



The Goodwood Group
Supplier Code of Conduct

Purpose and Scope

Goodwood is committed to ethical business practices, ensuring responsible procurement, protecting the environment and promoting sustainable practices, and safeguarding the health, safety, and wellbeing of all workers. This Supplier Code of Conduct (“Code”) sets out the minimum standards of ethical, social, environmental, and legal standards expected of all suppliers that provide goods and services to the Goodwood Group (“Suppliers”).

Supplier Commitment

Suppliers must comply with this Code and shall ensure that all employees, workers, agents, subcontractors, and sub-suppliers also meet its requirements.

Compliance with Laws and Regulations

The Supplier shall comply with all applicable laws, regulations, and industry standards relevant to its operations, and any legal or regulatory requirements from time to time in force applicable to its engagement with Goodwood.

Workforce Standards

Slavery, human trafficking and child labour.

The Supplier shall comply with all applicable anti-slavery and human trafficking laws, including the Modern Slavery Act 2015, in any part of its supply chain. This includes not supporting or engaging or requiring any forced labour and the use of child labour.

Human Rights

The Supplier shall uphold all internationally recognised human rights including those in the International Bill of Human Rights and the core labour rights set out by the International Labour Organisation.

Equal Opportunities

The Supplier shall ensure equality in all employment practices and shall not discriminate based on protected characteristics. Decisions must be based solely on a worker’s ability to perform the job, subject to legal accommodations.

Freedom of Association and Collective Bargaining

The Supplier shall respect workers’ rights to form or join trade unions and engage in lawful collective bargaining.

Wages and remuneration

Suppliers shall pay wages and benefits that meet or exceed:

Legal minimums

Collective agreements

Industry standards

Amounts sufficient to meet basic living requirements

Harassment

Goodwood does not tolerate any form of harassment in the workplace. The Supplier must maintain a workplace free from all forms of harassment, including harassment related to any protected characteristics, and take proactive measures to prevent it.

Whistleblowing and non-retaliation

The Supplier shall provide confidential channels for raising concerns and shall prohibit retaliation against anyone reporting issues in good faith.

Health & Safety

Safe Working Conditions

The Supplier must provide and maintain a safe, healthy, and legally compliant working environment in line with all applicable UK health and safety legislation. This includes proactively identifying, assessing, and controlling workplace risks and ensuring appropriate safety measures are implemented. Hazards, incidents, and accidents must be reported, investigated, and addressed promptly.

Risk Assessments

The Supplier must conduct regular and documented risk assessments covering all relevant work activities, equipment, substances, and environments. These assessments must identify potential hazards, evaluate the level of risk, and implement effective control measures. Risk assessments must be reviewed periodically and whenever significant changes occur in operations, processes, or workplace conditions.

Emergency Preparedness

The Supplier shall maintain emergency preparedness measures, including clear procedures, trained personnel, and necessary equipment to ensure a safe and effective response to any emergency.

Safe Machinery and Equipment

The Supplier shall provide and maintain safe machinery, tools, and equipment, ensuring they are regularly inspected, fit for purpose, and operated only by trained, competent personnel.

Training

The Supplier shall provide workers with appropriate and ongoing training to ensure they are competent, informed, and able to perform their duties safely, responsibly, and in compliance with applicable laws and standards.

Sustainability

The Supplier shall:

- (a) Comply with all applicable environmental laws, including laws relating to climate change, waste disposal, emissions, discharges and the handling of hazardous and toxic materials;
- (b) Comply with Goodwood's Sustainability Policy [LINK];
- (c) Ensure goods and components meet all relevant environmental laws;
- (d) Use only legally compliant packaging materials;
- (e) Take steps to continuously improve environmental performance and reduce pollution, emissions, water usage and waste;
- (f) For all waste activities, provide duty-of-care documentation and material-sourcing logs upon request;
- (g) Report any environmental incidents immediately and ensure they are addressed proactively and in line with appropriate environmental management practices;
- (h) Provide any sustainability data requested by Goodwood from time to time.

Responsible Sourcing & Supply Chain

Responsible Sourcing of Materials

The Supplier shall ensure all materials are sourced responsibly, ensuring traceability, sustainability and ethical production. Materials must not be sourced from sanctioned regions or high-risk areas associated with human rights abuses or conflict minerals.

Natural Resources Procurement

Natural resources such as timber, palm oil, minerals must come from legal, sustainable, and responsibly managed sources. All timber must be FSC-certified and fully traceable and with supporting documentation and traceability logs on request.

Animal Welfare in the Supply Chain

The Suppliers must ensure humane treatment and comply with recognised animal welfare standards.

Supply Chain Transparency

The Supplier shall maintain transparency throughout its supply chain and provide information to Goodwood upon request.

Supply Chain Risk Assessment

The Supplier shall regularly assess ethical, legal, and environmental risks within its supply chain and implement controls to mitigate identified risks.

Subcontractor Compliance

The Supplier shall conduct due diligence and monitor all subcontractors, ensuring they meet and comply with all applicable laws and shall not engage any party who cannot comply. Suppliers shall remain fully accountability for subcontractor actions.

Data Protection and Information Security

Protection of Personal Data

The Supplier must comply with all applicable data protection laws, including the UK GDPR, and ensure personal data is secure and used only for legitimate business purposes.

Information Security

The Supplier shall have in place appropriate measures to protect the integrity and confidentiality of information processed or held on behalf of Goodwood (which include physical and online or electronic systems) and ensure that there is no unauthorised access of the information by third parties.

Cyber Security

The Supplier shall maintain robust cyber-security controls, systems, and practices to safeguard its networks, systems, and data, and report any actual or suspected cyber incident that could impact Goodwood.

Confidential Information

The Supplier shall protect all confidential information shared by Goodwood, use it solely for the purpose of fulfilling its obligations under its agreement with Goodwood, and shall not disclose it to any third party without Goodwood's prior written consent.

Artificial Intelligence (AI)

The Supplier shall:

- Notify Goodwood in advance if AI systems will be used in the supply of goods or services;
- Design, develop, deploy, and monitor AI systems responsibly, ensuring they are safe, secure, and robust;
- Not use AI in ways that respect human rights, fairness, equality, diversity, privacy, and data protection, and avoid discrimination or bias;
- Be transparent about when and how AI is used;
- Not use or retain Goodwood data for AI training without prior written consent;
- Maintain governance and risk-management frameworks to ensure responsible use of AI.

Bribery and Corruption

The Supplier shall comply with all applicable laws, including the Bribery Act 2010, Criminal Finances Act 2017, and the Economic Crime and Corporate Transparency Act 2023 and shall not:

- Offer or accept bribes, facilitation payments, kickbacks, or improper advantages;
- Provide unlawful political contributions or things of value to obtain an improper benefit;
- Engage in fraud or tax evasion or facilitate tax evasion by others.

Monitoring

Self-monitoring and reporting breaches

The Supplier shall monitor its compliance with this Code and promptly report any actual or suspected breaches to legal@goodwood.com.

Goodwood reserves the right to amend this Code at any time.