



# Supplier Code of Conduct.

## All suppliers to Cornerstone must understand and agree to adhere to our supplier Code of Conduct

### 1 Foreword and purpose

At Cornerstone, we believe that acting ethically and responsibly is not only the right thing to do, but essential for our business.

As the UK's leading telecoms infrastructure company, Cornerstone has strong values and clear principles which underpin our desire to remain a successful and sustainable business. Importantly, this approach covers both our own business operations, but also our wider supply chain.

We have a responsibility to ensure that the third parties we choose to do business with positively embrace and reflect our corporate values. We seek to work with companies who share our ethical standards and values, and who will commit themselves to meeting the requirements of relevant legislation and of our Supplier Code of Conduct.

We are committed to establishing mutually beneficial relations with our suppliers and business partners to raise standards, drive sustainable practices and create shared value for all. We conduct our operations with integrity and in accordance with the principles of fair competition. We strive only to do business with organisations who uphold similar business principles.

#### Our Vision

**Continue to be the leading UK mobile infrastructure services company.**

#### Our Mission

**To be famous for excellence in delivery, embracing transformation with our people and our customers at its heart.**

#### Our Values

- **Delivering Excellence** - Combining diligence with passion and expertise, we strive to surpass the high standards that our customers expect and which we set for ourselves.
- **Sharper Solutions** - As a sharp thinking and dynamic team, we are innovative and proactive. Finding solutions for tomorrow, today.
- **Stronger Connections** - Through a stimulating and conducive work environment we work as a team, developing effective and lasting relationships with our customers, suppliers, landlords and communities.
- **Inspiring Transformation** - Our culture inspires transformation, and we aim to be forward thinking and future-focused; this in turn motivates our partners and ourselves to strive to do more.

#### Purpose of the Code

The Cornerstone Supplier Code of Conduct specifies the minimum standards of behaviour we expect of our approved suppliers. The purpose of the Code is to formally communicate these requirements and expectations to our supply chain which are driven by - and fully aligned to - our values.

Cornerstone will always ensure that our expectations are relevant and proportionate to both the size of your organisation and the products and/or services you provide. We hugely value and depend on our suppliers as an extension of our capability.

Cornerstone and its employees are committed to developing our supplier relationships and building trust by:

- Being open, non-discriminatory, and proportionate in all our dealings with you



- Respecting and honouring the contractual commitments we have made to you, including timely payments
- Welcoming collaboration to help nurture a working relationship based upon mutual benefit and a shared commitment to continuous improvement

We look forward to working with you.

**Pat Coxen**

Chief Executive Officer

May 2024



## 2 The Cornerstone Supplier Code of Conduct - Overview

Our Supplier Code of Conduct is underpinned by Cornerstone's core values and has **five main pillars** as outlined below, with each supported by a summary of the action and commitment that we expect of our suppliers:

### Five Pillars of the Code - Supplier Obligations Summary

- **Lawful and Ethical Dealings:** we expect our suppliers to avoid any conflict of interest in their business dealings, conducting their business ethically, with integrity and full transparency. Suppliers are expected to fully comply with all applicable laws and regulations including the payment of required taxes.
- **Environmental:** we expect our suppliers to support us in minimising the environmental impacts of your products and services, to comply with all applicable laws and regulatory standards and to strive for best practice. Suppliers should take opportunities to make a positive impact on their local community.
- **Health and Safety:** we expect our suppliers to provide a hygienic, safe, and secure environment for all those within their community, complying with all relevant laws. Suppliers to Cornerstone should take a proactive approach to the wellbeing of their workforce.
- **Employment Standards:** we expect our suppliers to adopt fair and ethical employment practices, pay the Living Wage, embrace diversity in the workplace and promote equal opportunities for all. Suppliers must take appropriate steps to prevent child labour and modern slavery within your supply chain, support the protection of human rights and comply with applicable employment laws.
- **Proprietary Information:** where applicable, we expect our suppliers to manage, use and secure any data received from Cornerstone in a way that complies with the law and maintains integrity and reputation. Data should never be used for personal or commercial gain. Suppliers must have proportionate business continuity capability in place, and comply with our information, physical, personnel and cyber security requirements and standards.

## 3 The Cornerstone Supplier Code of Conduct – Detail

### 3.1 Lawful and Ethical Dealing

Suppliers to Cornerstone are expected to comply fully with all applicable legislation, including any trade embargoes or sanctions on the organisations or individuals with whom the Supplier engages. We expect our suppliers to comply with both the letter and the spirit of the law.

Cornerstone expects our suppliers to pay their taxes in accordance with the law. Cornerstone will not tolerate the facilitation of tax evasion within our supply chains, and we expect our suppliers to put in place reasonable prevention measures to ensure that they, and any persons associated with them, do not engage in tax evasion or the facilitation of tax evasion.

Suppliers to Cornerstone must not offer gifts or favours to Cornerstone's employees that may be perceived as an attempt to influence business decisions. All suppliers must conduct their business to a high ethical standard and comply with relevant legislation on bribery, corruption and prohibited business practice, including the UK Bribery Act 2010 and the Criminal Finance Act 2017.

### 3.2 Environmental

At Cornerstone we are committed to the reduction of carbon and all greenhouse gas emissions with a Net Zero target by 2040. We seek to utilise natural resources efficiently and preventing pollution in ways that ensure the long-term sustainability of the business whilst minimising our impact on the environment.



