

Supplier Code of Conduct

August 2025

Version 1.0

Dear Supplier,

Welcome to Grainger's Supplier Code of Conduct (Code). The Code acts as a guide to operating ethically and responsibly when acting on behalf of Grainger and should assist you with:

- Protecting the Grainger brand and upholding our values
- Acting in a way which is considered honest and ethical
- Understanding what Grainger expects of you
- Making good business decisions whilst representing Grainger; and
- Seeking guidance should you have any questions

Grainger has the right strategy and vision to thrive as the UK's leading landlord, however, each supplier is important to us to help us deliver the strategy. It is imperative that compliance with the Code is understood and undertaken both in letter and practice.

About Grainger Plc

Founded in Newcastle upon Tyne in 1912, Grainger plc, a FTSE 250 business, is the UK's largest listed residential landlord and leader in the fast-growing build-to-rent sector, providing c.11,100 rental homes to over 25,000 customers. With a pipeline of secured build-to-rent development projects totalling c.4,500 homes and £1.3bn, Grainger is creating thousands more rental homes by investing in cities across the UK.

Grainger works in partnership with a large number of public sector organisations to deliver new homes and create vibrant communities, including Transport for London, Network Rail, the Ministry of Defence, Lewisham Borough Council, Canal & River Trust and the Local Pensions Partnership.

Grainger's build-to-rent developments provide a range of customer benefits from professional on-site resident services teams, resident amenities including gyms, residents' lounges, roof terraces, meeting rooms and co-working space for those working from home, and superfast 250MB fibre optic broadband.

Recognised as a FTSE4Good business, Grainger also takes a leading approach to sustainability, specifically Environmental and Social issues (ESG) and has an ambitious target to be net zero carbon in the operations of its buildings by 2030, to have a diverse and inclusive workforce and to make a positive social impact in locations where it invests and operates.

The Code

This Code sets out the obligations on all third-party suppliers to Grainger, who are required to observe and uphold the highest standards of probity and conduct as set out in this Code. Except where otherwise indicated, this Code applies equally to all who are providing a service on behalf of Grainger. It is accepted that not all suppliers will be customer facing, but this Code is applicable to all suppliers, whether working directly with our customers or not. It is expected that all suppliers will read, acknowledge and comply with this Code.

Any queries relating to this Supplier Code of Conduct should be addressed to the Director of Procurement.

Defined Terms

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| Board Member | Includes all members of our board, committees and governing bodies |
| Contract | Work that is agreed to be undertaken by the Supplier on behalf of Grainger |
| Customer | Includes residents, tenants, leaseholders, and users of the services provided by Grainger |
| Employee | Includes Grainger's paid employees and any other person fulfilling the role of a paid employee, including agency workers or secondments |
| Grainger | Includes Grainger plc, Grainger Trust, and any other Grainger subsidiaries |
| Individuals | Employees of the Supplier |
| Senior Person | An Officer, Director, or Head of Service within Grainger |
| Stakeholder | All associated persons of Grainger |
| Supplier | Includes those other than Grainger board members, staff and involved residents and customers who are directly involved in delivering the activities of the business. Suppliers may also be referred to as Contractors, Sub-Contractors, Consultants, and other known Third-Party terms. |

Client Commitment

Grainger plc recognises that responsible sourcing is a shared commitment and is dedicated to fostering ethical, fair and sustainable business relationships with its suppliers. As part of this commitment, Grainger plc agrees to:

Fair business

- Engage with suppliers in a fair, transparent and ethical manner.
- Ensure that contracts, payment terms and agreements are clear and mutually beneficial.

Timely payment and financial fairness

- Honour agreed upon payment terms to support the financial stability of suppliers.
- Avoid unfair payment practices that may place undue burden on suppliers.

Compliance and support

- Adhere to all applicable laws and regulations regarding procurement and supplier management.
- Provide guidance and support to suppliers to help them meet compliance and sustainability goals.

Non-Discrimination and equal opportunity

- Treat all suppliers fairly, regardless of size, location or ownership.

Confidentiality and data protection

- Protect any confidential or proprietary information shared by suppliers.
- Ensure responsible handling of supplier data in compliance with relevant laws.

