropriate.
3. Agree a corrective-action or improvement plan with owners, evidence and timescales.
4. Monitor progress and verify closure.
5. Escalate repeated, overdue or material failures through contractual or governance routes.
6. Suspend or terminate the relationship where required by law or justified by serious legal, ethical, human-rights, safety, fraud, data or contractual breaches.

19. Reporting Concerns

Suppliers and their workers are encouraged to report suspected illegal, unethical, unsafe or materially misleading conduct connected to the relationship with FENTON PHARMACEUTICALS LTD.

- Concerns raised in good faith will be handled sensitively and without retaliation, subject to applicable law and procedure.
- Immediate safety, criminal or regulatory risks should also be reported to the appropriate authority where required.

20. Review, Acceptance and Acknowledgement

This Code will be reviewed at least annually and may be updated when laws, customer requirements, the Sustainability & ESG Policy, the Carbon Reduction Plan or the Beyond Sustainability Hub change materially.

FENTON PHARMACEUTICALS LTD approves and issues the Code; suppliers do not approve or sign it. Requirements are communicated through contracts, purchase orders, specifications, onboarding and normal supplier-management channels.

Appendix A - Proportionate Supplier Expectations

Expectation	All suppliers	Relevant / higher-impact suppliers	Strategic / priority suppliers
Legal, ethical, human-rights and safety minimums	Mandatory	Mandatory	Mandatory
Environmental legal compliance and incident reporting	Mandatory	Mandatory	Mandatory
Accurate requested carbon/activity information	Where relevant to supply	Required	Required with defined data-improvement plan
Participation in Beyond Sustainability Hub	Invited where useful	Normally expected	Expected unless an equivalent programme is agreed
Organisational carbon footprint	Encouraged	Expected where material and proportionate	Normally required
Carbon Reduction Plan and targets	Where required by law or contract	May be required	Normally required where emissions are material
Supplier/product-specific emissions data	Where available	Improvement priority	Required for agreed material categories where feasible
Corrective or improvement plan	Where a gap exists	Where a gap or data priority exists	Formal plan, milestones and periodic review where required