

NT Killingley Ltd

Supplier Code of Conduct



Date January 2026 | Version 0

Introduction

This Supplier Code of Conduct outlines the standards we expect all suppliers to uphold in relation to health and safety, legal compliance, labour practices, working conditions, and ethical business conduct. NT Killingley Ltd is committed to conducting every aspect of its business with openness, integrity, and honesty, while respecting the rights and wellbeing of our employees, customers, and all third parties.

Our suppliers play an integral role in helping us achieve and maintain these standards. We therefore expect our suppliers to demonstrate the same commitment to high ethical standards, social responsibility, and environmental stewardship in all aspects of their operations.

Scope

This Supplier Code of Conduct applies to all suppliers and partners who provide materials, products, or services to NT Killingley Ltd. The term “suppliers” within this document includes all subcontractors, service providers, agents, intermediaries, and consultants acting on our behalf. We also expect our suppliers to promote and apply these principles throughout their own supply chains to ensure consistent ethical and responsible practices.

Health & Safety

At NT Killingley Ltd, the health, safety, and wellbeing of everyone affected by our work is our highest priority. We believe that strong health and safety performance is fundamental to the wellbeing of our people, the success of our projects, and the reputation of our business. We expect all suppliers to take all reasonable steps to prevent accidents, injuries, and work-related ill health and share our commitment to maintaining safe and healthy workplaces, in full compliance with UK legislation and our company standards.

What we expect from our suppliers –

- Comply fully with all relevant health and safety legislation, regulations, and industry standards, including the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 and the Construction (Design and Management) Regulations 2015 (CDM).
- All suppliers are required to work in accordance with NT Killingley Ltd SHEQ policy.
- Maintain effective health and safety management systems, policies, and procedures that identify, assess, and control workplace risks.
- Provide all workers with the necessary training, information, equipment, and supervision to perform their duties safely and competently.
- Ensure that plant, equipment, and materials are maintained in a safe condition and used only by authorised, trained personnel.

- Promote a positive safety culture where everyone is encouraged to report hazards, near misses, or unsafe conditions without fear of reprisal.
- Take immediate and appropriate action to investigate and correct any safety incidents, and share lessons learned to prevent recurrence.
- Recognise the importance of mental health and wellbeing as part of overall safety, supporting a culture of care, respect, and support in the workplace.

Legal Requirements and Business Ethics

NT Killingley Ltd is committed to conducting all aspects of its business ethically and in full compliance with the law. The actions and behaviour of our suppliers are vital to upholding these standards. We therefore expect all suppliers to operate with the same level of integrity and in alignment with this Supplier Code of Conduct, including adherence to any provisions that set a higher standard than, but do not conflict with, applicable legal requirements.

Anti-bribery & Corruption

NT Killingley Ltd takes a zero-tolerance approach to all forms of bribery and corruption. We are committed to conducting our business professionally, fairly, and with honesty and integrity at all times. We expect our suppliers to uphold the same principles and maintain a zero-tolerance stance toward any act of bribery or corruption.

What we expect from our suppliers –

- Always act with honesty, integrity, and in full compliance with this policy and applicable anti-bribery legislation (including the UK Bribery Act 2010). Not to solicit (or attempt to solicit) business or favour by offering a bribe or inducement.
- Never offer, promise, give, request, or accept any bribe, facilitation payment, or other improper inducement intended to obtain or retain business or influence a decision.
- Actively refuse any offer of a bribe or inducement to avoid any misunderstanding or perceived conflict of interest.
- Promptly report any actual or suspected breach of this policy to NT Killingley Ltd.

Anti-competition

NT Killingley Ltd supports free and open competition in all markets in which we operate. We are committed to fair business practices and expect our suppliers to uphold the same high standards of integrity and compliance.

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What we expect from our suppliers –

- Conduct business fairly and in full compliance with all applicable competition and antitrust laws and regulations.
- Refrain from any form of anti-competitive behaviour, including price fixing, market sharing, bid rigging, or any other practice that restricts fair competition.

Conflict of Interest

Conflicts of interest must be carefully managed, as all parties have a responsibility to avoid any interests, activities, or relationships that could compromise or appear to compromise sound judgement, objectivity, or integrity in performing their duties.

What we expect from our suppliers –

- To identify and implement appropriate measures to prevent or mitigate any actual or perceived conflicts of interest that may arise in connection with work undertaken for NT Killingley Ltd.
- Suppliers must promptly disclose any actual or potential conflicts of interest as soon as they are identified.
- Disclose in advance any personal or financial relationships with employees, representatives, or associates of NT Killingley Ltd that could create, or be perceived to create, a conflict of interest.

Confidential Privacy & Intellectual Property

NT Killingley Ltd is committed to treating all confidential, personal, and intellectual property information with the highest standards of integrity and respect. Any information shared with us will be handled securely and in confidence, and we expect our suppliers to uphold the same level of care and professionalism.

