

NEXT15

Next 15 Group plc The Supplier Code of Conduct (Code)

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Approved by: Jonathan Peachey, Chief Operating Officer

Version: 1

Applies to: Next 15 Group

Introduction

Next 15 Group plc and its subsidiaries* (Next 15 or the Group) are committed to running a sustainable, equitable and diverse organisation that displays leadership in governance and values. The Group has placed business ethics at the forefront of its business practices, and to that end is committed to acting ethically and with integrity in all business dealings and relationships.

Our Suppliers (any entity, individual or partnership that supplies products or services to the Group) play an important role in our business, and therefore our values, which is why we expect them to reflect our three core principles embedded in the code. These principles set out the minimum standards that must be met by any Supplier who works with Next 15. In return, we strive to be a fair and honest partner, firmly believing that relationships built on trust and integrity are most sustainable and mutually beneficial to all.

About the Code

All Suppliers (including their workers and own supply chain) must comply with the Code. As such, Suppliers shall also be responsible for their own employees' and Suppliers' acts or omissions, including non-adherence to the Code. Failure to adhere or comply with the Code may result in the termination of a Supplier relationship.

Next 15 has the right to vary the Code from time to time. If there is a conflict between the provisions of an agreement with the Group and the provisions of the Code, the Supplier shall meet the higher standard.

New Supplier Form

As part of Next 15's commitment to continuous improvement with respect to our social and environmental principles, we ask that Suppliers demonstrate compliance with the Code by completing our New Supplier Form.

We may require Suppliers to re-perform this at certain intervals where necessary. This will ensure we monitor and report on our own progress over time. All Suppliers must provide information in a complete and timely manner and work with the Group to resolve any issues.

Our Next 15 Principles

Principle 1: a safe, responsible and ethical workplace for everyone

Our people are our most important asset which is why we go to the lengths that we do to protect them and ensure they are working in an environment that is safe and ethical. As such, Next 15 have Group policies on Anti-Corruption and Bribery (regardless of the territory of residence) and Information Security, Information Governance and GDPR.

Engagement with all Suppliers is governed by the UK Bribery Act 2021. All of our Suppliers must disclose to us any situation that could constitute a conflict of interest; and to refrain from using other people's intellectual property without their permission. We also ask that all of our Suppliers adhere to the following:

A) Compliance with law

Comply with all applicable local laws and regulations, including those related to issues addressed in this Code.

B) Data Protection and Information security

Comply with all applicable data protection laws (including UK GDPR, GDPR and the CCPA) and have in place appropriate measures to (a) protect the confidentiality, integrity and availability of the Group's (and its stakeholders') information held on its systems and assets and (b) ensure that there is no unauthorised access to such systems or assets.

C) Bribery and Corruption

Comply with all applicable laws relating to anti-bribery and corruption and, to that end, will not accept, offer, pay or authorise any unlawful or improper payments or benefits.

Principle 2: ensure everyone is treated with dignity and respect

We believe in a culture of inclusivity without categories or constraints, we celebrate difference and believe that diversity makes our business more relevant, our work more meaningful and our people more empowered. As such, Next 15 have Group policies on Modern Slavery, Health & Safety, Equal Opportunities and Anti-Bullying and Harassment.

We ask that all of our Suppliers must adhere to the following:

D) Workforce and equal opportunities requirements

- Comply with all applicable anti-slavery, human trafficking and child labour legislation. This includes, but is not limited to, not supporting or engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour and prison labour;
- Comply with all internationally recognised human rights legislation;
- Not discriminate in hiring, compensation or any other employment practice based on race, gender, gender identity, religion, age, sexual orientation or any other characteristic other than the worker's ability to perform the job and have policies in place to prevent any victimisation or harassment in respect of the same;
- Provide a safe, healthy and sanitary working environment in compliance with all applicable health and safety laws; and
- Compensate all workers with the applicable living wage, which includes with respect to workers

Principle 3: take ownership of our environmental impact

We hope that our alignment with the Science Based Target Initiative's emissions reduction trajectory, and our Group Environment Policy demonstrates our own commitment to Climate Change and the environment.

We ask that all of our Suppliers must adhere to the following:

(E) Environmental Responsibility

Comply with all applicable environmental laws and standards with respect to its business and have in place processes to assess its environmental impact and to continuously improve environmental performance.

Our Best Practices

In addition to our mandatory requirements set out in the Code, Next 15 is committed to going further with its continuous improvement with respect to our approach to social and environmental principles, including alignment with the B Corp framework. Whilst this is not the case at the moment, over time, preference may therefore be given to those Suppliers who achieve some or all of the following practices:

- Majority owned by women or individuals from under-represented populations
- Independently owned (majority owned by individuals as opposed to corporations)
- Are located within 50 miles of the Next 15 facility that is procuring the product or service
- Have achieved the B Corp certification (<https://bcorporation.net/>)

We look forward to working with you and thank you for helping us in our mission to support a sustainable and ethical future for everyone.

Jonathan Peachey

Chief Operating Officer

*Activate; Agent3; Archetype; Bynd; The Blueshirt Group; Brandwidth; Conversion Rate Experts; Elvis; Encore; House337; M Booth; M Booth Health, Mach49; MHP Mischief; Mighty Social; Nectar; Outcast; Palladium; Planning-inc; Publitek; Savanta; Shopper Media Group (SMG); Transform; Twogether, Velocity