	NAME	<u>Ethical Trading Policy</u>
	REF	PS-003-WB-UED
	ISSUE DATE	08/01/2025
	REVISION No	1
	PREPARE BY:	SM
	APPROVE	RM

Policy Statement

WestBank Businesses is committed to achieving the highest ethical and legal standards across group companies, supply chain.

WestBank Businesses upholds its principles of human rights, labour, environment, sustainability and anti-corruption.

The relationship between WestBank Businesses and suppliers and business partners is an important component of our commitment to trading ethically and sustainably. As part of this commitment, we seek to extend these standards across our supply chains.

This policy therefore applies to all WestBank Businesses suppliers, distributors, agents, and third-party providers. It sets out the minimum mandatory requirements for doing business with any company that is part of WestBank Businesses. We continue to work with our suppliers and business partners to not only to meet these minimum requirements but also continuously improve in line with industry best practice.

This Ethical Sourcing Policy covers

- Section A – Compliance
- Section B – Ethical and Environmental Standards

Section A: Compliance

All suppliers and business partners to WestBank Businesses are required:

1. Legal Compliance


o to comply with all applicable national and international laws and regulations including without limitation, regulations aiming to protect human rights, health, the environment, anti-trust, data protection, international trade compliance and workplace safety, and regulations aiming to combat corruption, money laundering, terrorism.

2. Anti-bribery and Corruption

To have in place adequate procedures to manage the risk of bribery and corruption in its business and supply chains

3. Anti-Competition

To comply with the WestBank Businesses Competition Policy, as if it applied to the supplier or to have equivalent principles in place through its own policies

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4. Conflicts of interest

To have policies in place to avoid conflicts of interest and provide a mechanism for employees to report potential conflicts of interest between them, or any relative, close friend or associates and WestBank Businesses

5. Modern Slavery and Child Labour

To comply with the WestBank Businesses Anti-Slavery and Child Labour Policy, as if it applied to the supplier or to have equivalent principles in place through its own policies

6. Human Rights

Not to discriminate on the grounds of gender, gender identity, sexual orientation, ethnic or national status, race, colour, religion, marital or civil partnership status, pregnancy, parental status, dependants, age, disability, social class, union membership, political views or educational background

7. Environment, Health and Safety

To provide a safe and healthy working environment for all employees including providing free of charge appropriate personal protective equipment where applicable

To have policies and procedures in place to prevent accidents and injury when undertaking duties related to suppliers business

8. Taxation and Fraud

Not to engage in or facilitate any form of tax evasion

9. Supply Chain

To take all reasonable steps to ensure the principles of this Ethical Sourcing Policy are adhered to by its own suppliers and third parties

10. Conflict Minerals


To make all reasonable efforts to avoid the use of materials which either directly or indirectly finance armed groups or others who violate human rights

To provide on request the conflict mineral status of any products supplied using the Responsible Minerals Initiative's Conflict Minerals Reporting Template

Section B: Ethical and Environmental Standards

1. Sustainability

WestBank Businesses is committed to enhancing the sustainability of its business and encourages all suppliers and business partners to strive to:

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- Conserve energy and natural resources, preventing pollution and environmental incidents and promoting sustainable transportation, production and consumption
- Reduce scope 1,2 and 3 Green House Gas emissions
- Reduce total waste and waste intensity, increase recycling, minimise landfill and to offer product end-of life take-back and recycling options where appropriate

2. Whistleblowing 'Speak Up'

We are committed to an open and accountable culture where employees and others can express concerns in the knowledge they will be taken seriously and treated fairly without retaliation. Our Speak Up policy and facility encourage reporting of concerns about an illegal act.

Andrew Reeks
Operations Director

08/01/2025

Signature