We expect our suppliers to actively support Cornerstone's environmental goals with clear policies that align with both best practice and continual improvement, including the following:

- Complying with all applicable current and future environmental laws, regulations, and standards.
- Proactively adopt industry best practice for the responsible sourcing of products and materials.
- Seeking to reduce negative environmental impacts including the prevention of pollution and providing visibility of progress towards such commitments. We expect our suppliers to encourage the use of environmentally friendly technologies and practices throughout their supply chain.
- Suppliers are encouraged to implement an environmental management system, and we would particularly value those who are working towards (or have) a management system such as (or similar) to ISO 14001.

### 3.3 Health and Safety

Cornerstone's suppliers will make proper provision for the health, safety and welfare of their employees, visitors, contractors, and those in the community who may be affected by their activities. A safe and healthy working environment should be provided, and occupational health and safety best practice promoted taking full consideration of any identified hazards and industry knowledge.

Cornerstone expects complete adherence to any applicable local laws and regulations. Suppliers are encouraged to implement a health and safety management system and we would particularly value accreditation to the Occupational Health and Safety Assessment Standard (OHSAS) 18001, or similar.

### 3.4 Employment Standards

Suppliers to Cornerstone are expected to actively manage their downstream supply chain in all of the fundamental areas outlined below:

#### 3.4.1 Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour as well as human trafficking. All of these have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to ensuring there is transparency in our own business and supply chain in our approach to tackling modern slavery, consistent with the UK Modern Slavery Act 2015. We expect the same high standards from all of our suppliers, contractors, and other business partners. We impose a condition within our contracting process forbidding the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We fully expect that our suppliers will apply the same high standards to their own organisations and supply chain.

#### 3.4.2 Child Labour

The use of child labour or practices that inhibit the development of children in any form, is strictly prohibited. Suppliers must comply with all child labour laws and should not employ anyone under the age of 15, or where it is higher, the mandatory school leaving age in the local country. If a supplier is discovered to be employing young workers Cornerstone will seek to withdraw from the contract immediately.

#### 3.4.3 Diversity and Equality

Suppliers should aim to provide equality of opportunity and treatment regardless of race, colour, gender, gender identity or expression, religion, nationality, sexual orientation, maternity, age, disability, or political affiliations.



Suppliers are expected to support equal pay for work of equal value.

Suppliers must oppose discrimination or intimidation towards employees including all forms or threats of physical and psychological abuse, and promote work free from harassment, victimisation or any other form of inappropriate behaviour or abuse on any grounds.

Suppliers should wherever possible work with diverse businesses and ensure inclusive sourcing activities and decisions with regard to supplier selection.

#### **3.4.4 Pay and Benefits**

As a minimum, Cornerstone expects suppliers to comply with all national regulations on pay and benefits. These should be sufficient to meet basic needs of workers and families. They must be compensated at a minimum in line with local laws for overtime hours worked.

#### **3.4.5 Working Hours**

Cornerstone's suppliers are expected to comply with national regulations on working hours. Employees should have annual leave provision and be permitted at least one non-working day per seven days as a minimum.

#### **3.4.6 Freedom of Association and Collective Bargaining**

Suppliers shall freely allow workers to associate with others, form, and join (or refrain from joining) organisations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment. In the absence of formal representation, suppliers shall ensure that workers have a mechanism to report grievances and that facilitates open communication between management and workers.

### **3.5 Proprietary Information**

Any personal data you receive through business dealings with Cornerstone must only be used for the agreed purpose. Security of such personal data is paramount and as such personal data should be kept securely, protected from unauthorised access or disclosure, and retained only for as long as is necessary to provide the services. You are required to comply with relevant Data Protection legislation and best practice guidance (as amended and updated from time to time). Specific data protection and information security obligations may be included in your contract with us, which you must strictly comply with. Suppliers are encouraged to implement strict Information Security protocols, and we would particularly value those who are working towards (or have) a management system such as (or similar) to ISO 27001.

Other supplier certifications that Cornerstone would particularly value relate to:

- ISO 9001 the international standard that specifies requirements for a quality management system (QMS)
- ISO 22301 the international standard for Business Continuity Management (BCM)

## **4 Communication of the Code**

We expect our suppliers to make the Cornerstone Supplier Code of Conduct readily available to their own employees and contractors to ensure all relevant personnel understand and support the values of our organisation. Suppliers should comply with this code and cascade the principles throughout their own supply chain. Cornerstone is open to working collaboratively to ensure the Code is comprehensively implemented and adhered to.



## 5 Consequences of Supplier Breach of the Code

Cornerstone’s goal is to drive excellence throughout our own organisation, and to positively support and influence the development of our supply chain. We strive only to do business with suppliers who share our values.

We are committed to supporting our suppliers and working together to improve outcomes for all. We welcome open, honest discussions with suppliers who feel they might not be able to fully adhere to the Code so we can jointly explore potential solutions to the challenges.

Where there is a failure to comply with these standards, Cornerstone will endeavour to resolve the potential issue by working closely with the supplier. If a supplier continually breaches this Code or refuses to comply, we will re-evaluate our business relationship and consider termination in line with existing contractual provisions.

A breach of an applicable law will result in termination as a Cornerstone supplier and a potential referral of the matter to local authorities.

## 6 Report Suspected Violations of the Code

If you see or suspect wrongdoing, you may report your concerns in confidence to the Head of Procurement in Cornerstone via the following email address: [SCM@Cornerstone.network](mailto:SCM@Cornerstone.network)

## 7 Updates to the Code

Cornerstone will review our Supplier Code of Conduct on an annual basis. We may publish and notify all interested parties of replacement or revised versions to reflect developments in the business, or changes to legislation.

### Document Currency

Title	Date	Version
Head of Procurement	May 2024	1.3

