

SUPPLIER CODE OF CONDUCT

Welcome

Marshall Fleet Solutions was founded in 1972 and is the UK's largest independent refrigeration (including installation), tail lift and commercial fleet service and support organization. The company is committed to acting ethically and with integrity in all our business dealings and relationships and implementing and enforcing appropriate and effective systems and controls.

Whether you are a customer, colleague, supplier, subcontractor or part of the local community, it is important to act appropriately and fairly in all our dealings together. This Supplier Code of Conduct sets out the principles and spirit under which we should work in association with our suppliers.

Upholding the highest standards of integrity and fairness demonstrates our individual and collective commitment to these values and should be what differentiates Marshall Fleet Solutions from our competitors.

We recognize that our success is tied to the performance and reputation of our suppliers and subcontractors. We value all our supplier/subcontractor relationships, and we treat all our suppliers/subcontractors with fairness and integrity, regardless of the value of the transaction or the longevity of the relationship.

We expect suppliers and their subcontractors to operate to the highest standards of business integrity in their relationship with Marshall Fleet Solutions and we expect them to share the principles expressed in this Supplier Code of Conduct.

INTRODUCTION

This Supplier Code of Conduct sets out minimum standards of behaviour and practices we require from our suppliers and subcontractors. We expect our suppliers and subcontractors to adhere to this Code, in addition to the provisions of any commercial terms agreed between Marshall Fleet Solutions and the supplier/subcontractor.

Purpose

The Code specifies the minimum standards of behaviour Marshall Fleet Solutions requires of our suppliers and subcontractors. The purpose of the Code is to formally communicate the Marshall Fleet Solutions requirements and expectations to the supply chain. Suppliers and subcontractors are required to adhere and comply with the principles set out in this document.

Content, Scope & Applicability

The Code is applicable to all suppliers and subcontractors who supply product or services related to Marshall Fleet Solutions contracts or purchase orders.

Marshall Fleet Solutions

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Marshall Thermo King Limited. Registered in England. Company No. 00759572.

Registered office: Marshall Thermo King Ltd T/A Marshall Fleet Solutions, The Airport, Cambridge, CB5 8RY

Suppliers and subcontractors are expected to cascade these principles to their own suppliers so as ensure alignment across the supply chain. This may involve the establishment of supply chain management processes that integrate the requirements of this Code.

CORPORATE RESPONSIBILITY AND SUSTAINABILITY (CR&S)

Priorities

Marshall Fleet Solutions has the following four key corporate responsibility and sustainability priorities.

- Demonstrating and maintaining the highest ethical standards to build trust with our customers, suppliers/subcontractors and employees
- Creating a work environment that attracts, retains and engages employees of all backgrounds
- Providing safe working environments, products and services for our employees, contractors, visitors, customers and end users
- Managing our environmental impacts to the local and global environment thus minimizing our impacts wherever practicable

Objectives

Marshall Fleet Solutions corporate responsibility and sustainability objectives for itself and its supply chain are:

- To be legally compliant with all laws and regulations in the jurisdictions in which it conducts its business, including accepted international laws
- To abide by all contractual requirements that have been agreed between both parties
- To ensure that human rights are not abused as a consequence of its operations and supply chain
- To achieve accident and incident free workplaces, products, and services
- To minimize environmental impacts and to use energy and natural resources efficiently wherever practicable

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RESPONSIBLE SUPPLY CHAIN MANAGEMENT APPROACH AT MARSHALL FLEET SOLUTIONS

The focus of Marshall Fleet Solutions approach to Responsible Supply Chain Management is to identify, prioritise and mitigate inherent significant risk in our supply chain in order to ensure that we have a sustainable supply to meet our customers' requirements.

Risks that are considered significant will be the subject of an appropriate due diligence assessment and the implementation of suitable and proportionate mitigation actions where necessary.

Actions could include, but are not limited to, supplier engagement, supplier education, supplier development or sourcing alternative suppliers/subcontractors.

