Document ID: TPMG-POL-013
Title: Supplier Code of Conduct
Version: 1.0
Status: Approved
Approved by: Giedre Beige - Director

TPMG Supplier Code of Conduct

1. Purpose

TPMG is committed to conducting business with integrity, professionalism and accountability.

This Supplier Code of Conduct explains the standards TPMG expects from suppliers, contractors, subcontractors, consultants, specialists, delivery partners and other third parties who provide goods or services to TPMG or support TPMG's delivery model. It is intended to give clients, suppliers and other stakeholders confidence that TPMG expects lawful, ethical and responsible conduct across its supply chain and delivery network.

This Code is a high-level statement of TPMG's expectations. It does not replace applicable laws, regulations or contractual obligations. It sits alongside those obligations and may be supported by additional requirements in contracts, statements of work, onboarding questionnaires, confidentiality terms, data processing terms, security schedules or supplier assurance documents.

---

2. Scope

This Code applies to all suppliers and third parties engaged by, supplying to, representing, or otherwise acting on behalf of TPMG, including where relevant:

- contractors and subcontractors;
- consultants and specialists;
- temporary labour and agency personnel;
- technology and platform providers;
- trainers, assessors and delivery partners;
- outsourced service providers; and

- any other party whose work may affect TPMG, its clients, data, people, operations or reputation.

Suppliers are expected to ensure that their own personnel, subcontractors, representatives and relevant downstream partners understand and comply with the standards set out in this Code where those standards are relevant to the goods or services being supplied.

---

3. Our Expectations

TPMG expects suppliers to:

- act lawfully, ethically and professionally;
- operate with honesty, integrity and transparency;
- protect people, information and reputation;
- respect human rights and fair working standards;
- support safe and healthy working practices;
- manage environmental responsibilities proportionately;
- maintain appropriate controls over data, confidentiality and security;
- cooperate with reasonable assurance, due diligence and corrective action requirements; and
- raise concerns promptly where breaches, risks or issues arise.

---

4. Ethics and Transparency

4.1 Integrity in business conduct

Suppliers must conduct business honestly and in good faith. Misrepresentation, concealment of material facts, misleading statements, falsified records, forged documents, dishonest billing, or any other form of deliberate deception is not acceptable.

4.2 Conflicts of interest

Suppliers must avoid actual, potential or perceived conflicts of interest that could compromise impartiality, objectivity or fair dealing. Any relationship, interest or circumstance that could reasonably influence business judgement or decision-making in relation to TPMG should be disclosed promptly.

4.3 Gifts, hospitality and inducements

Suppliers must not offer, request, give or accept gifts, hospitality, payments or other benefits that could improperly influence — or appear to influence — business decisions, procurement, approvals or professional judgement.

Reasonable and proportionate business hospitality may be acceptable in limited circumstances, but cash, cash equivalents, secret payments, kickbacks, or benefits designed to secure an improper advantage are not permitted.

4.4 Anti-bribery and anti-corruption

TPMG expects zero tolerance for bribery and corruption. Suppliers must comply with applicable anti-bribery and anti-corruption laws and maintain proportionate controls to prevent bribery in their own operations and relevant supply chains. The Ministry of Justice guidance to the Bribery Act sets out six core principles for adequate procedures: proportionality, top-level commitment, risk assessment, due diligence, communication and monitoring/review. (gov.uk)

4.5 Whistleblowing and speaking up

Suppliers are expected to provide an appropriate route for workers and relevant personnel to raise concerns about wrongdoing, misconduct, unsafe practices, illegal behaviour or unethical conduct without fear of retaliation. Concerns relevant to TPMG or its clients should also be escalated promptly to TPMG where appropriate.

5. Legal and Regulatory Compliance

5.1 Compliance with law

Suppliers must comply with all laws, regulations and legally binding requirements that apply to their operations, workforce, products, services and jurisdictions of operation.

5.2 Fraud and dishonesty

Suppliers must not engage in fraud, fraudulent misrepresentation, theft, dishonesty, false accounting, falsification of records, misuse of assets or any other form of improper conduct.

5.3 Tax evasion and facilitation

Suppliers must not engage in tax evasion or in the facilitation of tax evasion and are expected to maintain reasonable procedures to prevent such conduct where relevant.

