



Route101

SUPPLIER CODE OF CONDUCT

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INTRODUCTION

Route 101 Limited ("**Route 101**", "**We**", "**Us**") is committed to conducting business ethically and responsibly, promoting sustainable development and fostering a culture of social responsibility, while safeguarding the integrity and security of its operations.

We expect our suppliers to share these values and adhere to the principles and requirements outlined in this Supplier Code of Conduct ("**Code**"). This Code establishes the minimum standards and behaviours we expect from all suppliers, their employees/workers, consultants, subcontractors, and agents who supply goods or services to us. We expect our suppliers to cascade and promote these requirements throughout their own supply chains to help us drive positive environmental and social outcomes across supply chains.

We reserve the right to refuse and/or to review our commercial relationship with the supplier (the "**Supplier**", "**you**") should this Code not be respected or not be materially aligned with, in accordance with the Compliance Certificate found on page 9.

OVERVIEW OF THE CODE

1. Legal Compliance
2. Business Integrity and Ethics
3. Labour and Human Rights
4. Health and Safety
5. Diversity and Inclusion
6. Environmental Responsibility
7. Data Protection, Information Security and Confidentiality
8. Quality and Products Standards
9. Artificial Intelligence (AI)
10. Supply Chain Management
11. Compliance, Monitoring and Reporting Breaches

LEGAL COMPLIANCE

The Supplier must comply with all applicable laws, regulations, and industry standards, including but not limited to the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work (ILO), the OECD Due Diligence Guidance for Responsible Business Conduct, the Ten Principles of the UN Global Compact (UNGC), the UN Guiding Principles on Business and Human Rights (UN GPs), the Modern Slavery Act 2015, the Equality Act 2010, the Health and Safety at Work Act 1974, the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025, the Bribery Act 2010, Criminal Finances Act 2017, Climate Change Act 2008, Environment Act 2021 and Waste Regulations.

Where work relates to UK public sector clients, the Supplier must align with the HM Government Supplier Code of Conduct expectations the UK Government’s Greening Government Commitments (GGCs), the GOV.UK Technology Code of Practice.

BUSINESS INTEGRITY AND ETHICS

Route 101 is committed to ensure the highest standards of integrity and ethical conduct in its activities and business relationships, including its supply chain. Route 101 expects the Supplier to equally commit to:

INTEGRITY AND TRANSPARENCY

Conduct business honestly, avoiding conflicts of interest, fraud, or misrepresentation. Accurate records of all transactions must be maintained.

ANTI- CORRUPTION AND BRIBERY

The Supplier must not engage in bribery, kickbacks, corruption or improper payments to influence business decisions or unethical financial practices.

FAIR COMPETITION	The Supplier must comply with UK competition laws and avoid anti-competitive practices, such as price-fixing or market manipulation.
WHISTLEBLOWING	The Supplier must maintain safe channels for reporting misconduct, including suspected modern slavery, labour exploitation and unethical practices, without retaliation.
OVERSIGHT AND REVIEW	The Supplier must maintain safe channels for reporting misconduct, including suspected modern slavery, labour exploitation and unethical practices, without retaliation.
REPORTING CHANNELS	The Supplier shall ensure workers have access to multiple channels through which concerns can be raised, including line management, HR representatives, worker representatives or trade unions (where applicable), and anonymous reporting mechanisms where appropriate.
CONFLICTS OF INTEREST	Avoid conflicts that could negatively impact Route 101 or its clients.

LABOUR AND HUMAN RIGHTS

Route 101 supports the protection of human rights around the world and is guided by fundamental principles such as those in the United Nations Universal Declaration of Human Rights and the International Labour Organisation (ILO) Core Conventions.

SLAVERY, HUMAN TRAFFICKING AND CHILD LABOUR	The Supplier must not use forced, bonded or child labour. The Supplier shall not engage in human trafficking, or modern slavery in any parts of its supply chain. Workers must be of legal working age as defined by UK law or the laws of the country of operation, whichever is stricter.
FAIR TREATMENT	The Supplier shall treat all workers with dignity and respect, prohibiting harassment, abuse, or discrimination based on race, gender, religion, age, disability, sexual orientation, or any other protected characteristic.
FAIR WAGES AND WORKING HOURS	The Supplier must comply with applicable wage laws, including minimum wage, overtime pay, and benefits. Working hours must adhere to legal limits and ensure reasonable rest periods.
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING	The Supplier must respect workers' rights to join or form trade unions and engage in collective bargaining, in accordance with local laws.

**RESPONSIBLE
SOURCING OF
RAW MATERIALS**

The Supplier must Implement due diligence systems to monitor human rights and environmental risks in raw material supply chains.