THE CODE OF CONDUCT FOR SUPPLIERS

In addition to complying with all relevant laws and regulations, Marshall Fleet Solutions Suppliers' Code of Conduct is as follows:

Human Rights

We expect our suppliers and subcontractors to exercise due diligence over their supply chains to support the Human Rights principles. Our main priorities with respect to human rights are:

- Modern Slavery & Human Trafficking - We oppose modern slavery and human trafficking in all its forms and seek to identify and eradicate its occurrence within our own operations and within our supply chain wherever possible. We expect our suppliers and subcontractors to work likewise towards operations and supply chains that are free from slavery and human trafficking and to:
 - Communicate the requirements of the applicable legislation and of Marshall Fleet Solutions policy and our zero tolerance approach to all of its third parties and supply chain and hold their suppliers to the same high standards
 - Raise any concerns or suspicion of modern slavery or human trafficking in any parts of its business or supply chains to Marshall Fleet Solutions and appropriate authorities

Labour Standards

We expect our suppliers and subcontractors to:

- Provide workplaces that aim to be injury-free and incident-free for all employees and visitors
- Pay their workforces at least a statutory minimum wage
- Support the principles of freedom of employment choice and freedom of association

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- We do not tolerate child labour in our supply chain. Suppliers and subcontractors should avoid any sort of child labour in their business operations consistent with the International Labour Organization core labour standards, the United Nations Global Compact principles and the UK Modern Slavery Act 2015
- Provide a working environment that is free from bullying, harassment, intimidation or fear
- Ensure equal opportunities for all in employment without discrimination on grounds of race, religion, sex or sexual orientation

Hazardous Materials

We are committed to phasing out from our products, substances that are considered dangerous to human health and the environment in accordance with all applicable legislation and customer specifications. Where suitable alternatives are not available, we will seek to obtain legal authorisation for the ongoing safe and efficient use of existing substances and will work with industry partners to source less hazardous replacements over time. We at all times expect suppliers and subcontractors to provide all necessary information as we may request of them in order for us to meet our legal and customer requirements.

Ethics

Marshall Fleet Solutions has a zero tolerance approach to unethical behaviour, including but not limited to, fraud, bribery and corruption in any form. We comply with the spirit and requirements of the UK Bribery Act 2010.

We are committed to strict compliance with all laws and regulations which apply to our business activities in the UK and around the world.

We abide by anti-trust and competition laws, such as those which prohibit price-fixing and the boycotting of suppliers or customers, the fixing of market share, misrepresenting a competitor, or stealing trade secrets.

In parallel we expect our suppliers and subcontractors to have written policies prohibiting bribery, kickbacks, corruption and similar prohibited business practices.

Suppliers and subcontractors must train their employees, consultants, subcontractors and vendors on the company's rules and procedures related to ethical business practices.

It is accepted that hospitality and corporate gifts are part of day to day business in the commercial arena. Giving or receiving hospitality or promotional expenditure is acceptable if it is:

- Incidental to business related events
- Given and received in good faith
- Permitted under local laws and customs
- Given and received in accordance with this policy

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Sustainable Procurement

Marshall Fleet Solutions is committed to a policy of sustainable procurement in support of the UK Government and other customer policies.

Suppliers and subcontractors are expected to use natural resources (e.g. water, sources of energy, raw materials) in an economical way. Negative impacts on the environment and climate will be minimized or eliminated at their source or by practices such as the modification of production, maintenance and facility processes, material substitution, conservation, recycling and material reutilisation.

Suppliers and subcontractors shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.

Environmental Responsibility

Marshall Fleet Solutions believes that all economic activity should be undertaken in compliance with all applicable local environmental laws. This also incorporates laws and international treaties relating to (but not limited to) waste disposal, emissions, discharges and the handling of hazardous and toxic materials.

Suppliers and subcontractors must demonstrate that they have instituted an environmental management system able to ensure compliance with the requirements of local and international environmental regulations and can effectively identify and manage environmental risks directly applicable to the company.

Data Management

We always safeguard and respect the confidentiality of information and intellectual property of our supply chain partners.

Marshall Fleet Solutions business is dependent on its intellectual property which must be protected against disclosure, whether intentional or unintentional. Intellectual Property includes, but is not limited to, trademarks, copyright, patents, inventions, know-how, design, and trade secrets. Suppliers and subcontractors will be vetted to ensure they have the necessary authorisations and controls in place to receive and protect such information.

Where appropriate, suppliers and subcontractors will be expected to sign up to legally binding Non-Disclosure Agreements with regard to information obtained as a result of working with Marshall Fleet Solutions.

Data Protection

Suppliers and subcontractors shall comply with all applicable data protection laws and requirements (including the UK General Data Protection Regulations) when processing any personal data and shall ensure that measures are in place to ensure the security of said

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data. In addition, suppliers and partners shall have in place the means to delete personal data when its retention is no longer required.

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