



COACH HOUSE

SUPPLIER CODE OF CONDUCT

1 . PURPOSE

At Coach House we are committed to conducting business responsibly, ethically, and sustainably. This Supplier Code of Conduct (“Code”) sets out the minimum standards expected of all suppliers, contractors, subcontractors, agents, and service providers (“Suppliers”) who provide goods or services to Coach House. Suppliers must comply with all applicable laws and regulations in the countries where they operate and adhere to the standards outlined in this Code.

2. LEGAL COMPLIANCE

Suppliers shall:

- Comply with all applicable laws, regulations, and industry standards.
- Maintain all necessary licences, permits, approvals, and registrations.
- Operate with honesty, integrity, and transparency.

3. HUMAN RIGHTS AND LABOUR STANDARDS

Suppliers shall respect internationally recognised human rights and comply with applicable employment legislation.

3.1 MODERN SLAVERY AND FORCED LABOUR

Suppliers shall:

- Prohibit all forms of slavery, servitude, forced labour, bonded labour, and human trafficking.
- Comply with the requirements of the UK Modern Slavery Act 2015 where applicable.
- Ensure workers are free to leave employment after reasonable notice without penalty.
- Not retain workers’ passports, identity documents, or personal property.
- Workers shall not be required to pay recruitment fees or other costs to obtain employment.
- Provide workers with written terms and conditions of employment.

3.2 CHILD LABOUR

Suppliers shall:

- Not employ anyone below the legal minimum working age.
- Comply with all applicable laws relating to young workers.
- Ensure young workers are not exposed to hazardous work.

3.3 EQUALITY, DIVERSITY AND INCLUSION

Suppliers shall:

- Provide equal opportunities in recruitment, promotion, compensation, and training.
- Not discriminate based on age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- Promote a workplace culture based on dignity, respect, and inclusion.

3.4 HARASSMENT AND ABUSE

Suppliers shall:

- Provide a workplace free from bullying, harassment, intimidation, violence, and abuse.
- Treat all workers fairly and with respect.

3.5 FREEDOM OF ASSOCIATION

Suppliers shall:

- Respect employees' rights to join or not join trade unions.
- Respect employees' rights to collective consultation and collective bargaining where permitted by law

4. WAGES, BENEFITS AND WORKING HOURS

Suppliers shall:

- Pay wages that meet or exceed applicable legal requirements.
- Provide statutory benefits and entitlements.
- Ensure working hours comply with applicable legislation.
- All overtime shall be voluntary and compensated in accordance with legal requirements and employment agreements.

5. HEALTH, SAFETY AND WELLBEING

Suppliers shall:

- Provide a safe and healthy working environment.
- Comply with applicable health and safety legislation.
- Identify and manage workplace risks.
- Provide appropriate training, supervision, and personal protective equipment (PPE).
- Maintain emergency preparedness and incident reporting procedures.

6. ENVIRONMENTAL RESPONSIBILITY

Suppliers shall:

- Comply with applicable environmental legislation and permits.
- Manage environmental impacts arising from their operations.
- Seek opportunities to reduce energy consumption, waste generation, emissions, and water use.
- Promote sustainable use of natural resources.
- Handle and dispose of hazardous substances responsibly.

7. ETHICAL BUSINESS PRACTICES

7.1 ANTI-BRIBERY AND CORRUPTION

Suppliers shall:

- Comply with the UK Bribery Act 2010 and applicable anti-corruption laws.
- Prohibit bribery, facilitation payments, kickbacks, extortion, and fraud.
- Maintain appropriate controls to prevent corruption.

7.2 GIFTS AND HOSPITALITY

Suppliers shall:

- Ensure gifts, hospitality, or entertainment are reasonable, transparent, and not intended to improperly influence business decisions.

7.3 CONFLICTS OF INTEREST

Suppliers shall:

- Avoid actual, potential, or perceived conflicts of interest.
- Disclose any conflicts that may affect their relationship with Coach House.

7.4 COMPETITION AND FAIR BUSINESS PRACTICES

Suppliers shall:

- Conduct business fairly and ethically.
- Comply with applicable competition and anti-trust laws.

8. DATA PROTECTION AND CONFIDENTIALITY

Suppliers shall:

- Protect confidential information belonging to Coach House its customers, and business partners.
- Comply with applicable data protection laws, including UK GDPR and the Data Protection Act 2018.
- Implement appropriate technical and organisational measures to safeguard personal data.

9. RESPONSIBLE SUPPLY CHAINS

Suppliers shall:

- Communicate the principles of this Code to their own suppliers and subcontractors.
- Undertake reasonable due diligence to identify and manage human rights, labour, environmental, and ethical risks within their supply chains.
- Cooperate with requests for information relating to supply chain compliance.

10. MONITORING AND COMPLIANCE

Suppliers shall:

- Complete due diligence questionnaires when requested.
- Provide relevant policies, procedures, and supporting documentation.
- Participate in announced or unannounced audits or assessments where reasonably required.
- Promptly notify Coach House of any significant breaches of this Code.
- Maintain appropriate grievance mechanisms that allow workers to raise concerns confidentially and without fear of retaliation.

11. CORRECTIVE ACTION

Where non-compliance is identified, Suppliers shall:

- Cooperate in investigating the issue.
- Develop and implement an agreed corrective action plan.
- Demonstrate progress within agreed timescales.

Failure to address material breaches may result in suspension or termination of the business relationship.



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