**ACCESSIBLE
REPORTING**

The Supplier must ensure that workers, including migrant and temporary workers where applicable, can access information regarding their employment rights and grievance mechanisms in a format and language they can reasonably understand.

HEALTH AND SAFETY

The Supplier shall provide a safe, healthy and sanitary working environment, including but not limited to:

- Compliance with occupational health and safety regulations.
- Providing appropriate training, equipment, and protective measures to prevent workplace hazards and work-related accidents and injuries.
- Maintaining clean and hygienic facilities.
- Implementing emergency preparedness plans, including fire safety and evacuation procedures.

DIVERSITY AND INCLUSION

Route 101 is an equal opportunities employer, complies with all equality legislation and promotes diversity and inclusion throughout the company. Route 101 does not tolerate bias, discrimination, intimidation or any form of harassment in the workplace, including sexual harassment. We expect our suppliers to share and support us in this commitment to diversity and inclusion, and ask our suppliers to commit to the following in their relationship with us and also within their own organisations and supply chains:

- Avoidance of discrimination under the Equalities Act 2010.
- Promote a workplace free from any form of harassment, victimisation or any other form of inappropriate behaviour or abuse on any grounds.
- Where possible, work with diverse businesses and ensure inclusive sourcing decisions.

ENVIRONMENTAL RESPONSIBILITY

Route 101 has committed to achieving net zero by 2050 at the latest. The Supplier must operate in an environmentally responsible manner and comply with UK environmental laws, including:

**REDUCING NEGATIVE
ENVIRONMENTAL
IMPACTS**

Take action to reduce operational environmental impacts including minimising waste, water use and emissions.

EMISSIONS REPORTING	The Supplier shall measure and report Scope 1 and Scope 2 GHG emissions as a minimum requirement. Relevant Scope 3 emissions shall also be reported as far as reasonably possible. All reporting shall follow internationally recognised standards such as the GHG Protocol.
NET ZERO TARGET	Implement a Carbon Reduction strategy in line with the UK Government commitment to achieve net zero by 2050; consider validation via the Science Based Targets initiative (SBTi).
RESPONSIBLE SOURCING AND DEFORESTATION-FREE PRODUCTS	Using materials and resources that are sustainably sourced and, where possible, certified by recognised standards (e.g. FSC for timber or Fairtrade for agricultural products).
POLLUTION PREVENTION	Preventing pollution and managing hazardous materials safely.
COMPLIANCE WITH PERMITS	Obtaining and adhering to all necessary environmental permits and reporting requirements.
14001 ACCREDITATIONS OR EQUIVALENT	The Supplier must have an Environment Management System (EMS) aligned with ISO 14001 or equivalent.
CIRCULAR ECONOMY	Design out waste, prioritise reuse and repair, and manage end-of-life responsibly.

DATA PROTECTION, INFORMATION SECURITY AND CONFIDENTIALITY

The Supplier must comply with all data protection and information security requirements, including:

CONFIDENTIAL INFORMATION	The Supplier must protect all confidential information provided by Route 101, including trade secrets, business plans, and customer data. This obligation applies to all forms of data (electronic, paper, verbal) and to all processing activities (storage, transmission, disposal).
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DATA PROTECTION COMPLIANCE AND CYBERSECURITY	The Supplier must comply with all data protection laws and requirements when processing personal data and implement appropriate cybersecurity measures to prevent data breaches.
SECURITY CONTROLS	The Supplier must implement proportionate technical and organisational measures and, where feasible, align with recognised standards such as ISO/IEC 27001 and/or equivalent. The Supplier must ensure they also apply this to their own suppliers and subcontractors. The Supplier shall have in place appropriate measures to: • Protect the integrity and confidentiality of information (including information belonging to or supplied by Route 101 held on its systems (which include physical and online electronic systems); and • Ensure that there is no unauthorised access of the information by third parties, including its Representatives. Recommended controls include: • Implementation of a risk-based approach to cyber security that includes the identification and classification of assets, assessment of their criticality, and management of risks throughout their lifecycle; • Access control and identity management to control who and what can access systems and data through enforcement of least privilege and strong authentication; • Encryption of data in transit and at rest; • Secure disposal of media and documents; • Regular security testing and vulnerability assessments; • Timely application of security patches to devices, servers and infrastructure to maintain protection against known threats; • Logging and monitoring controls designed to detect, investigate and respond to security events; • A documented and tested cyber incident response plan; • Implementation of a security awareness program to ensure staff are trained on and are aware of their information security obligations.
CERTIFICATION EVIDENCE	Where feasible, the supplier should provide evidence of ISO/IEC 27001 certification or equivalent controls, especially if handling sensitive or large volumes of Route 101 data.
INCIDENT NOTIFICATION	The Supplier should notify Route 101 without undue delay and within 48 hours of becoming aware of any cyber incident affecting Route 101 data or services. The Supplier must provide details of the breach, mitigation steps, and ongoing updates until resolution.

