

Responsible sourcing policy

Videndum plc

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Videndum sources components, materials and services on a worldwide basis. We therefore recognise that our supply chain activities have a broad impact, with our responsibilities extending beyond our own operations, and into those of our suppliers. We also recognise that there are local and national differences in standards in relation to many aspects of a supplier's business, however there are a number of minimum standards that must be achieved by all and are set out in this policy.

Videndum's Responsible Sourcing Policy was developed in 2021 to reinforce our commitment of working together with our suppliers towards a long-term, sustainable and successful future for all parties. Some elements of this policy have been in place for several years, and are formally documented for the first time. Videndum together with its suppliers must adhere to the United Nation's 10 Principles of the Global Compact covering: Human Rights, Labour, Environment, and anti-corruption.

Scope and coverage

This policy applies to all Videndum employees engaged in purchasing and sourcing activities. It applies also to consultants, contractors and agency staff in relation to their work for, or on behalf of, Videndum. The purpose of this policy is to set out the key elements and principles of global sourcing.

- *The key principles governing all Videndum Divisions purchasing activities, in particular sourcing of finished goods and raw materials, in a compliant and responsible way, and in a way that is consistent with Videndum's Code of Conduct and values.*
- *Specific procedures which must be followed by all persons involved in sourcing, and the key principles must be adhered to by our suppliers.*

Environmental standards

We must encourage our key suppliers, including manufacturing contractors to measure, manage and report their carbon emissions. This will form part of Videndum's long-term reporting of emissions starting in 2022 (Scope 3 supply-related emissions).

We must work with these suppliers to ensure that they continuously improve their product packaging in terms of weight, recyclable content and use of plastics.

All hazardous waste and hazardous substances use within the manufacturing process must be declared to Videndum.

The risk assessment related to new and current suppliers should consider how old the machinery is, and investment in greener technologies.

Health and safety

For key suppliers and manufacturing contractors, you must be satisfied that the supplier has implemented adequate procedures to maintain a safe and secure environment, and that there is a clear, publicly-available health and safety policy statement in place.

The supplier must evidence the existence of an appropriate health and safety risk management system and first aid. Appropriate arrangements are in place for any visitors to the site.

Human rights and labour standards

Key suppliers and manufacturing contractors must be reviewed to validate their compliance with UN

guidance on human rights. Suppliers are expected to treat their workers equally and with respect and dignity.

Videndum must be satisfied that there is adequate supporting evidence that forced labour and child labour are prohibited; wages are at least above minimum legal standards; working hours comply with local directives and no employees work more than 60 hours in any given week. Appropriate HR policies are in place.

IT security and data protection

You must consider the IT security of any new supplier relationship. This risk may be heightened if the suppliers' systems and processes will interface in any way with Videndum (as may be the case, for example, when warehouse providers' systems are synchronised with Videndum's). You may need to obtain assurances from the suppliers regarding their IT security controls, and their activities to raise awareness of IT security risks.

If personal data will be sent to the supplier in the course of running the business, then a data processing agreement must be put in place, or a specific new paragraph added to the agreement. Please contact your data protection lead for more information.

Taxation

All employees and agents involved in managing suppliers should be vigilant to the risk of tax evasion. We may not be complicit with any activities which help to facilitate the avoidance of tax evasion, for example a supplier requiring to be paid through an offshore tax location.

Anti-bribery and corruption

See guidelines included in Videndum Anti-Bribery and Corruption Policy

Conflict minerals and sanctions regimes

For any minerals sourced by Videndum, a country of origin assessment needs to be conducted with the supplier to ensure that this does not emanate from a region or country affected by conflict.

Assessing suppliers' responsibility

Navex Risk Rate

Videndum uses NAVEX Risk Rate to screen background checks on the reputational risks around a new business partner and we abide with all economic sanctions. Trade sanctions are complex and constantly changing and advice should be sought in advance from the Group General Counsel and Group Company Secretary. When engaging a new business partner you should ensure to carry out a background check through NAVEX Risk Rate. To do this contact the Group Company Secretary.

Selection of new suppliers

Ethical and environmental considerations must form part of the selection criteria for any new key supplier and manufacturing contractors. Standard questionnaires have been developed by procurement; the nature and extent of procedures will depend on the risks involved, for example additional procedures would be performed in respect of the Environmental process for a supplier of batteries. For a payroll provider, specific procedures must be designed in relation to data management. For key new suppliers and manufacturing contractors, a detailed site inspection must be carried out as part of the selection process, the results and conclusions must be documented and retained.

Periodic inspections

The nature and extent of review activities is commensurate to each supplier's risk.

All manufacturing subcontractors and major suppliers should normally be audited annually, any departure from this rule must be documented in writing and cleared with the divisional

CEO. The coverage of the audit must include the key operational matters in addition to the aforementioned dimensions of responsible supply.

It may be possible to rely to an extent on third party sustainability reports such as SEDEX/OEKO-TEX, and also on ISO and equivalent forms of accreditation, however the coverage, scope and methodology must be carefully verified.

Level 2 suppliers

We must have full visibility of the end-to-end supply chain for products and services involving multiple levels of suppliers. We must ensure that our evaluation or that of the supplier, encompasses the entire supply chain.