



**THE MILES
CONSULTANCY**

TMC Supplier Code of Conduct

tmc

The Miles Consultancy

Introduction

The Miles Consultancy Limited and its affiliates (together “TMC”) is committed to promoting a positive work environment and maintaining the highest levels of ethics and integrity and requires its suppliers (“Suppliers”) to be committed to these same principles. Our goals are to operate a sustainable, ethical and fair business and to ensure that those we work with do the same. Maintaining integrity in dealings with employees, customers, business partners, shareholders and the general public is an indispensable part of the TMC culture and is essential to provide fair, reliable and innovative services.

This Supplier Code of Conduct (also referred to as “this Code”) sets out TMC’s minimum standards to which it expects Suppliers to adhere. By becoming or continuing to be a Supplier of TMC, Suppliers commit to comply with this Code and TMC trusts Suppliers to do so and to notify TMC if there is any breach, failure or inability to do so.

We expect our Suppliers to comply with all laws, regulations and industry standards applicable to them as well as the requirements of this Code and to ensure that their subcontractors do the same. Suppliers are expected to educate their staff and other representatives to ensure they are meet these expectations and promote the requirements of this Code.

Suppliers are expected to comply with both the spirit and the letter of this Code. In case of any uncertainty or immediately on becoming aware of any matter that may contravene the requirements of this Code, Suppliers should contact legal@tmc.co.uk

Suppliers will cooperate and comply with any information requests or audits of their compliance with this Code. Suppliers acknowledge that TMC may terminate any contract or relationship with Suppliers who fail to cooperate and/or breach this Code, in accordance with the terms of the contract between the parties.

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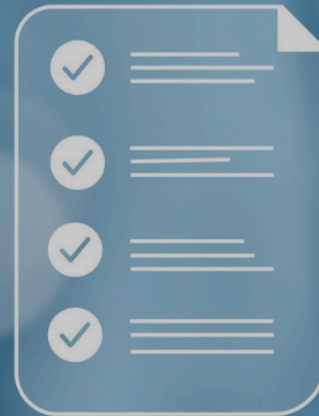
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Human Rights & Child Protection

It is fundamental to TMC's continued success and the sustainability of the communities where we do business to ensure people are treated with dignity and respect. To that end, we will work only with Suppliers who respect human rights, diversity and equal opportunity in the workplace.

Suppliers shall:

1. Treat workers with respect and dignity. All forms of offensive behaviour, including insulting, violent, abusive, demeaning, harassing or bullying conduct towards workers, are prohibited;
2. Prohibit any threats, bullying or unlawful harassment of any type, including emotional, physical or sexual harassment of their employees and others with whom they interact;
3. Respect the diversity of the workforce and seek an environment where all individuals have equal opportunities and are treated with respect and dignity regardless of race, religion, gender, age, nationality, disability, personal relationship, union membership, sexual orientation, political opinion or any other personal characteristics. Employment shall be based upon individual merit and qualifications directly related to professional competence;
4. Prohibit the use of child labour. Employees shall not be under the age of 16 or any higher legal minimum working age of the respective region. TMC supports the development of legitimate workplace apprenticeship programs for the educational benefit of younger people and will not do business with those who abuse such systems; and
Ensure that children are protected from tourism-related sexual or other exploitation and abuse and shall without exception report any incidents or suspicions to the local authorities.



Working Conditions

To provide and promote fair working conditions, we expect Suppliers to employ and pay according to the following standards.

Suppliers shall:

1. Pay living wages under humane conditions. All workers shall be provided with clear, written information about their employment conditions with respect to wages before they enter employment and as needed throughout their term of employment. Wages and benefits paid for a standard working week must, at a minimum, meet national legal standards;
2. Not to apply deductions from wages unless allowed by national law and only to the extent allowed by law. In other cases, wages deductions shall only be permitted with the express permission of the worker concerned;
3. Use only voluntary labour and all workers must be free to leave upon reasonable notice. The use of (or in any way benefiting from) forced, prison, bonded or involuntary labour by a Supplier and/or its subcontractors is prohibited, and Suppliers must promptly inform the appropriate authorities where they reasonably suspect that any individuals associated with their businesses are at risk of human trafficking or similar exploitation;
4. Not require workers to work more than the maximum hours of daily labour set by local laws; and
5. Provide as a minimum all legally mandated benefits, holiday time, maternity/paternity and other leave periods, and holidays.



Health & Safety

TMC will only work with Suppliers who provide a safe and healthy working environment for all their employees

Suppliers shall:

1. Fully comply with all applicable health and safety laws, regulations and practices and will provide a safe and healthy working environment for all employees. Emergency response procedures will be established and maintained, as applicable;
2. Ensure that sufficiently high standards of hygiene and sanitation are maintained on their premises, implement work safety guidelines and procedures and educate their employees to reduce and prevent accidents and occupational illness and not discipline employees for raising safety concerns; and
3. Ensure insurance coverage and medical attention is provided to employees in case they suffer an accident or incident while working.



