

# FreeClix Ltd. Supplier Code of Conduct v1.0

Oct 16, 2026 · @FreeClix

## Purpose and scope

This Code sets the minimum standards FreeClix Ltd. expects from every supplier, contractor, agent and other third party that provides goods or services to us or on our behalf. It supports our Anti-slavery and Human Trafficking Policy and our commitment to acting ethically and with integrity in all our business dealings.

By supplying to FreeClix you agree to follow this Code. You are expected to meet the standards below, to go beyond them where local law or good practice requires, and, where the law sets a higher standard, to follow the law. Where the law is less demanding than this Code, you must still meet the Code.

Where we refer to "you", we mean the supplier and its directors, employees, workers, agents and subcontractors.

## Labour and human rights

You must treat every worker with dignity and respect, and you must not use or benefit from modern slavery or human trafficking in any form. In particular:

- **No forced or compulsory labour.** All work must be voluntary. You must not use bonded, indentured, prison or trafficked labour, or any work obtained by threat, coercion or deception.
- **Freedom of movement.** You must not hold workers' passports, identity documents or work permits, and must not restrict their freedom to leave the workplace or their employment, within the terms of their contract and the law.
- **No recruitment fees.** Workers must not be charged fees or costs to obtain or keep a job, directly or through an agent. If any are found to have been charged, you must repay them.
- **No child labour.** You must not employ anyone below the legal minimum working age, or under 15 where there is no local minimum. Young workers under 18 must not do work likely to harm their health, safety or education.
- **Fair pay.** You must pay at least the legal minimum wage that applies, including the National Minimum Wage or National Living Wage in the UK, pay on time, and provide clear pay information. Deductions must be lawful and agreed.
- **Working hours.** Hours must comply with applicable law, and workers must receive the rest breaks, rest days and leave they are entitled to.
- **Written terms.** Workers must be given clear terms of employment in a language they understand before they start.
- **Fair treatment.** You must not tolerate harassment, abuse, violence or discrimination, whether on grounds of race, sex, disability, religion, age, sexual orientation or any other protected characteristic.
- **Freedom of association.** You must respect workers' lawful rights to join, or not join, a trade union or other worker representative body.

## **Health and safety**

You must provide a safe and healthy working environment and comply with all health and safety laws that apply to your work. This includes assessing and controlling risks, providing suitable training and protective equipment, reporting and investigating accidents, and ensuring that workers can refuse unsafe work without penalty. Any accommodation you provide to workers must be safe, clean and suitable. Where your people work on customer, FreeClix or third-party sites, such as installing or maintaining network equipment, you must follow the site's safety rules as well.

## **Business integrity**

You must conduct business honestly and lawfully. In particular:

- You must not offer, give, request or accept bribes or improper payments in any form, and must comply with the Bribery Act 2015 and all applicable anti-corruption law.
- You must not offer or accept gifts or hospitality that could influence, or appear to influence, a business decision. Anything beyond modest, occasional hospitality must be declared to us.
- You must tell us promptly of any conflict of interest, including personal or family relationships with FreeClix staff.
- You must keep accurate records and must not take part in tax evasion or the facilitation of it, or in money laundering.
- You must compete fairly and comply with competition law.

## **Data protection, security and confidentiality**

You must keep FreeClix and customer information confidential and use it only for the purpose for which it was provided. If you handle personal data for us, you must comply with the UK GDPR and the Data Protection Act 2018, keep it secure with appropriate technical and organisational measures, and tell us without delay if you become aware of a security incident or data breach affecting FreeClix or our customers' data. You must protect any systems, accounts, equipment or SIM and network credentials we give you access to, and must not share or misuse them.

## **Environment**

You must comply with all environmental laws and permits that apply to your operations, and take reasonable steps to reduce your environmental impact. This includes managing waste responsibly and, where you supply or handle electronic equipment, disposing of or recycling it in line with the Waste Electrical and Electronic Equipment (WEEE) Regulations and other applicable rules.

## **Your own supply chain**

You must hold your own suppliers and subcontractors to standards equivalent to this Code, and must take reasonable steps to understand who is in your supply chain and where the risks are. If you use recruitment agencies or other third parties to supply workers, you must make sure they follow this Code too, and you must not use any who charge workers fees. You must not subcontract work to anyone for FreeClix without telling us first if we have asked for that in our contract or order.

## Compliance, information and audit

We take a risk-based approach to checking that suppliers meet this Code. You agree to:

- complete any modern slavery or due diligence questionnaire we reasonably ask for, accurately and on time
- keep records that show you are complying with this Code, and give us reasonable access to them on request
- tell us promptly if you become aware of, or suspect, a breach of this Code in your business or supply chain
- cooperate with any reasonable audit or review we carry out, or arrange, to check compliance, including on-site visits and, where appropriate, speaking with workers in confidence
- put right any shortfall we identify within a reasonable time agreed with us

## Raising concerns

You and your workers should feel able to raise concerns about breaches of this Code, or about suspected modern slavery, without fear of reprisal. You can contact your FreeClix account contact, or email [concerns email address]. Concerns can be raised in confidence, and anonymously if you prefer. We will look into every concern promptly and fairly, and will not tolerate retaliation against anyone who raises one in good faith.

If someone is in immediate danger, call 999. You can also contact the Modern Slavery and Exploitation Helpline on 0800 0121 700.

## Breaches and remedies

If we find that you have breached this Code, we will first consider whether the breach can be put right, and will work with you to agree a remediation plan with clear actions and deadlines. If the breach is serious, cannot be remedied, or you do not act on the plan in the time agreed, we may suspend orders, withhold payment where our contract allows, or end our relationship with you. Where we suspect criminal conduct, we will report it to the police or other relevant authorities.

## Supplier acknowledgement

On behalf of the supplier named below, I confirm that we have read and understood this Code, that we will comply with it, and that we will pass its requirements on to our own suppliers and subcontractors.

| Item                         | Details |
|------------------------------|---------|
| Supplier name                |         |
| Company number               |         |
| Name of authorised signatory |         |
| Position                     |         |
| Signature                    |         |

| Item | Details |
|------|---------|
| Date |         |

**Version control**

| Version | Date            | Summary of change                                                      | Approved by             |
|---------|-----------------|------------------------------------------------------------------------|-------------------------|
| 1.0     | 16 October 2026 | First issue, supporting Anti-slavery and Human Trafficking Policy v2.0 | [name and role], [date] |

Next review due: October 2027, or earlier if the law changes.