IEH Consulting Limited Code of Conduct

1. Principles

IEH Consulting Ltd. will operate in accordance with the principles of:

- Human Rights and Labour Rights
- Health, Safety, Quality and Environmental matters
- Diversity & Inclusion
- Anti-Corruption and Bribery
- Data Protection & Management Systems

We expect all our suppliers to equally respect these principles, as detailed below.

2. Code of Conduct

2.1 Human Rights

We will support, respect and comply fully with all applicable laws and local human rights standards as well as ensuring they are not complicit in human rights abuses.

2.1.1 Non-discrimination

All our Directors and Associates will have equal opportunities regardless of gender, race, religion, age, sexual orientation, disability, nationality, political views and social or ethnic background. All will be treated with respect and not be discriminated against in any way or intimidated either verbally, physically or mentally. The same shall apply to the employees of our suppliers.

2.1.2 Working hours and remuneration

We and our suppliers shall fully comply with all applicable laws, regulations and industry standards on working hours and pay. Workers shall be paid according to applicable wage laws, including minimum wages, overtime hours and associated benefits. Suppliers will provide workers with breaks, time off and sickness allowance in accordance with local laws.

2.1.3 Forced labour

IEH Consulting Ltd. will not tolerate any form of forced labour. Suppliers must not engage in or support any forms of compulsory or bonded labour. Suppliers must not require any form of deposit from its workforce and must ensure all forms of identification e.g. passport, driving licence etc. remain in the possession of its employees.

2.1.4 Child labour

Suppliers shall not use child labour or be complicit in its use throughout its own suppliers. Suppliers must ensure that all employees meet the minimum legal age for employment for all their operations irrespective of location. Suppliers are expected to inform the relevant authorities and IEH Consulting Ltd. immediately on finding any evidence of child labour either in its own operations or that of its suppliers.

2.1.5 Right to Work Documentation

Suppliers must check employees and prospective employees have the right to work in any country that the supplier provides goods and services. Suppliers should keep copies of all
associated documentation provided by the employee and ensure it is genuine, unchanged from the original and that the employee has permission to undertake the work being offered.

2.2 Anti-Corruption

Suppliers shall comply with all applicable laws and regulations and industry standards related to anti-corruption. Suppliers shall not bribe or attempt to bribe any public official, private person, representative of IEH Consulting Ltd. or any party acting on behalf of IEH Consulting Ltd. Suppliers must not use illegal payments, bribes, kickbacks, grease payments or other inducements to influence any business transaction.

2.3 Health & Safety

2.3.1 Health & Safety in the Workplace

The workplace, irrespective of the employees’ role and place of work e.g. office-based, site etc. will be a safe and healthy place of work and in accordance with all applicable laws or local standards. Suppliers must never compromise the safety of its own workforce, IEH Consulting Ltd. representatives, third parties or the wider general public. Appropriate health and safety training, information and ongoing support must be made available to all employees.

2.3.2 Hazards

Suppliers shall have suitable systems in place for providing workers and any associated contractors with safety information relating to hazardous materials. This should include providing training and protecting employees from potential hazards including, but not limited to, raw materials, products, solvents, cleaning agents and waste products.

2.3.3 Emergencies

Suppliers must have in place suitable emergency plans across their operations to minimize the potential impact of any emergency either as a result of its own operations or that of anyone working on their behalf.

2.4 Environment

Suppliers will comply with all applicable environmental laws and regulations and have in place the correct licences, permits, registrations and restrictions for their operations including, but not limited to:

— Ensuring the safe storage, handling, recycling or management of waste
— Managing any spillages/releases in accordance with guidelines applicable to the product and all practical measures taken to minimise the impact on the environment

In addition, IEH Consulting Ltd. and their suppliers will:

— Identify all potential environmental impacts and opportunities from their activities and seek to address and reduce these through appropriate planning and/or mitigation measures
— Seek to minimise pollution and use natural resources sustainably by considering environmental performance, energy use and climate change in all investment decisions, planning, development and management activities
— Ensure regulatory compliance and continuous improvement by identifying appropriate environmental standards, developing and implementing guidelines, implementing pollution mitigation measures, monitoring environmental performance, and reviewing activities where necessary
— Provide environmental training and awareness to staff to enable them to carry out their jobs responsibly, and ensure accountability for environmental performance

IEH Consulting Ltd. will inform and engage with our staff, development partners, regulators and communities and ensure that our contractors, suppliers and partners meet or exceed our environmental expectations.

2.5 Ethical Procurement

IEH Consulting Ltd. expects the activities of its suppliers to be based on sound business values, demonstrating an open, ethical and fair approach with its suppliers. Suppliers are expected to conduct their business in a fair, consistent, open and honest manner.

2.6 Sustainability

Suppliers must take all reasonable measures to ensure that its activities are undertaken in a manner consistent with IEH Consulting Ltd’s commitment to sustainable procurement. We expect all our suppliers to conduct their operations in a sustainable manner.

2.7 Data Privacy and Information Protection

IEH Consulting Ltd has an established policy on data privacy and information protection. Suppliers shall similarly maintain adequate protection of personal data and information for their operations, any third parties acting on their behalf and IEH Consulting Ltd. in accordance with the principles of The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679).

2.7.1 Protection of Personal Information and Business Information

Personal and business information is held by IEH Consulting Ltd. solely in password protected devices. This includes photographs, CVs and all client data. Specific confidentiality agreements are set up with partners and clients as required. Suppliers will be consistent throughout their operations and be compliant with applicable data protection/privacy laws for all information, including personal information. Proper organisational structure, processes and procedures to ensure the protection, confidentiality, integrity and availability of information against accidental, unauthorised or unlawful loss, destruction, alteration, disclosure or use should be in place. This may include high level policies, procedures, guidance and training to cover security whilst taking reasonable steps to stay current. In all cases, suppliers must notify IEH Consulting Ltd. immediately regarding any actual or suspected data breach. This will also include measures being taken by the suppliers, mitigations and outcomes to minimise the effect of the breach and likelihood of a reoccurrence.