Responsible Business & Ethical Behaviours

Suppliers are expected to conduct business in a transparent and ethical manner and shall not participate directly or indirectly in any illegal, corrupt or improper business practices.

Suppliers shall:

1. Accurately and fully disclose to TMC any requested or relevant information regarding their business activities, structure, financial situation and performance which may affect the performance of their contract with TMC, in accordance with applicable laws, regulations and industry practices;
2. Comply with the anti-corruption laws of the countries in which they do business and with the United Kingdom Bribery Act;
3. Not offer, promise or pay, or request, receive or accept any bribes or other undue or improper advantages to or from anyone for any reason, whether in dealings with governments or the private sector;
4. Not engage in corruption, extortion, anti-competitive practices or fraud in any form;
5. Be direct and truthful in discussions with regulatory agency representatives and government officials and in all business dealings;



6. Immediately notify TMC if any TMC employee solicits any gift, benefit or favour regardless of value; Notify and seek permission from TMC in writing prior to offering any gifts or hospitality to any TMC employee of more than minimal value;
7. Ensure that any such gifts or hospitality are not intended to and could not reasonably be perceived to be an attempt to secure improper favourable treatment;
8. Be upfront and disclose any conflicts of interest with TMC including TMC employees;
9. Comply at all times with all sanctions, export control, and anti-boycott laws, regulations, orders, directives, designations, licenses, and decisions of the United Kingdom and of any other country with jurisdiction over activities undertaken in connection with their engagement of TMC;
10. Fully comply with any applicable money laundering regulations, prohibit money laundering and actively pursue its prevention; and
11. Not do or omit to do any act or thing which may cause TMC to commit a bribery, corruption, money laundering, anti-trust or fraud offence.



Data Protection & Information Security

Protecting and safeguarding the information TMC has been trusted with, is one of our most important matters.

Suppliers shall:

1. Respect the privacy of their candidates, employees, customers, suppliers, shareholders and other stakeholders;
2. Comply with all applicable data protection laws including the General Data Protection Regulation (EU) 2016/679 and train employees in this respect;
3. Implement appropriate security measures to protect personal data; and
4. Fully comply with any data processing agreement or terms entered by the parties.



Confidential Information

Suppliers shall respect and keep confidential (and cause their employees and suppliers also to respect and keep confidential) any confidential information disclosed by TMC during their commercial relationship. Such obligations will remain in place after the termination of the commercial relationship in accordance with the terms of the confidentiality agreement agreed between the parties.



Environmental Sustainability & Corporate Responsibility

Sustainable business travel is an important focus for TMC and its customers. We strive to operate sustainably, in order to minimize the environmental impact of our activities.

Suppliers shall, without limitation:

1. Fulfil all environmental requirements defined in relevant laws and regulations and environmental permits;
2. Seek to make continuous improvements to the environmental performance of its operations and products;
3. Contribute to the sustainability of the communities in which they operate, with progress assessments on community issues in line with industry standards;
4. Seek to reduce energy (in particular CO2 emissions) and water consumption;
5. Implement purchasing policies and procedures which favour sustainable and locally produced goods and services in preference to imported products wherever possible and reasonable; and
6. Monitor, control, treat and endeavour to reduce or eliminate solid waste, wastewater, environmentally damaging chemicals, and air emissions as required by applicable laws and regulations, including energy-related indirect air emissions, by: implementing appropriate conservation measures in their production, maintenance, and facilities procedures; and recycling, reusing, or substituting materials.

Tax

We believe that taxes are part of a well-ordered society. To that end, we expect our Suppliers to ensure and procure that they, their officers, employees, agents, subcontractors and any other persons who perform services for or on their behalf will:

1. Comply with all applicable tax legislation and meet legal requirements, including timely filing of tax returns and tax payments;
2. Maintain an open, transparent dialogue and a good working relationship with tax authorities both proactively and reactively;
3. Carefully monitor and analyse any risks to achieve the greatest possible level of transparency to ensure the right decisions are made in time to protect the business from any significant financial impact; and
4. Not do or omit to do any act or thing which may cause TMC to commit a tax offence.



Implementation & Controls

1. Provide systems and channels for employees or others to be able to report (also anonymously) any concerns or grievances connected with laws and regulations applicable to the Supplier and with this Code and do not discipline employees or any other party for raising such concerns; and
2. Ensure that it has in place adequate policies and procedures to ensure compliance with all applicable laws, regulations and this Code and to minimise the risk of breach.



Amendments

This Supplier Code of Conduct may be amended by TMC from time to time and TMC will inform Suppliers accordingly.