5.4 Fair competition

Suppliers must compete fairly and lawfully. Anti-competitive conduct such as bid-rigging, price-fixing, unlawful market sharing or the inappropriate exchange of competitively sensitive information is not acceptable.

5.5 International trade and sanctions

Where relevant to the goods or services supplied, suppliers must comply with applicable trade, customs, export control, sanctions, anti-money laundering and related legal requirements.

---

6. Data Protection, Confidentiality and Information

Security

6.1 Confidentiality

Suppliers must protect confidential information relating to TPMG, its clients, learners, partners, suppliers and other stakeholders. Confidential information must only be accessed, used, disclosed or retained where authorised and necessary for the agreed purpose.

6.2 Data protection

Where suppliers process personal data for or on behalf of TPMG, they must comply with applicable data protection laws and support TPMG's data protection and privacy requirements. Where a supplier acts as a processor, ICO guidance requires controllers to use processors that provide sufficient guarantees and to put appropriate contractual terms in place. (ico.org.uk)

6.3 Information security

Suppliers must apply appropriate technical and organisational measures to protect information against accidental or unlawful destruction, loss, alteration, unauthorised access or disclosure. This may include access control, secure storage, authentication, backup, secure transfer, incident reporting and proportionate staff awareness.

6.4 Incident reporting

Suppliers must notify TPMG promptly of any actual or suspected information security or data protection incident that could affect TPMG, its data, its clients, or its stakeholders.

6.5 International transfers and sub-processing

Where suppliers use sub-processors, offshore resources or international data transfers, TPMG expects suppliers to ensure that lawful and appropriate safeguards are in place

and disclosed where required.

---

7. Human Rights and Labour Standards

7.1 Respect for human rights

Suppliers are expected to respect internationally recognised human rights and to avoid causing, contributing to, or being directly linked to human rights abuses through their operations or supply chains.

7.2 Child labour

Suppliers must not use child labour in breach of applicable law and must take reasonable steps to ensure that child exploitation is not present in relevant supply chains.

7.3 Forced labour, trafficking and modern slavery

Suppliers must not use forced, bonded, compulsory or trafficked labour and must not tolerate slavery or servitude in their operations or supply chains. UK government guidance confirms that certain organisations meeting the statutory threshold must publish annual modern slavery statements, but TPMG expects all suppliers — whether legally required to publish or not — to act responsibly and lawfully in this area. (gov.uk)

7.4 Fair treatment and non-discrimination

Suppliers must support fair, respectful and lawful treatment of workers and must not unlawfully discriminate, harass or victimise workers or applicants.

7.5 Working hours, pay and conditions

Suppliers must comply with applicable laws relating to wages, working time, employment status and working conditions, and should seek to treat workers fairly and

with dignity.

7.6 Freedom of association

Suppliers must respect lawful rights relating to freedom of association and collective representation where applicable.

---

8. Health, Safety and Wellbeing

8.1 Safe and healthy working conditions

Suppliers must provide safe and healthy working conditions and must manage risk so far as is reasonably practicable for workers and others who may be affected by their activities. HSE confirms that the Health and Safety at Work etc. Act 1974 remains the main health and safety law in Great Britain and places general duties on employers and others. (hse.gov.uk)

8.2 Risk assessment and control

Suppliers must identify hazards, assess risks and apply suitable controls relevant to the nature of the work being performed.

8.3 Competence and training

Suppliers must ensure that workers are competent for the activities they carry out and that appropriate information, instruction, supervision and training are provided.

8.4 Incident management

Suppliers must report, investigate and respond appropriately to incidents, near misses and unsafe conditions, including legal reporting where required.

8.5 Welfare, equipment and PPE

Where relevant, suppliers must provide suitable welfare arrangements, equipment, protective measures and safe systems of work.

---

9. Environmental Responsibility and Sustainability

9.1 Compliance and responsible practice

Suppliers must comply with applicable environmental laws and are expected to manage environmental responsibilities proportionately to the nature and scale of their activities.

9.2 Resource efficiency and waste

Suppliers should seek to reduce unnecessary waste, use resources responsibly, and encourage re-use and recycling where practicable.

