



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 principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Equal Opportunities

Suppliers shall ensure equality in all employment practices and not discriminate 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

Suppliers 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. Suppliers 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

Suppliers 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 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.

Prosecutions and Enforcement

The Supplier shall notify Goodwood promptly of any HSE prosecution or enforcement action relating to its operations.

Sustainability

Suppliers 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;
- (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, 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, with supporting documentation and traceability logs provided upon request.

Animal welfare in the supply chain

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

Supply chain transparency

Suppliers shall maintain transparency throughout their supply chains and shall provide relevant information 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 accountable for subcontractor actions.

Data Protection and Information Security

Protection of personal data

The Supplier must comply with all applicable data protection and privacy laws, including the UK GDPR and the Data Protection Act 2018. The Supplier shall process personal data lawfully, fairly and transparently, use it only for authorised business purposes, and maintain appropriate records and procedures to demonstrate compliance with applicable legal requirements.

The Supplier shall promptly notify Goodwood of any actual or suspected data breach or regulatory enquiry relating to Goodwood's personal data.

Information Security

Suppliers 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 and be able to demonstrate cyber security controls appropriate to the nature of its engagement with Goodwood, including as a minimum: multi-factor authentication for accounts with access to Goodwood systems or data; regular patching of operating systems and software; endpoint protection; and access management controls. The Supplier shall notify Goodwood within 24 hours of discovering any actual or suspected cyber incident that affects, or could affect, Goodwood's systems, data, or operations, including confirmed unauthorised access, ransomware, or credential compromise.

Confidential Information

The Supplier shall protect all confidential information shared by Goodwood, use it solely for the purpose of delivering the contract, and shall not disclose it to any third party without prior written consent.

Artificial Intelligence (AI)

Suppliers 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;
- 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

Suppliers shall comply with all applicable laws, including the Bribery Act 2010, Criminal Finances Act 2017, and the Economic Crime and Corporate Transparency Act 2023. Suppliers 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

Suppliers shall monitor their 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.