Environmental and social responsibility

- Encourage sustainable practices in the supply chain.
- Work with suppliers to minimise environmental impact and promote social responsibility.

Open communication and issue resolution

- Maintain open channels of communication to address concerns or disputes fairly and efficiently.
- Provide feedback and opportunities for suppliers to improve and grow their business.

Failure to uphold these commitments may impact the business relationship between Grainger plc and its suppliers.

Purpose

All suppliers must familiarise themselves with the contents of the Code and act in accordance with its principles and provisions at all times. All individuals employed by the supplier are responsible for reinforcing this Code with anybody working on the Contract, including with sub-contractors. Failure to comply with the Code may result in contract termination.

Supplier Commitment

General Responsibilities

Suppliers and individuals must always comply with all applicable laws, regulations, and standards in the countries in which they operate.

Grainger is committed to providing a safe, inclusive and respectful workplace, free from harassment and discrimination. As part of this commitment, Grainger requires suppliers in relation to all their dealing with Grainger to comply with the applicable UK legal obligations, including (but not limited to) the duty to prevent sexual harassment under the Equality Act 2010, and compliance with the Economic Crime and Corporate Transparency Act 2023.

Individuals must not bring Grainger's name into disrepute or affect its integrity by their words or actions, either within the organisation or outside. This includes the use of social media sites.

If any supplier wishes to post on social media, referencing work or a project undertaken which includes the Grainger brand, logo, images or project information, permission must be requested and obtained in writing prior to posting.

The supplier shall identify, correct, and report any breaches of this Code to the Director of Procurement, agreeing a schedule for remediation.

All suppliers undertaking construction work, as defined by CDM regulations, are required to hold a minimum of gold Constructionline and £5M public liability insurance. Note that the definition of 'construction' under the regulations is broad and includes but is not limited to maintenance, repairs, and alterations. Where suppliers are not undertaking construction work, a minimum of £5M public liability insurance is required. Membership of an SSIP scheme equivalent to Constructionline is acceptable for these suppliers, where required and relevant to the work being undertaken. All suppliers undertaking design, Principal Designer or construction works on Higher Risk Buildings (as defined by the Building Regulations and Higher Risk Buildings Regulations) will be required to provide evidence of their competence to perform these services and of their understanding of their duties as defined within the above legislation.

It is the responsibility of the supplier to ensure that their subcontractors meet the same minimum requirements above and those included within this Code. In addition, suppliers must have evidence of quality assurance audits of subcontractor activities and confirmation that the supplier has fulfilled their duties under CDM regulations, available to Grainger on request.

Funds and Resources

Any funds or resources provided by Grainger must not be abused. They must be used in a responsible and ethical manner, to avoid wastage, loss, or damage.

Confidentiality

Individuals must manage information in accordance with the law, and Grainger's policies and procedures.

Individuals must comply with the provisions of the UK GDPR regime, particularly the Data Protection Act 2018, governing the protection of personal data. No information should be

disclosed without appropriate authority. This continues to apply after the contract has expired. Non-Disclosure Agreements must be signed where requested.

Health, Safety and Security

Live.Safe is Grainger's health and safety programme intended to put health and safety at the heart of everything we do; it expects behaviours that reinforce and back up our safety culture. Suppliers shall provide a healthy and safe working environment for employees, individuals, contractors, or any other party working on the contract, including:

- Putting mechanisms in place to ensure health and safety obligations are communicated and applied appropriately.
- Meeting the general principles of health and safety risk prevention and management, using competent and trained individuals.
- Reporting incidents, accidents, and unsafe conditions at the earliest opportunity and assisting with subsequent investigations.
- In the event of a major emergency such as life-threatening injuries, flooding, fire, prolonged power loss – call **0845 112 5555 immediately** leaving your name and a brief description of the incident.

Individual's conduct must not endanger the health, safety or security of themselves or others. They must follow good health and safety practice, through identification of hazards and correct storage of equipment and materials, clearing debris and general safe working procedures.