9.3 Pollution prevention and environmental control

Suppliers should take reasonable steps to prevent pollution, environmental damage and avoidable environmental harm arising from their operations.

9.4 Environmental management

TPMG expects suppliers to have an environmental or sustainability approach appropriate to the size and nature of their operations, particularly where their work may affect TPMG's clients, sites, data centres, logistics, estates or wider supply chain outcomes.

9.5 Supply chain influence

Suppliers are encouraged to promote responsible environmental conduct within their

own supply chains where relevant.

10. Social Responsibility and Conduct

Suppliers are expected to contribute to a responsible working environment and business culture.

This includes, where relevant:

- respecting diversity, dignity and inclusion;
- supporting workforce wellbeing;
- treating people fairly and professionally;
- avoiding harassment, abuse or intimidation;
- considering community and stakeholder impact where relevant; and
- cooperating with reasonable standards relating to social value, community benefit or responsible employment where these are part of the service or contract.

11. Governance, Controls and Record Keeping

Suppliers are expected to maintain reasonable governance arrangements relevant to the goods or services they provide. This may include:

- clear accountability and decision-making;
- appropriate policies, procedures or statements;
- reliable record keeping;
- internal monitoring and review;
- escalation of concerns or breaches; and
- support for lawful and ethical delivery.

Where TPMG requests information or evidence relevant to supplier onboarding, renewal, due diligence, assurance or audit, suppliers are expected to cooperate in a timely and accurate manner.

12. Use of Subcontractors and Third Parties

Suppliers remain responsible for ensuring that subcontractors, downstream providers, specialists and other third parties they use in connection with TPMG-related work operate to standards that are compatible with this Code.

TPMG may require visibility of relevant subcontracting arrangements where they materially affect service delivery, compliance, security, safety or client obligations.

---

13. Cooperation, Assurance and Corrective Action

TPMG may from time to time undertake supplier onboarding, due diligence, assurance, review, or risk-based checks proportionate to the nature of the relationship and service provided.

Suppliers are expected to:

- cooperate with reasonable information requests;
- provide accurate and timely responses;
- disclose material issues, risks or incidents relevant to TPMG or its clients;
- support reasonable remediation where issues are identified; and
- take timely corrective action where non-conformance or breaches are found.

Failure to cooperate, repeated non-compliance, serious misconduct, material legal breaches or conduct likely to harm TPMG's interests or reputation may result in review, suspension or termination of the business relationship, subject to contractual rights and obligations.

---

14. Reporting Concerns to TPMG

Suppliers should raise relevant concerns promptly where they become aware of:

- breaches of this Code;
- unethical or unlawful conduct;
- bribery, fraud or conflicts of interest;
- modern slavery or labour exploitation risks;
- serious health and safety failings;
- data protection or information security incidents;
- environmental breaches; or
- any issue likely to affect TPMG, its clients, its people, or its reputation.

Concerns may be raised through the TPMG contact points published on the website or through any designated reporting route communicated by TPMG.

---

15. Acceptance and Acknowledgement

TPMG may require suppliers to confirm, as part of onboarding or contractual engagement, that they have reviewed and understood this Supplier Code of Conduct and that they will comply with its principles and expectations.

Where required, suppliers may also be asked to confirm that:

- they have appropriate policies and controls relevant to their services and risk profile;
- they will inform TPMG of material breaches, incidents or issues;
- they will take timely corrective action where needed; and
- they will ensure relevant personnel and subcontractors understand and apply these standards.

If a contract imposes more specific or more restrictive obligations than this Code, the contractual requirements will take precedence to the extent of any inconsistency.

---

16. Contact

Questions about this Code or TPMG's supplier expectations may be directed to:

TPMG
A trading style of TPMG Group Ltd
Cardinal Point, Park Road, Rickmansworth, WD3 1RE
Tel: 020 7060 6228
General enquiries:admin@tpmg-group.com
Data Protection Officer:dpo@tpmg-group.com
Website:www.tpmg-group.com

---

17. Disclaimer

This Code is intended to provide a high-level public summary of TPMG's expectations of suppliers and third parties. It does not set out every contractual, legal, technical or operational requirement that may apply in a specific engagement, and TPMG may supplement, strengthen or update its requirements from time to time based on client needs, legal obligations, risk profile or operational circumstances.