

# Supplier Code of Conduct

## Introduction

At Mace Group, our values aren't just words, they're the standard we live by. They shape how we work, how we lead, and how we partner. That includes our relationships with suppliers.

We expect our suppliers to match our commitment to Safety First, act with Integrity, maintain a sharp Client Focus, and help us Create Opportunity for Everyone.

This Supplier Code of Conduct builds on our Code of Ethics and sets out the behaviours we expect from everyone we work with.

This isn't about ticking boxes. It's about making the right calls, every time. If you're ever unsure, ask yourself: Is this the right thing to do? Would I be comfortable if Mace Group knew?

We're committed to raising standards together. We choose to work with suppliers who share our ambition to improve ethical conduct and deliver excellence, because when we do the right thing, we all succeed.

## 1. Who does the supplier code of conduct apply to?

Mace Group's Supplier Code of Conduct ("the Code") supplements our Code of Ethics. It sets out the standards and practices that Mace Group expects all of its suppliers (including sub-contractors) to follow. Mace Group expects you, as one of its suppliers, to also apply these same standards and practices to the suppliers (and contractors) that you work with throughout your own supply chains.

## 2. What is expected of you?

You are expected to comply with the principles set out in the Code, whilst also adopting practices similar to those in Mace Group's Code of Ethics. Failure to follow the principles set out in the Code may result in Mace Group ceasing to do business with you.

Mace Group is committed to carrying out business in accordance with all applicable laws in the territories in which it operates and conducts business. Where there are differences between local laws and the principles set out in this Code, Mace Group expects you to apply and follow whichever sets the highest standards.

It is important that you read and understand this Code and that you take time to think about how to ensure it is followed within your organisation and throughout your supply chain.

## 3. Raising concerns

We encourage our suppliers to report any concerns to us about compliance with the Code, the Code of Ethics or the law where those concerns are connected to Mace Group.

Generally you should first discuss the matter with senior management within your organisation, who in turn should feel confident to raise it with Mace Group's senior management.

Mace Group will take all reported matters seriously and will treat any concerns you have confidentially.

Mace Group will not tolerate retaliation, victimisation or discrimination against any person who has reported a suspicion or concern in good faith.

## 4. Bribery and corruption

Mace Group has a zero-tolerance approach to bribery in any way in connection with its business. Mace Group expects our suppliers to have in place procedures to prevent bribery and corruption by your employees and associated persons.

Specifically, Mace Group's suppliers and your employees/associated persons must not:

- bribe Mace Group's employees, contractors or staff;
- engage in acts of bribery from which Mace Group may be benefit;
- offer or give gifts, hospitality, contracts, payments or other personal advantages;
- which are intended to influence a person working for Mace Group to favour you/the supplier or to conduct themselves other than in Mace Group's best interests;
- which are intended to improperly influence other persons (for example, an employee of a Mace Group client or contractor) in connection with any contract or project involving Mace Group;
- to influence a public official.

## 5. Gifts and hospitality

To foster good will or good working relationships our employees are permitted to accept or offer gifts or hospitality which are within the bound of recognised normal business practices and are not lavish or excessive. Gifts and hospitality offered and or accepted must be reasonable and proportionate in terms of value, frequency and timing. It is the responsibility on the supplier to ask the recipient(s) what the applicable limits are and to not exceed those limits.

## 6. Fraud prevention

Mace Group has a zero-tolerance approach to fraud across all phases of our projects, including procurement, subcontracting, project delivery, and financial reporting. Mace Group expects our suppliers to have in place procedures to prevent fraud by your employees and associated persons.

Mace Group's suppliers and your employees/associated persons must:

- Act honestly and transparently in all dealings.
- Provide accurate documentation and reporting.
- Cooperate with the Mace Group's fraud prevention procedures, including due diligence and audits.
- Avoid any conduct that could benefit Mace Group through fraudulent means, even indirectly.

Specifically, Mace Group's suppliers and your employees/associated persons must not:

- Submit fraudulent invoices
- Provide false timesheets or labour records
- Falsify test or performance results
- Misrepresent capabilities in tendering
- Fail to pass on contractual rebates
- Make false statements in ESG or financial reporting
- Engage in collusive tendering or bid rigging
- Substitute materials or work without disclosure
- Create or use fraudulent documentation
- Misappropriate client or project funds
- Conceal defects or non-compliance
- Manipulate progress reports
- Engage in undisclosed subcontracting

## 7. Conflicts of interest

Suppliers must also avoid conflicts of interest and where a potential conflict of interest arises you must report it to Mace Group's senior management. Where a potential conflict of interest is disclosed, it is capable of being managed. Where it is not disclosed it will amount to a serious breach of this Code.

Specifically, suppliers must:

- not engage in any interaction with any Mace Group employee/contractor that may impact their ability to act in the best interests of Mace Group. For example, suppliers must not award contracts to businesses established by a Mace Group employee or a family member, spouse or partner of a Mace Group employee without disclosing the proposed contract to Mace Group and obtaining Mace Group's permission to proceed in writing;
- make Mace Group aware if any of your employees are a family relation of any Mace Group employee or if you have any other relationship with a Mace Group employee (or their family members) that may present a conflict of interest.

