



DeLaRue

# Supplier Code of Conduct

All De La Rue suppliers must understand and agree to our Supplier Code of Conduct.

01/11/2023

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## 1. Introduction

At De La Rue, we believe that acting ethically and responsibly is not only the right thing to do, but essential for our business. De La Rue's purpose is securing trust between people, businesses and governments. In order to do this, it is critical that we maintain the highest ethical standards in the conduct of our business, are honest and transparent and always act with integrity. Importantly, this approach covers both our own business operations and our wider supply chain.

We have a responsibility to ensure that the third parties we choose to do business with, and the way in which they do business, positively embrace and reflect our corporate values. We seek to work with companies who share similar ethical standards and values to the ones we set out in our Code of Business Principles and this Supplier Code of Conduct ('the Code'), and who will commit themselves to meeting the requirements of the Code and relevant laws.

We are committed to establishing mutually beneficial relations with our suppliers and business partners in order to raise standards, drive sustainable practices and created shared value for all. Our goal is to drive excellence in these areas throughout our own organisation, and to support and work with our suppliers in to improve the supplier's ability to meet these expectations within our supply chain.

We conduct our operations with integrity and in accordance with the principles of fair competition. We strive to do business only with organisations who uphold similar business principles. We adopt a zero-tolerance approach to Modern Slavery, forced labour and bribery and corruption within our supply chain. Any known or suspected ethical risks or breaches of the Supplier Code of Conduct will be investigated and in case of severe non-compliance with our standards which cannot be fixed immediately or where the improvement that we require is not seen in the required timeframe, we will end the relationship.

Please take the time to read and understand this Code, which outlines our core commitments and describes the standards and behaviours we expect of our suppliers and business partners.

Clive Vacher  
Chief Executive Officer



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## 2. Aims of the Code

The Code specifies the minimum standards of behaviour De La Rue expects of our suppliers. The purpose of the Code is to formally communicate these requirements and expectations to our supply chain. Suppliers are required to adhere to with the principles set out in this document, to ensure that all employees or representative involved in De La Rue business are made aware of and comply with the provisions of this Code, and to ensure that the principles set out in this document are adhered to by their own suppliers.

## 3. Definitions

- “De La Rue” and “the Group” means the De La Rue plc Group of companies including any affiliate companies or subsidiaries, either partly or wholly owned.
- “Supplier” means:
  - o any third-party organisation or their subsidiaries, affiliates and sub-contractors; or
  - o any individual acting for and on behalf of De La Rue, or any of its companies.
- “Employees” in relation to De La Rue means any individual directly or indirectly employed by us, including permanently employed or contracted staff, and any representative or agents appointed to act on our behalf.

## 4. Our Supplier Code of Conduct at a Glance

Our Code is based upon the De La Rue Code of Business Principles, which is available upon request or via our website, and has three main pillars, with each pillar supported by action statements and details of the behaviour which we expect of our suppliers:

- **Business Standards:** we expect our suppliers to: avoid any conflict of interest in their business dealings; conduct their business with integrity and full transparency; support us where appropriate in the achievement of our environmental goals; and comply with all applicable laws and regulations.
- **People:** We expect our suppliers to comply with applicable employment laws and to support the protection of human rights, wherever they operate in the world. We expect our suppliers to provide a hygienic, safe and secure environment for all those within their community.
- **Information:** where applicable, we expect our suppliers to manage, use and secure any data received from De La Rue in a way that complies with the law and maintains integrity and reputation. Data should never to be used for personal or commercial gain.



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## **5. The Code**

### **5.1. People**

We promote an inclusive culture that values diversity and ensure that everyone is treated fairly. We expect our suppliers to comply with applicable employment laws and to support the protection of human rights, wherever they operate in the world. We expect our suppliers to provide a hygienic, safe, secure and fair environment for all those within their community.

#### **5.1.1. Health, Safety and Wellbeing**

- De La Rue's suppliers will make proper provision for the health, safety and welfare of their employees, visitors, contractors and those in the community who may be affected by their activities. This applies to physical health, mental health and wellbeing. A safe and healthy working environment should be provided, and best occupational health and safety practice promoted. De La Rue expects complete adherence to any applicable local laws.
- Suppliers are encouraged to implement a health and safety management system and should work towards having a management system such as or similar to the Occupational Health and Safety Assessment Standard (OHSAS) 18001.

#### **5.1.2. Fairness and Respect**

Suppliers are expected to:

- Provide equality of opportunity and treatment regardless of race, colour, gender, gender identity, religion or belief, nationality, national origin, sexual orientation, maternity, age, disability, marital status, trade union affiliation or political affiliations.
- Support equal pay for work of equal value.
- Oppose discrimination or intimidation towards employees including all forms or threats of physical and psychological abuse, and promote work free from harassment, victimisation or any other form of inappropriate behaviour or abuse in any circumstances.

De La Rue recognises the value of diversity and actively seeks to have a diverse workforce and supply base. As part of a supplier's commitment to diversity and equality, suppliers should where possible work with diverse businesses and ensure inclusive sourcing activities and decisions are made when selecting suppliers.