Modern Slavery

The supplier is responsible for implementing and enforcing effective systems and controls to ensure that there is no modern slavery or human trafficking in any part of its supply chain. In particular, the supplier must ensure that there are no cases of:

Child Labour

The supplier shall prohibit child labour. In the event the supplier discovers a child is employed, the best interests of the child should be the primary consideration, alerting the appropriate authorities where necessary.

Forced Labour

The supplier shall not use any form of forced, bonded, or compulsory labour, slavery, or human trafficking. Individuals must be free to leave their employment, giving reasonable notice, and employment should be voluntary.

Working Hours

The supplier is responsible for ensuring that the number of hours worked by individuals does not exceed the maximum set by local law. Individuals have a right to paid vacation, and emergency leave as required.

Right to Work

The supplier must ensure that the appropriate “Right to Work” checks are completed on all individuals before employment commences.

Payment

Suppliers must ensure that all employees receive compensation and benefits that meet or exceed the minimum requirements stipulated by applicable local laws and regulations.

Suppliers will commit to paying suppliers on time and to payment terms.

Fair Treatment

The supplier will treat all individuals with respect and dignity and will not support any form of discrimination. The supplier will provide appropriate welfare facilities, leave policies, opportunities for learning and development, as is applicable to the role.

Grainger may on request undertake an audit of the labour and supply chain practices, to ensure prevention of slavery, human trafficking, discrimination and unethical practices.

Representing Grainger

In representing Grainger with customers, Board Members, Employees and outside bodies, individuals must be an ambassador for Grainger and uphold and promote its values, which are:

- Every home matters
- People at the heart
- Leading the way
- Exceeding expectations

Reporting Concerns**Wrongdoings**

Individuals must report to a Senior Person any reasonable and honest suspicion they have about wrongdoings.

Wrongdoings may include but will not be limited to fraudulent activity; breaches of this Code; breaches in legislation; being asked to do something that conflicts with this Code or any attempt to undertake or facilitate tax evasion.

Grainger operates an independent Whistleblowing facility which can be used if you are concerned about any form of possible malpractice.

Suppliers are encouraged to use the following mailbox to raise concerns in the first instance, suppliermanagement@graingerplc.co.uk.

If you do not feel comfortable reporting it in this way the matter should be raised through the independent ‘ethicspoint’ reporting line. The ‘ethicspoint’ line is available to you 24/7, 365 days a year and open to all employees and third parties who are contracted to Grainger. The service is provided by a completely independent company who you can contact in the following ways:

- Freephone 0800 89 0011 (then enter the Grainger specific code '833-373-0851')
- Online graingerplc.ethicspoint.com

Damp Mould and Condensation (DMC)

All suppliers must report to Grainger any DMC issues observed while carrying out repairs or inspections at rented properties. This includes but is not limited to:

- Structural or safety concerns (e.g. damp, mould, loose fittings)
- Non-compliant installations (e.g. electrical, gas, fire safety)
- Signs of neglect or deterioration not related to the original repair request

This policy supports our legal obligations under the Renters' Rights Bill and helps us proactively address issues that may affect tenant wellbeing or property standards.

Probity

Grainger will use reasonable endeavours to ensure that suppliers directly involved in delivering Grainger's business activities are obliged to comply with relevant policies, procedures, and codes of conduct.

Compliance with appropriate policies, procedures and codes of conduct will be reviewed on an annual basis, and suppliers will be expected to comply with our requests for information, whether requested verbally, in writing, or via any technology platform we use.

Individuals must take all reasonable steps to ensure that no undeclared conflict arises, or could be perceived to arise, between duties and personal interests, financial or otherwise.

Loyalty and Conflicts of Interest

All actual or potential conflicts of interest must be openly declared to the Director of Procurement and properly resolved.

Where a potential conflict has arisen, Grainger and the supplier must consider how to ensure that it has been dealt with to protect Grainger and its reputation; in certain circumstances, this may result in the termination of a contract.

Prevention of Bribery and Corruption

Suppliers must comply with the Bribery Act 2010. Grainger has a zero-tolerance approach to bribery or corruption in any form. Our approach to bribery prevention is detailed in our policy, available on request.

Individuals must not offer, seek, or accept bribes or inducements (to act improperly or corruptly).