## 8. Accurate records

Suppliers must only present Mace Group and Mace Group's clients with accurate records. We do not tolerate fraudulent or deceptive practices. Specifically, suppliers must not, in any circumstances:

- submit inaccurate or inflated invoices or expenses;
- engage in any form of double counting of materials;
- book expenses of costs to the wrong project; or
- submit any other record designed to mislead Mace Group or its clients.

## 9. Anti-facilitation of tax evasion

Mace Group has a zero-tolerance approach to tax evasion and the facilitation of tax evasion by its employees and associated persons. Mace Group expects its suppliers to fully comply with their tax obligations and to put in place reasonable prevention measures to prevent the facilitation of tax evasion by the supplier's employees or associated persons.

## 10. Fair competition

Mace Group supports open and fair competition and is committed to complying with competition law (referred to as anti-trust law in some countries) wherever it does business. Competition law prohibits agreements, decisions or practices between companies (however informal) which have a harmful effect on competition, and any harmful or exclusionary conduct by a company which has market power. Mace Group expects its suppliers to comply with competition laws and to have in place procedures to prevent breaches of competition law. Specifically, suppliers must not:

- share with anyone at Mace Group any information that you receive from or about Mace Group's competitors or their bids, prices, any element of price (including discounts, premiums or credit terms), contract terms or other commercially sensitive information;
- share with anyone at Mace Group any information concerning the bids you are making to any of Mace Group's competitors;
- share with any other person, information that you learn about Mace Group's bids, prices, any element of price (including discounts, premiums or credit terms), contract terms or other commercially sensitive information;
- participate in bid rigging by way of bid suppression, complementary or cover bidding, bid rotation, or other mechanisms that limit fair competition in tender situations, when making bids to Mace Group or Mace Group's competitors; and
- participate in any other form of cartel practices with competitors, such as dividing or allocating markets/customers or price-fixing.

## 11. Confidentiality

Documents or other information about Mace Group's business, clients or business partners is confidential and should be held securely and in accordance with contractual obligations. If you become aware of any such information whilst conducting business with Mace Group, it should not be disclosed to anyone outside of the supplier's organisation. Mace Group expects its suppliers to maintain any confidential information as confidential even after your contract with Mace Group has ended. Mace Group must be notified within 24 hours of any breach of confidentiality or data security.

## 12. Data protection

Mace Group is committed to protecting the privacy and data protection rights of the subjects. Mace Group does not tolerate personal data being misused or mishandled. Mace Group has in place a Data Protection Policy and operational and technical standards. Mace Group expects the same of its suppliers. Specifically, suppliers must:

- comply with all applicable data protection laws;
- process personal information in a fair, lawful and transparent manner;
- only collect the personal information required to fulfil the service you are providing and to not further process this information in a manner incompatible with this service;
- implement organisational and technical measures to ensure the integrity and confidentiality of personal information;
- co-operate with and assist Mace Group with any data protection impact assessments or compliance matters which relate to the processing activities being carried out by you on behalf of Mace Group.

## 13. Equality, diversity, bullying and harassment

Mace Group promotes an environment in which all colleagues enjoy equal opportunities and treatment, free from any form of discrimination, victimisation or harassment. Mace Group will not tolerate bullying, harassment or any form of discrimination based on age, disability, sex, gender identity, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or marital status/civil partnership.

Mace Group expects its suppliers to promote the same kind of environment within their organisation and to commit to creating an inclusive working environment where everyone is respected and valued whatever their role, level, qualification, skills or competency.

## 14. Modern slavery and human rights

Mace Group conducts its business in accordance with the principles of, and with respect for, the Universal Declaration of Human Rights. Slavery and human trafficking are crimes and a violation of human rights. Mace Group has a zero-tolerance approach to slavery and human trafficking in its business and supply chain. Mace Group is committed to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking are not taking place anywhere in its business or in any of its supply chains. Mace Group expects the same of its suppliers and their supply chains.

## 15. Healthy, safety, wellbeing and environment

Mace Group aims to be world leading in its health and safety management and is committed to a clean working environment. Mace Group expects its suppliers to continually strive to reduce risks to your people and those impacted by your operations by building a culture where safety first enables employees to go home safe and well. Mace Group expects suppliers to comply with all health and safety and environmental laws, policies, procedures and rules applicable to you and your work activities.

## 16. Sanctions and export controls

Mace Group complies with relevant financial sanctions and export controls. Mace Group expects its suppliers to have in place processes to comply with financial sanctions and export controls. Specifically, suppliers must:

- inform Mace Group if any equipment or technology being supplied to Mace Group is subject to any export controls which may necessitate Mace Group obtaining a licence to use or transfer the equipment or technology;
- inform Mace Group if the Supplier, any director or shareholder, subsidiary or parent company is listed on any UK, EU or other sanctions lists;
- not conduct business with any person or entity that is the target of sanctions or a trade embargo.

## 17. Compliance and ethics

We will seek to work with suppliers which take legal compliance and ethical business seriously. We will support suppliers who are working to put in place processes to meet the expectations of this Code as long as you are transparent with us. If we discover that the Code has been deliberately breached or you do not co-operate with us, we will stop doing business with you.

A handwritten signature in black ink that reads 'Jason Millett'.

**Jason Millett**

Group Chief Executive  
January 2026