

# Supplier Code of Conduct

**Effective from** June 2025

**Review date** June 2026

MJ Gleeson plc ("Gleeson") specialises in low-cost house building and land promotion. Gleeson Homes builds high-quality affordable homes, where they are needed and for the people who need them the most. We often build in areas of deprivation or on brownfield sites, regenerating land, building communities and enhancing the surrounding environment. Gleeson Land promotes land through the complex planning system. It unlocks value to deliver sustainable and attractive sites for new homes.

As a house builder and land promoter we recognise the environmental impacts of the built environment through material and resource use, and increased urbanisation. We also recognise that our activities have a wide range of impacts on socio-economic and environmental factors across the supply chain.

This code of conduct establishes and articulates what is expected from our supply chain partners and is supported by the following policies / statements, all are available online at [MJ Gleeson plc - Policies](#):

- Modern Slavery Policy
- Whistleblowing Policy
- Human Rights Policy
- Health & Safety Policy Statement
- Environmental Policy Statement

## United Nations Global Compact (UNGC)

In 2022, Gleeson became a participant of the UNGC incorporating the Ten Principles of the UN Global Compact into our strategy, policies and procedures, and establishing a culture of integrity around people and the planet. Our supply chain partners must adhere to these ten principles across human rights, labour, environment and anti-corruption.

### Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

### Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

## Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges; Principle 8: undertake initiatives to promote greater environmental responsibility; and Principle 9: encourage the development and diffusion of environmentally friendly technologies.

## Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Whilst we do not expect our supply chain partners to become participants of the UNGC, we do expect all supply chain partners to understand, respect and work to the above principles.

## Human & Labour Rights

Our human rights policy details the full extent of Gleeson's commitments. Our supply chain partners must uphold these principles of human and employee rights and in accordance with applicable national and international law. Our supply chain partners must:

- Protect fundamental human rights of all employees, including the right to water;
- Comply with applicable wage, work hours, overtime and benefits laws;
- Protect women's rights;
- Respect employee rights with regard to worker representation, freedom of association and collective bargaining;
- Comply with all applicable health & safety laws;
- Operate free from discrimination or harassment on the basis of race, sex, ethnicity, national or social origin, religion, age, disability, sexual orientation, political opinion or any other protected characteristic;
- Prohibit the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking;
- Child labour - prohibit the recruitment and employment of young people who are below the minimum school leaving age in any country<sup>1</sup>; and
- Comply with its obligations under the Modern Slavery Act 2015.

<sup>1</sup>The International Labour Organisation (ILO), Convention 138 establishes this age at 15 and must not include any hazardous work before the age of 18)

## Whistleblowing

Our supply chain partners must provide a robust whistleblowing process which allows their employees to report any incidents or concerns anonymously, safely and without repercussion.

Should any of our supply chain partners become aware of, or have any concerns relating to unethical behaviour pertaining to their work with Gleeson, then it should be reported immediately, by either:

- Telephoning our Whistleblowing helpline provider: SeeHearSpeakUp on 0800 988 6818 or Email to: [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk).

or

- Email Gleeson's dedicated Whistleblowing reporting mailbox:  
[speakup@mjgleeson.com](mailto:speakup@mjgleeson.com)

## Real Living Wage

Gleeson are an accredited Real Living Wage employer through the Living Wage Foundation. This means that all directly employed staff are paid the Real Living Wage\* as a minimum, along with those subcontractors who are providing a service on our behalf. Our subcontractors must pay their employees the Real Living Wage.

We encourage our wider supply chain partners such as those providing materials and products to implement the real Living Wage across their own supply chain and ideally to gain accreditation through the Living Wage Foundation.

\*excludes apprentice scheme staff

## Bribery and Anti-corruption

Gleeson is committed the highest standards of ethical conduct and integrity in its business activities. We will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on our behalf. Our supply chain partners must uphold the same high standards. You should never offer, promise, give, solicit, accept or receive any gift, payment or other benefit which would reward improper conduct or influence any decision.

## Tax

In 2020, Gleeson became the first house builder to achieve Fair Tax Mark Foundation accreditation, which is the Gold standard for responsible tax conduct. Our supply chain partners must conduct their business in accordance with all applicable tax laws and to:

- Not commit tax evasion;
- Not knowingly assist others to commit tax evasion; and
- Ensure your own supply chain is not committing or complicit in tax evasion.

## Conflict of Interest

Gleeson strives to conduct its business in a professional and ethical manner and actively avoiding any potential conflicts of interest. Our supply chain partners must conduct their business in the same way. Therefore, should you have concerns or be aware of any potential, actual or perceived conflict of interest, then it must be disclosed to us at the earliest opportunity.

## Environment

We recognise that although encouraged, certification to ISO 14001:2015 Environmental Management System may not be viable for all of our supply chain partners, however, there are three core requirements which our supply chain partners must commit to:

- Compliance with all applicable environmental law & legislation;

- Protection of the environment; and
- Prevention of pollution.

There are many environmental impacts through the manufacture, supply and use of the products we procure and use, however we have identified three key impact areas:

#### Carbon Emissions

The vast majority of our carbon emissions arise from purchased goods and services and the in-use emissions of our homes. The decarbonisation of our supply chain will be critical in delivering on our decarbonisation plan and achieving net zero. We encourage our supply chain partners, where appropriate, to commit to and set science based targets through the Science Based Targets initiative or develop other meaningful carbon reduction / neutrality strategies. Where possible, we will favour products and materials where Environmental Product Declarations (EPDs) are available. Therefore, we would encourage those supply chain partners who provide products and materials to Gleeson to develop and provide Environmental Product Declarations (EPDs).

#### Timber

Gleeson is committed to only procuring and using sustainability sourced timber in the construction of new homes.

- Timber must be from an approved sustainable source, whether PEFC® (Programme for the Endorsement of Forest Certification) or FSC® (Forestry Stewardship Council).
- Our supply & fit contractors must only source certified sustainably sourced timber.
- Our supply chain must hold certification / evidence and traceability of sustainably sourced timber.

#### Packaging

We acknowledge that products and materials must be supplied and delivered in a safe manner and that packaging is required to ensure that product quality is maintained. However, we encourage our supply chain partners to evaluate and reduce / optimise packaging wherever possible, ensuring that safety and quality are not compromised. Where packaging is required, this should be fully recyclable to reduce the environmental impact and we would welcome any dialogue on packaging repatriation and other circular opportunities.

### Supply Chain Sustainability School

Gleeson are partners of the Supply Chain Sustainability School. Membership to the 'School' is free and provides access to CPD accredited learning resources. We encourage our supply chain partners to register and use the 'School's' resources [www.supplychainschool.co.uk](http://www.supplychainschool.co.uk)

### Communication

This policy is available on our website and is always accessible to all colleagues through internal information systems and supports our Environmental Policy Statement.

Any changes to this policy are communicated to all colleagues through bulletins and other appropriate communication methods.

## Enforcement of Policy Requirements

All supply chain partners must provide signed acceptance of this policy and its requirements which will form part of our supplier onboarding process. Failure to provide signed conformation of acceptance will result in that supply chain partner being excluded as an approved supplier.

Where there is a policy update, all existing supply chain partners will be provided with revised version requiring signed acceptance of the revised policy. Again, failure to provide signed acceptance will result in that supply chain partner being excluded from the approved supplier list thus preventing future business engagement.

## Review of Policy Statement

This policy will be reviewed

- at least annually and / or;
- where there is a change in operation or scope which may impact this policy

Signed by



Date: 09 June 2025