



## SUPPLY CHAIN GUIDELINES

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# SUPPLY CHAIN GUIDELINES

## ACACIA TRAINING

### 1.0 PURPOSE & SCOPE

Acacia Training look to develop relationships with suppliers that share similar values to us and conduct business in an ethical manner.

We strive to treat our suppliers in the same manner we expect to be treated.

Acacia takes responsibility to ensure that its business operations do not contribute directly or indirectly to human rights abuses.

We use our influence internally to ensure that companies within the group and their employees fully understand the company's commitment to human rights and their own rights and responsibilities.

Acacia Training are committed to a consistent set of values that represent the highest standards of quality, integrity and excellence across all the countries within where they operate.

Acacia Training respect individual liberty, the laws, the unique customs, cultures and values within communities where our businesses operate.

### RATIONALE

As part of our wider ESG strategy, these guidelines are to assist Acacia in our efforts to develop and strengthen our relationships with suppliers. Acacia Training believe that good corporate citizenship is essential to our long-term business success and must be reflected in our relationships and actions in the marketplace, the workplace, the environment and the community.

<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

# SUPPLY CHAIN GUIDELINES

## ACACIA TRAINING

### 2.0 SUPPLIER PRINCIPLES

Acacia Training support fair employment practices consistent with our commitment to human rights in our workplaces.

All our suppliers are expected to follow applicable laws, and similar standards and principles in the countries in which they operate.

We expect our suppliers to judge their employees and contractors based upon their ability to do their jobs and not upon their physical and/or personal characteristics or beliefs, affirming the principle of no discrimination based on age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, political opinion, national origin or sexual orientation.

Acacia expect our suppliers to provide a safe workplace with policies and practices in place to minimise the risk of accidents, injury, and exposure to health risks.

We expect our suppliers neither to employ anyone under the legal working age nor to condone physical or other unlawful abuse or harassment, in any of their operations.

We expect our suppliers not to hold any person in slavery or servitude and not to use forced, bonded or compulsory labour, modern slavery or engage in any form of human trafficking.

We expect our suppliers to compensate their employees fairly and competitively relative to their industry, in full compliance with applicable local and national wage and hour laws, and to offer opportunities for employees to develop their skills and capabilities.

In the event their employees have lawfully chosen to be represented by third parties, we expect our suppliers to recognise such parties in good faith and not to retaliate against employees for their lawful participation in labour organisation activities.

We expect our suppliers to conduct business in ways that protect and preserve the environment. At a minimum, we expect our suppliers to meet applicable environmental laws, rules and regulations in their operations in the countries in which they do business.

The employees and LLP members in our businesses should have no relationship, financial or otherwise, with any supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of the company. Any such conflict should be disclosed to the company.



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The companies in the group hold their own anti-bribery policies (including gifts, meals and entertainment) and suppliers are expected to respect and adhere to these. Likewise, companies in MBH are expected to adhere to respective policies in supplier's companies.

Suppliers acting on behalf of companies must comply with all applicable anti-bribery and anti-corruption laws dealing with bribery of public officials or private parties. The supplier must not transfer anything of value, directly or indirectly, to any public official, employee of a government-controlled company, or political party, in order to obtain any improper benefit or advantage and should seek permission from the relevant company to approach any of the above if doing so on behalf of Acacia Training.

Suppliers should comply with applicable Data Protection laws.

Suppliers who believe that an employee/LLP member, or anyone acting on behalf of any company in MBH, has engaged in illegal or otherwise improper conduct, they should report the matter to the company.

Acacia Training encourages our suppliers, to freely raise any issues of compliance or ethical concerns you come across in any of our company's and feel confident that your concerns will be taken seriously and handled appropriately.

### 3.0 MINIMUM REQUIREMENTS

Whilst we expect suppliers to go above and beyond in areas to support our own ESG strategy and ethics, as a minimum Acacia Training expects:

- 1) **Laws and Regulations:** Supplier will comply with all applicable laws, rules, regulations and requirements in relation to any product or service.
- 2) **Child Labour:** Supplier will not use child labour as defined by local law.
- 3) **Modern Slavery, Forced Labour and Human Trafficking:** Supplier will not hold any person in slavery or servitude and will not use forced, bonded or compulsory labour or engage in any form of human trafficking. Supplier will not impose to workers any fees to secure their employment or placement, or to compensate any cost whatsoever Supplier incurred in the recruitment process.
- 4) **Abuse of Labour:** Supplier will not abuse labour, physically or otherwise.
- 5) **Third Parties:** Supplier will respect employees' rights to choose whether to be represented by third parties and to bargain collectively in accordance with applicable laws.
- 6) **Wages and Benefits:** Wages and benefits will comply with applicable laws.
- 7) **Working Hours & Overtime:** Working hours and overtime will comply with applicable laws.

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8) Health and Safety: Working conditions will comply with applicable laws.

9) Environment: Supplier will comply with applicable environmental laws.

Conflicts of Interest: suppliers should avoid situations where a conflict of interest may occur.

10) Business and Financial Records: Supplier will comply with all applicable laws concerning financial recordkeeping and reporting.

11) Bribery: Supplier will comply with all applicable anti-bribery laws and will not use bribes or fraudulent practices.

12) Protecting Information and Personal Data: Supplier will comply with applicable Data Protection laws including EU GDPR and not use data provided by any company in the group without prior consent.

**Acacia Training will cease activity with any supplier found to be not meeting the minimum requirements.**

## 5.0 REVIEW

These guidelines will be reviewed as a minimum on an annual basis and are subject to review at any point in line with changes to legislation.

## 4.0 GUIDELINES OWNER

CEO Victoria Sylvester is the Board representative with regards to ESG and therefore is responsible for these guidelines.