Individuals must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might be seen to compromise their judgment or be deemed excessive, without legitimate purpose or place them under an obligation to those individuals or organisations.

Fraud and Money Laundering

Grainger has a zero-tolerance approach to the facilitation of tax evasion, which is detailed in our policy, and we expect all stakeholders of Grainger to act in accordance with this policy. We have a responsibility for tax evasion prevention and detection, where suspicions will be investigated. We have the right to terminate our relationship with any organisation working on our behalf if they breach this policy.

The Supplier must ensure that all laws on fraud and money laundering are complied with, to ensure early detection and compliance with appropriate anti-fraud and anti-money laundering programmes.

Sustainability

We have an embodied carbon target seeking to achieve a 40% reduction in upfront carbon against Grainger's baseline by 2030.

The Supplier shall ensure that sustainable products and materials are procured in the running of the contract and reasonable measures are adopted to reduce the environmental impacts caused by the management and delivery of the contract.

The Supplier is encouraged to offer Social Value in relation to the contract, particularly relating to supporting local initiatives in our communities.

Grainger may on request require provision of sustainability information from the Supplier, to include GHG emissions and social value data. Grainger may require suppliers to have appropriate environmental policies, procedures and certifications such as ISO 14001 in place for specific contracts.

Respect

Suppliers must adopt and promote standards in the workplace, on site, or in customers' homes, which demonstrate respect for all and promote the values of the organisation.

Respect for Others

- Individuals must always treat others with respect.
- Always complying with legislation.
- Individuals must comply with the law and Grainger's policies and procedures relating to Equality, Diversity, and Inclusion which confirms our commitment to ED&I. We actively promote and expect our suppliers to also promote dignity and respect in the workplace where individual differences and contribution of all colleagues are recognised; with a workplace that is free of bullying, harassment, victimisation and unlawful discrimination. Our policies align with The Equality Act 2010. Our ED&I policy can be found at: [2024 - Grainger plc - EDI Policy.pdf](#).
- Individuals' conduct at meetings must show respect for all and comply with Grainger's standards, including being mindful of vulnerable customers.

Respect for Customers

Suppliers must ensure that customers are respected by:

- Ensuring that individuals adopt a professional approach from first contact with customers to completion of the work, by introducing themselves, presenting photo ID, wearing an appropriate uniform and being clean and tidy in their appearance.
- Being polite and courteous.
- Engaging with the customer to allay concerns and respecting their personal circumstances.
- Understanding that some of our customers may be classed as vulnerable and adopting appropriate ways of working to support them.
- Ensuring customers are satisfied throughout the works.

Where concerns are identified with customers, whether adult or children, suppliers must report their concerns to Grainger (including Grainger Trust) and must adhere to relevant safeguarding policies.

Respect for Homes

Customers' homes must be respected by:

- Treating their homes as thoughtfully as their own, using dust sheets where required, and keeping the work area clean and tidy at the end of the day and when work is completed.
- Respecting the customer's home (inside and out) by not using their facilities, smoking, playing music, eating, using inappropriate language, using mobile phones, or other unacceptable behaviour.
- Being considerate to our customers and the environment when parking vehicles.
- Making use of our own staff facilities, provided for staff use and welfare.
- Working to standard hours and maintaining the security of our customers' homes.
- Reconnecting mains services, repositioning appliances and explaining how to use new installations upon completion.

Communication

Suppliers will ensure when communicating with our customers that they:

- Communicate in a friendly, clear, and concise manner.
- Keep customers informed of what, when and where they will need from our customers before and throughout any time in the customers' home.
- Update customers in a timely manner of any alterations in timescales/any changes to the plan agreed with customers e.g. when improvement or repair works need to be conducted differently or followed up or a date of an inspection changes.
- By listening to customers and acting as appropriate.
- Ensure that work has been completed to customer satisfaction, and to rectify or report/escalate outstanding issues promptly.
- Whilst adhering to Grainger's complaints procedure.

Policies and Procedures

Suppliers must have policies and procedures in place to enable them to address promptly and effectively any failure to meet appropriate standards. These must be provided to Grainger plc if requested.