Halo Benefits

POLICY

Supplier Code of Conduct

The standards we expect from everyone who supplies us.

UPDATED	VERSION	NEXT REVIEW
23 November 2026	2.0	November 2027

Halo Benefits Ltd · Owner: Dionne Clarke, Head of People & Partnerships · Classification: Internal & Public

Document control

Policy owner	Dionne Clarke, Head of People & Partnerships
Approved by	Board of Directors
Date approved	23rd November 2026
Next Review Date	23th November 2027
Review frequency	Annually
Applies to	All suppliers, contractors, consultants, freelancers, agencies, resellers and partners of Halo Benefits Ltd
Related policies	Supplier Security Policy, Modern Slavery Statement, Anti-Bribery and Corruption Policy

Version history

Version	Date	Summary of changes	Author
1.0	30 Oct 2026	First issue	Dionne Clarke
2.0	23 Nov 2026	Rebranded and restructured for clarity and readability	Dionne Clarke

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1. Purpose of the Code

This Code sets out the standards Halo Benefits Ltd expects from its suppliers. It extends our own commitments on ethics, anti-bribery, modern slavery, health and safety, the environment, data protection and sanctions to our supply chain. Our expectations are proportionate to our size, but they are not optional.

2. Scope

This Code applies to all suppliers, contractors, consultants, freelancers, agencies, resellers and partners providing goods or services to **Halo Benefits Ltd** (company number 17577358), and to their employees and subcontractors. We expect suppliers to pass equivalent standards on to their own supply chains in a proportionate way.

Where a supplier has its own code or policies that meet or exceed these standards, we will accept them as meeting this Code.

3. Law, ethics and sanctions

- Comply with all laws that apply where you operate, including those on employment, health and safety, the environment, data protection, competition, bribery, sanctions and tax.
- Never offer, give, request or accept bribes or any improper advantage, including facilitation payments, in line with the UK Bribery Act 2010.
- Do not offer our staff gifts or hospitality worth more than £50, or of any value during a tender or negotiation.
- Keep accurate books and records, and never help anyone evade tax.
- Comply with UK sanctions and any other relevant sanctions and export rules, never supply goods or services involving sanctioned people or countries, and tell us promptly if you or your owners become subject to sanctions.
- Tell us about any personal or financial relationship with our staff that could create a conflict of interest, and never take part in bid-rigging, price-fixing or other anti-competitive behaviour.

4. Modern slavery and fair labour

- Comply with the Modern Slavery Act 2015. Never use forced, bonded, compulsory or prison labour, or be involved in human trafficking.

- Never require workers to pay recruitment fees or hand over deposits or identity documents, and allow them to leave on reasonable notice.
- Never use child labour. Workers must be at least the legal minimum working age, and never under 15, and young workers must not do hazardous work.
- Pay at least the legal minimum wage. For people working on our premises or regularly on our contracts in the UK, we expect at least the Real Living Wage.
- Respect legal limits on working hours, and provide rest days, paid leave and written terms of employment in a language workers understand.
- Respect workers' freedom of association and right to collective bargaining.
- Never discriminate on the basis of any protected characteristic, and never tolerate harassment, bullying or abuse.

5. Health, safety and the environment

- Provide safe and healthy working conditions, assess and control risks, provide appropriate training and equipment, and follow any site rules when working on our behalf.
- Comply with environmental law and have an environmental policy proportionate to your size.
- Work to reduce energy use, emissions and waste, and dispose of electronic equipment in line with the WEEE Regulations, with certified data erasure.
- Provide emissions or environmental data on reasonable request, to support our own measurement and Carbon Reduction Plan.

6. Data protection and security

Suppliers that process personal data or access our systems must:

- comply with UK GDPR and the Data Protection Act 2018, and sign a data processing agreement where they act as our processor;
- only process data on our documented instructions, and never transfer it outside the UK without appropriate safeguards;
- maintain appropriate security measures, including access control, multi-factor authentication, encryption and timely updates;
- tell us without undue delay, and in any case within **24 hours**, of any personal data breach or security incident affecting our data, at security@halobenefits.co.uk; and

- never use our data or our customers' data to train AI models, or for any other purpose, without our written agreement.

7. Checks and audits

We may ask suppliers to complete a questionnaire, share relevant policies or certificates, or confirm that they accept this Code. With reasonable notice, and in proportion to the risk and value of the relationship, we or an appointed third party may check a supplier's compliance. We expect suppliers to cooperate and to agree an action plan to fix any gaps.

8. If standards are not met

Where a supplier falls short of this Code, we will normally work with them to put things right. Serious breaches, including bribery, forced or child labour, or a failure to fix problems, may lead to us ending the relationship.

9. Roles and responsibilities

- **Board of Directors:** oversees supplier risk.
- **Ethics Director:** a designated director who coordinates supplier checks and handles concerns.
- **Staff who engage suppliers:** share this Code when onboarding a supplier, record the supplier's acceptance and escalate concerns.
- **Suppliers:** comply with this Code and pass its principles on to their own supply chains.

10. Reporting concerns

Suppliers, their workers and anyone else can report concerns about breaches of this Code, or about the conduct of our staff, to **compliance@halobenefits.co.uk** or to our Ethics Director. Security incidents should be reported to security@halobenefits.co.uk. Reports can be made confidentially, and independent advice is available from Protect, the UK whistleblowing charity. We will not tolerate retaliation against anyone who raises a concern in good faith.

11. Review

This Code is reviewed annually, and sooner after any significant change in the law, our business or our supply chain risks. The Head of People & Partnerships proposes changes and the Board of Directors approves them.

> **QUESTIONS ABOUT THIS POLICY?**
> Contact Dionne Clarke, Head of People & Partnerships, at dionne@halobenefits.co.uk.