#### **5.1.3. Employment Standards**

De La Rue fully supports the principles set out in the UN Declaration of Human Rights, the United Nations Global Compact and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We require our suppliers to provide fair working conditions to all employees, regardless of their position in the company.

Suppliers should drive active management of their own business and their downstream supply chain in all fundamental aspects mentioned below.



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#### **5.1.3.1. Human Rights and Modern Slavery**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour as well as human trafficking all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to ensuring there is transparency in our own business and supply chain in our approach to tackling modern slavery which is consistent with our disclosure obligations under the UK Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. We impose a condition within our contracting process forbidding the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We expect that our suppliers will apply the same high standards to their own organisations and supply chain.

#### **5.1.3.2. Child Labour**

The use of child labour or practices that inhibit the development of children in any manner, are strictly prohibited. Suppliers must comply with all child labour laws and should not employ anyone under the age of 15, or where it is higher, the mandatory school leaving age in the local country. If a supplier is discovered to be employing young workers De La Rue will seek to withdraw from the contract immediately.

#### **5.1.3.3. Pay and Benefits**

As a minimum, De La Rue expects suppliers to comply with all national regulations on pay and benefits. These should be sufficient to meet basic needs of workers and families. They must be compensated at a minimum in line with local laws for overtime hours worked.

#### **5.1.3.4. Working Hours**

De La Rue's suppliers are expected to comply with national regulations on working hours. Employees should work no more than a 60 hour working week, should have annual leave provision and be permitted at least one non-working day per seven days on average. Any exceptions to this must be clearly defined and permitted by national laws and workers' agreements.

#### **5.1.3.5. Freedom of Association and Collective Bargaining**

Suppliers shall allow workers to associate freely with others, form, and join (or refrain from joining) organisations of their choice, and bargain collectively, without interference, discrimination, retaliation or harassment. In the absence of formal representation, suppliers shall ensure that workers have a mechanism to report grievances, and such system shall facilitate open communication between management and workers.

#### **5.1.3.6. Regular Employment**

Suppliers should aim to avoid the excessive use of non-regular employment (for example fixed-term contracts, zero-hours contracts and contracted labour) and



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should aim to provide regular employment (permanent and direct) to every extent possible.

## **5.2. Business Standards**

Suppliers to De La Rue must not offer gifts or favours to De La Rue's employees that may be seen as an attempt to influence business decisions. All suppliers must conduct their business to a high ethical standard and comply with relevant legislation on bribery, corruption and prohibited business practice, including the UK Bribery Act 2010 and the Criminal Finance Act 2017. We expect our suppliers to support our environmental goals and strive for best practice in environmental management of their own operations.

### **5.2.1. Bribery and Corruption**

A bribe is an offer, promise, or provision of something of value to assist in obtaining or retaining business, or securing an improper advantage either personally or for De La Rue. Corruption is any unlawful or improper behaviour that seeks to gain an advantage through illegitimate means. Bribery, abuse of power, extortion, fraud, deception, collusion, cartels, and money laundering are all forms of corruption. Bribery and corruption are illegal and damage communities, individuals and appropriate commercial interests.

De La Rue does not permit suppliers or anyone acting on their behalf to offer, pay, seek, accept or encourage bribes. This includes gifts, hospitality and entertainment or charitable donations or sponsorship which could be perceived as a bribe. De La Rue makes no distinction between bribes and facilitation payments, which are also prohibited. Any bribes or facilitation payments requested, offered or made in relation to De La Rue business must be reported to local authorities and to De La Rue. We have a zero-tolerance policy to bribery and corruption within our supply chain and any breaches of this policy will result in the termination of our business relationship.

### **5.2.2. Competition**

We are committed to competing in an open and fair manner and comply with all competition and anti-trust laws. All suppliers must only seek to win new business through lawful means. They must not enter into agreements and understandings that are anti-competitive, such as discussions with competitors or their representatives about the following: – Commercial terms, such as prices, fees or rates, discounts, costs, terms and conditions of sale, and warranties – Agreeing prices, agreeing to divide up customers, markets or territories – Current business opportunities and sales or marketing plans.

### **5.2.3. Facilitation of Tax Evasion**

We expect all our suppliers to pay their taxes in accordance with the law. De La Rue will not tolerate the facilitation of tax evasion within our supply chains, and we expect our suppliers to put in place reasonable prevention measures to ensure that they, and any persons associated with them, do not engage in tax evasion or the facilitation of tax evasion.



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#### **5.2.4. Conflicts of Interest**

We expect our suppliers to avoid any conflict of interest in their business dealings, and to ensure that their business relationships with third parties are conducted in a professional, impartial and competitive way.

If suppliers to De La Rue become aware of any conflict or potential conflict of interest in their dealings with De La Rue, they should declare it to their De La Rue contact and the affected party should be removed from any relevant decision-making process.