QUALITY AND PRODUCT STANDARDS

- The Supplier must deliver goods and services that meet agreed-upon specifications, quality standards, and delivery timelines.
- The Supplier must ensure products comply with relevant UK safety and quality regulations, such as the Consumer Protection Act 1987 and applicable product safety standards.

ARTIFICIAL INTELLIGENCE (AI)

The Supplier shall give Route 101 as much advance notice as possible if it proposes to use an artificial intelligence (AI) system to provide goods or services to Route 101. This applies to the Supplier's use of AI systems to directly provide goods services, and not to use of AI systems as part of the Supplier's internal management.

The Supplier Shall implement and adhere to responsible and ethical practices when designing, implementing, monitoring, training, testing, deploying, or otherwise developing or using AI systems. This includes adhering to all applicable:

- Laws and regulations;
- Industry requirements and standards;
- Guidance and codes of practice issued by a relevant regulatory authority; and
- Route 101's policies on AI, Ethics and privacy.

The Supplier must not use or retain Route 101's data or confidential information for the purpose of training or inputting into any AI system or model without prior written approval of Route 101.

SUPPLY CHAIN MANAGEMENT

COMPLIANCE	The Supplier must ensure their subcontractors and lower-tier suppliers comply with this Code or equivalent standards.
CYBERSECURITY RISK MANAGEMENT	The Supplier must assess and manage cybersecurity risks within their supply chain, including risks arising from subcontractors' access to Route 101 systems, data, or services.
DUE DILIGENCE	The Supplier must conduct due diligence to identify and mitigate risks related to modern slavery, security posture, unethical practices, or environmental harm in their supply chains. Due diligence should include security posture assessments and require evidence of controls where suppliers or their subcontractors process Route 101 data or connect to Route 101 systems.

INCIDENT DISCLOSURE

The Supplier must promptly disclose any significant security incidents or breaches within their supply chain that could impact Route 101's operations, data integrity, or service continuity.

COMPLIANCE, MONITORING AND REPORTING BREACHES

The Supplier shall provide written confirmation to Route 101 at least once per year that: (i) it has appropriate systems in place to **monitor** its compliance with this Code; and (ii) it is able to comply with this Code for the duration of its relationship with Route 101.

- **Audits and Assessments:** Route 101 reserves the right to conduct audits or assessments to verify compliance with this Code. The Supplier must provide reasonable access to facilities, records, and personnel for this purpose. This right also extends to auditing the supplier's data protection and security practices.
- **Reporting Violations:** The Supplier must promptly report any known or suspected violations of this Code to Route 101 via nc@route101.com.
- **Communication:** The Supplier shall communicate this Code to its workers to ensure that they are aware of the requirements of this Code and, where necessary, implement a system of training. The Supplier shall keep a record of the communication or training, available upon Route 101's request.

CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with or materially align with the principles of this Code may result in corrective action, including:

- Request for immediate remediation or require the Supplier to produce a remediation plan specifying the actions that the Supplier will take that will lead to compliance with this Code and present it to Route 101 within 7 working days of being requested to do so. If the Supplier fails to produce the remediation plan within this timeframe or fails to implement it within a reasonable time, Route 101 may immediately terminate its business relationship with the Supplier (including any contracts). Route 101 may in its absolute discretion provide the Supplier with support and resources to assist with remediation. Route 101 may also suspend the business relationship with the Supplier while remediation is ongoing.
- Suspension or termination of the supplier/business relationship (including any contracts) and the award of any future contracts.

CONTINUOUS IMPROVEMENT

The Supplier is encouraged to continuously improve its practices in line with evolving ethical, social, and environmental standards. Route 101 may collaborate with suppliers to support improvements and share best practices.

GOVERNANCE AND REVIEW

For questions or to report concerns related to this Code, please contact: compliance@route101.com. This Code is reviewed at least annually by the Compliance team and is also published on Route 101's website.

APPROVAL

This Supplier Code of Conduct is approved by Route 101's Chief Operating Officer.

DOCUMENT CONTROL

DATE	VERSION	CREATED BY	APPROVED BY	DESCRIPTION OF CHANGE
12/2025	1	AFD	KD	Initial release.
13/10/2026	1.1	BN/VT/AFD/FB	KD	Review and content amendments, formatting.