



PUBLIC

Firefish Ltd Group Supplier Policy

Firefish Ltd (Firefish, The Numbers Lab and The Pineapple Lounge) is known for excellence and quality and strives to be a trusted business partner. Integral to these values are all the suppliers we have relationships with across our business. This Supplier Policy reflects the business standards Firefish Ltd is committed to. To ensure we meet our goals we expect all suppliers working with any Firefish Ltd company to meet this policy.

Suppliers should have in place policies, procedures and best practice which meet all the expectations of this policy, taking into account applicable local/National legislation relevant to where their business operates. Suppliers are also expected to ensure their own onward supply chain complies in the same way.

1. Business & Performance

Quality Assurance. Suppliers shall maintain a high standard of performance and always be in a position to freely and regularly report on the approach, progress and quality of the services being provided. Suppliers must provide services in a professional manner that meet relevant industry standards and any pre-agreed service levels.

Supplier Personnel. Suppliers must have a staff recruitment and vetting process and carry out sufficient personnel background checks to ensure the suitability of their staff working with us and on our clients' projects. As standard for the U.K. this will include Identity check, Right to Work in U.K., confirmation of reliability and competence for the role being performed checking, for example, previous employment records, CVs and written references. We expect non-UK companies to align to this and conform to any local laws and practises. Suppliers may also be required to conduct further criminal/credit checks on request where a Firefish Ltd company is under a legal or regulatory obligation to ensure they are carried out.

Our Employee Safety. Suppliers are responsible for taking the safety of any Firefish Ltd employees into account when providing services or goods on our behalf. Our policy is to ensure that our employees are not put at risk and where relevant, steps to mitigate any risks are agreed and taken in advance.

Sub-contracting. Suppliers must not use sub-contractors without permission from a Firefish Ltd company and on the understanding that Suppliers are responsible for ensuring any sub-contractors meet this Supplier policy.

Conflict of interest. Suppliers must not allow bias, conflict of interest, or inappropriate influence of others to override its professional judgements and responsibilities when working with Firefish Ltd and are expected to declare any such conflicts under this policy.

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2. Regulations and Legal

Suppliers are responsible for meeting any and all applicable statutory regulations, which cover but are not limited to, good governance and integrity; registration and transparency, all applicable industrial and professional standards, codes, regulations and international guidelines and the collection of all necessary licenses and permissions in the supply of services.

Intellectual Property Rights (IPR). Suppliers understand that any developed IPR as part of a research project or working relationship rests with whoever the commissioning client is. Suppliers must ensure that they do not cause any 3rd party IPR conflict when providing services.

Confidentiality. Suppliers will treat all information received relating to our/our clients' businesses as strictly confidential. Confidential information should not be disclosed to a third party without express permission and on meeting agreed term and conditions.

Data Protection. Suppliers must comply with all applicable legislation in respect of privacy and data protection at all times including, but not limited to, the UK GDPR and EU GDPR. Suppliers must take appropriate technical and organisational measures that are aligned to recognised security standards to protect personal data from unauthorised or unlawful use and from accidental loss, damage or destruction. In particular, Suppliers are expected to process any personal data passed to them by a Firefish Ltd company in accordance with instructions given. If Suppliers believe that any instructions from Firefish Ltd are in conflict with any data protection legislation relevant to where their business operates then they must declare this and agree appropriate measures. Additional data processing agreements may be supplied by us or our clients. Suppliers must be notified with the relevant data protection body where applicable e.g. ICO for U.K.

Information Security. Suppliers must hold adequate technical and organisational policies and processes to uphold information security to a level that, at a minimum, meets accepted industry norms and includes an incident management procedure. Protection of information must be present throughout the life cycle of information exchange. Suppliers should possess the means to ensure secure data collection, data use, data transfer, data storage, data retention and data disposal. Suppliers are also expected to meet any specific information security requirements or policies from us or our clients.

3. Corporate and Social Responsibility

Suppliers should actively strive towards being a responsible employer and company paying particular attention to the following:

Anti-Bribery and Corruption. Suppliers must comply with all applicable laws, statutes, regulations, and codes relating to anti-bribery and anti-corruption including but not limited to the Bribery Act 2010.

Gifts, entertainment, and hospitality

Suppliers must not offer, accept or solicit any gifts, entertainment, or hospitality if this could lead anyone to conclude that in doing so, there would be an intent to improperly influence decisions or create advantage related to any of their business dealings.

Discrimination and Harassment

Suppliers should ensure that all their employees are treated with respect and should strive towards a culture that does not tolerate any form of discrimination or harassment including allowing employees to report concerns without fear of retaliation.

Human Rights and Working Conditions. Suppliers should regulate their workplaces and conform to all relevant national and international principles related to Equality and Human Rights including but not limited to the following; Human Rights Act 1998, UN Human Rights Council, EU Charter of Fundamental Rights, The National Living Wage, International Labour Organisation Standards, Modern Slavery Act 2015, Anti- Discrimination laws.

Health and Safety. Suppliers must regulate health & safety in their workplaces and maintain a framework and policy to keep employees safe from harm.

Environmental Sustainability. Suppliers must actively aim to reduce their environmental impact and be able to demonstrate ways they are achieving this.

How to comply with this policy:

Violations of this Supplier policy will be taken seriously. Suppliers must proactively notify their primary contact at the relevant Firefish Ltd Company if they do not meet any element of this policy, if they suspect or become aware of a violation of this policy or if they need to declare a conflict of interest. This is essential to allow both parties to consult and agree corrective or compensating measures.

Measures could involve the following, or similar:

- asking a Supplier to undergo an audit of its organisation or its supply chain and to report on its findings
- recommending or requiring corrective action plans
- in very serious cases, violation of this policy may lead to termination of contract with a Supplier

Policy Updates. This policy will be revised and updated from time to time in accordance with changes to relevant regulations, legislation or company policies. Suppliers should check they are referring to the most up to date version of this policy.