

CAP Worldwide Supplier Code of Conduct

Policy Name:	Supplier Code of Conduct		
Company:	CAP Worldwide	Policy Owner(s):	Directors / HR
Policy #:	CAP028	Version:	V1.0
Effective Date:	Jun 2025	Scope:	All CAP Suppliers and Partners
Approved by:	Andrew Hopgood, COO and Jo Layton, CEO		

Introduction and Scope

At CAP Worldwide we are committed to maintaining the highest standards of ethical conduct and sustainability in all aspects of our business. As part of this commitment, we expect our suppliers and partners to uphold similar values in their operations.

This Supplier Code of Conduct outlines the expectations we have for our suppliers and partners, focusing on human rights, labour practices, environmental responsibility, and business ethics.

The purpose of this Supplier Code of Conduct is to:

- Provide clear expectations for ethical business practices.
- Ensure compliance with international standards on labour, human rights, and the environment.
- Foster a relationship of mutual respect and responsibility with our suppliers and partners.
- Support our commitment to sustainability and corporate social responsibility.

This Code of Conduct applies to all suppliers, brand partners, contractors, and subcontractors who provide goods and services to CAP Worldwide. It covers all aspects of the supplier relationship, including labour practices, environmental impact, and ethical behaviour.

Supplier and Partner Expectations

CAP Worldwide is committed to building strong, ethical, and sustainable partnerships with its suppliers and partners. By adhering to this Supplier Code of Conduct, suppliers help us ensure that our operations align with our core values of integrity, responsibility, and sustainability.

CAP Worldwide expects its suppliers to adhere to the following principles:

Labour and Human Rights

- **Fair Wages and Benefits:** Suppliers and partners must ensure that workers are compensated fairly, receiving wages that comply with applicable local laws and regulations, including minimum wage requirements. Workers should also be provided with any legally required benefits.



- **Freedom of Association and Collective Bargaining:** Suppliers and partners must respect the right of workers to freely associate, organise, and bargain collectively without fear of retaliation.
- **Non-Discrimination:** Suppliers and partners must provide a workplace free from discrimination. They must not engage in discriminatory practices based on race, ethnicity, gender, sexual orientation, religion, age, disability, or any other protected category.
- **Child Labour and Forced Labour:** Suppliers and partners must comply with the International Labour Organization (ILO) conventions regarding child labour and forced labour. They must not employ children under the legal minimum age for employment and must ensure that no workers are subjected to forced, bonded, or involuntary labour.
- **Harassment and Abuse:** Suppliers and partners must ensure that workers are not subjected to physical, sexual, verbal, or psychological abuse, harassment, or intimidation.

Health and Safety

- **Safe Working Conditions:** Suppliers and partners must provide a safe and healthy working environment for their employees, in compliance with all local health and safety laws. This includes providing appropriate protective equipment, safety training, and addressing potential workplace hazards.
- **Emergency Preparedness:** Suppliers and partners must have systems in place to manage emergencies and health crises, ensuring workers' well-being in the event of accidents or natural disasters.

Environmental Responsibility

- **Environmental Stewardship:** Suppliers and partners must operate in an environmentally responsible manner. This includes adhering to local and international environmental regulations, reducing waste, conserving energy and water, and minimising environmental impact.
- **Sustainable Practices:** Suppliers and partners are encouraged to adopt sustainable practices in their operations, such as using renewable energy, reducing carbon emissions, and implementing waste recycling programmes.
- **Eco-Friendly Products and Services:** Suppliers and partners should prioritise sustainable materials and eco-friendly products in their offerings, and support efforts to reduce the environmental footprint of their supply chain.

Business Ethics

- **Integrity and Transparency:** Suppliers and partners must conduct business with the highest standards of integrity, honesty, and fairness. This includes ensuring transparency in business dealings and not engaging in any form of corruption, bribery, or unethical conduct.
- **Anti-Corruption:** Suppliers and partners must adhere to anti-corruption laws and policies, and must not engage in practices such as bribery, kickbacks, or facilitation payments.
- **Conflicts of Interest:** Suppliers and partners must disclose any potential conflicts of interest that could affect their ability to operate in an impartial and unbiased manner.
- **Compliance with Laws and Regulations:** Suppliers and partners must comply with all applicable local, national, and international laws and regulations relevant to their operations, including labour laws, environmental regulations, and product safety standards.

Monitoring and Compliance

CAP Worldwide reserves the right to monitor and audit supplier compliance with this Supplier Code of Conduct. Suppliers and partners are expected to provide documentation and access to facilities for audits as required. Non-compliance with this Code may result in corrective actions, including the suspension or termination of the supplier relationship.

Reporting Violations

Suppliers and partners must promptly report any violations of this Code of Conduct, or any concerns related to unethical practices, to the designated contacts at CAP Worldwide.

- Clare Ace – ESG Director – clare.ace@capww.com
- Dan Woodburn – Global Brand Partner Director – dan.woodburn@capww.com

Suppliers will be protected from retaliation for reporting violations in good faith.

Continuous Improvement

CAP Worldwide encourages its suppliers to engage in continuous improvement efforts to enhance their sustainability and ethical practices. We are committed to working collaboratively with our suppliers to support these efforts and ensure ongoing compliance with the principles outlined in this Code of Conduct.

Acknowledgement

By doing business with CAP Worldwide, such as accepting an enquiry or confirming a booking, suppliers acknowledge and agree to comply with the principles outlined in this Supplier Code of Conduct. The Supplier Code of Conduct also forms part of our CAPVerified partner onboarding process, and any new brand partner joining our global supply chain must confirm their acceptance of the terms herein.

Review and Reporting

CAP will periodically review this Supplier Code of Conduct (at least once a year during the management review) and update as necessary to ensure it remains aligned with business objectives and legislative change.

Version 1.0 June 2025

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Version	Change	Date	Author
1.0	Policy Implemented	Jun 2025	AH/JL