#### **5.2.5. Environmental Sustainability**

At De La Rue we are committed to behaving in an environmentally responsible manner, reducing our greenhouse gas emissions, utilising natural resources efficiently and preventing pollution in ways that ensure the long-term sustainability of the business, and minimise our impact on the environment.

We expect our suppliers to support our environmental goals, including continual improvement, and policies and align with best practices including the following:

- Comply with all applicable current and future environmental laws, regulations and standards including compliance with industry best practice standards for the responsible sourcing of products and materials such as The Forest Stewardship Council, Fairtrade, labelling and other relevant standards.
- Seeking to reduce negative environmental impacts including the prevention of pollution and providing visibility to progress towards this commitment. We expect our suppliers to encourage the use of environmentally friendly technologies and practices and the reduction of negative environmental impacts throughout their supply chain.
- Reporting their carbon emissions to us when requested, seeking to reduce these emissions and sharing information on how and when they plan to achieve these reductions.

Suppliers are encouraged to implement an environmental management system such as, or similar to, ISO 14001.

A key tool in our work to drive ESG improvements across the De La Rue supply chain is our sustainability rating programme. All suppliers to De La Rue are encouraged to participate in this programme to enable us to build quality data on suppliers' individual sustainability impacts and how these can be reduced, and to actively engage with us in continuous improvement initiatives.

#### **5.2.6. Sanctions**

Suppliers are expected to be aware of and comply with sanctions regimes around the world.



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### **5.3. Information**

We expect our suppliers to maintain accurate, honest, and transparent records of their business dealings with us.

Any personal data suppliers receive through business dealings with De La Rue must only be used for the agreed purpose. Security of such personal data is paramount and as such personal data should be kept securely, protected from unauthorised access or disclosure, and retained only for as long as is necessary to provide the services. Suppliers are required to comply with relevant Data Protection legislation and best practice guidance (as amended and updated from time to time). Specific data protection and information security obligations included in supplier contracts must be strictly complied with.

Suppliers must protect any confidential information supplied by De La Rue. Suppliers are not permitted to disclose their business relationship with De La Rue, or to utilise the De La Rue name or brand in any external communications, without the company's prior written consent.

### **5.4. Compliance with Laws**

All suppliers are expected to comply with all applicable legislation and other legal requirements that apply to them including trade embargoes or sanctions on the organisations or individuals with whom the Supplier engages. We expect our suppliers to comply with the both the letter and the spirit of the law.

## **6. Communication**

We expect our suppliers to make this Code readily available to employees and contractors to ensure relevant employees are able to clearly evidence the values of the organisation. Suppliers should comply with this code and disseminate these appropriate values throughout their own supply chain. De La Rue is open to working collaboratively to ensure the Code is able to be implemented and followed.

## **7. Violation of our Supplier Code of Conduct**

We welcome open, honest discussions with suppliers where they feel they might not be able to fully adhere to the Code and the opportunity to explore solutions to these challenges. Where there is a failure to comply with these standards, De La Rue will endeavour to resolve the potential issue by working closely with the supplier. If a supplier continually breaches this Code or refuses to comply we will re-evaluate our business relationship. A breach of an applicable law will result in termination as a De La Rue supplier and a referral of the matter to appropriate authorities.

## **8. Reporting Suspected Violations of the Code**

Suppliers, employees or contractors may report suspected violations of this Code to the De La Rue Procurement team at the following email address: [group.procurement@delarue.com](mailto:group.procurement@delarue.com). All such reports are treated as confidential and may remain anonymous where permitted by law.



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Alternatively, where wrongdoing is seen or suspected, concerns may be reported in confidence to the De La Rue Whistleblowing hotline, known as the De La Rue CodeLine: By telephone: UK Freephone 0800 915 1571, or Outside UK +44 191 516 7749 Online: <http://www.safecall.co.uk/report>

## 9. Review

1. De La Rue will review this policy bi-annually and may at any time withdraw this policy or publish replacement or revised versions to reflect developments in the business, or changes to legislation or procedures.
2. Printed copies of this document are uncontrolled copies of a controlled document. The current version of the policy can be requested by e-mailing: [group.procurement@delarue.com](mailto:group.procurement@delarue.com)





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## Document Control

No information in this document will be published or disclosed wholly or in part to any other party without the prior permission of De La Rue Group Director of Procurement in writing.

The Procurement Department is responsible for implementing, reviewing and maintaining this policy, and ensuring it remains current.

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January 2020	Daniel Cox	V1.1	First version
September 2020	Jonathan Dee	V2.0	Addition of Code of Business Principles hyperlink, removal of supplier signature section, font changed to Arial.
April 2021	Jonathan Dee	V2.1	Updated to include new Careline number and web link
October 2023	Carolyn Dixey	V3.0	Updated content to reflect the updated Code of Business Principles; updated branding.

## Reviewers

Name	Position
Carolyn Dixey	Group Ethics Director
Stephen Stuart	Head of Indirect & Authentication Procurement
Jon Gregory	Head of Currency Procurement

## Document Validity Period

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