What we expect from our suppliers –

- Suppliers must take all reasonable measures to protect NT Killingley Ltd.'s confidential information, as well as that of our customers, clients, and stakeholders, from unauthorised access, disclosure, or misuse.
- Suppliers must Safeguard the privacy and intellectual property rights of all employees, business partners, and associates.
- To ensure that any collection, storage, or use of personal data complies fully with the UK General Data Protection Regulation (GDPR) and all other applicable privacy laws.

Labor Practices and Human Rights

NT Killingley Ltd takes human rights seriously and is committed to upholding the rights and dignity of every individual involved in its operations. We expect all suppliers to demonstrate the same commitment by respecting the rights, wellbeing, and fair treatment of their own employees and those within their wider supply chains. This includes providing safe working conditions, fair pay, equal opportunities, and ensuring that all workers are treated with dignity, respect, and without discrimination or exploitation.

Modern Slavery, Human Trafficking

NT Killingley Ltd has a zero-tolerance policy towards any form of forced labour, human trafficking, child labour, or exploitation. We expect our suppliers to uphold the same commitment and to actively prevent, identify, and address such practices within their own operations and supply chains.

What we expect from our suppliers –

- Ensure compliance with all applicable labour and human rights laws, including the UK Modern Slavery Act 2015.
- Prohibit the use of forced, bonded, or child labour in any form. Workers must have the freedom to leave employment at any time, subject to reasonable notice.
- Ensure that workers are not required to pay recruitment or hiring fees, and that no identity documents or valuables are withheld by the employer.
- Provide fair wages, reasonable working hours, and conditions that promote health, safety, and wellbeing.
- Implement effective due diligence processes to identify, prevent, and mitigate human rights risks within their own supply chains.

Working Hours Wages and Benefits

At NT Killingley Ltd, we believe that everyone should be rewarded fairly for their level of skill, performance and overall contribution to the business and that they are not required to work excessive hours to provide an adequate standard of living for themselves and their families.

What we expect from our suppliers –

- Suppliers should clearly communicate employment conditions to its workers in a clear and consistent manner and if necessary, in a language/ format the worker understands.
- All workers should be fairly and reasonably paid in accordance with wage laws relating to national minimum wages, overtime hours and legally.

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Bullying, Harassment and Discrimination

NT Killingley Ltd is committed to providing a workplace where everyone is treated with dignity, respect, and fairness. We do not tolerate any form of bullying, harassment, or discrimination, and we expect our suppliers to uphold the same standards. Every worker deserves to work in an environment that is free from intimidation, hostility, or abuse, where individuals can contribute and thrive based on their skills and merit.

What we expect from our suppliers –

- Prohibit all forms of bullying, harassment, and discrimination on any grounds, in line with the Equality Act 2010.
- Promote a culture of mutual respect and inclusion, ensuring all workers are treated fairly and without prejudice.
- Ensure that any complaints or allegations of bullying, harassment, or discrimination are taken seriously, investigated promptly, and addressed appropriately.
- Provide training and clear guidance to employees and managers on expected workplace behaviours and how to report and manage concerns.

Freedom of Association

NT Killingley Ltd is committed to respecting the freedom of association and believe that our success depends on mutual trust, collaboration, and respect for one another. This includes recognising the right of individuals to join a trade/labour union of their choice or the right to not join one at all.

What we expect from our suppliers –

- Recognise and respect the rights of workers to freely decide whether to be represented by a trade union and to participate in lawful trade union activities without fear of intimidation, reprisal, or discrimination.
- Encourage open communication and constructive engagement between workers and management to ensure that workers' rights, concerns, and views are listened to, respected, and addressed appropriately.

Environment & Sustainability

NT Killingley Ltd recognises its responsibility to protect the environment and promote sustainable practices across all areas of its operations. We are committed to minimising our environmental impact and contributing to a more sustainable construction industry. We expect our suppliers to share this commitment by managing their operations in an environmentally responsible manner and by continually seeking ways to reduce their impact on the planet.

What we expect from our suppliers –

- Comply with all applicable environmental laws, regulations, and standards, including those relating to waste management, emissions, pollution prevention, and resource use.
- Implement practices that reduce environmental impact, including energy efficiency, responsible water use, and waste reduction through recycling and reuse.
- Source materials responsibly, giving preference to sustainable and ethically produced products.
- Take active steps to prevent pollution and minimise greenhouse gas emissions throughout operations and transportation.
- Continuously monitor and improve environmental performance through innovation, training, and engagement with employees and supply chain partners.

Quality & Continuous Improvement

NT Killingley Ltd is committed to delivering high-quality products and services that meet or exceed customer expectations. We believe that quality, reliability, and continuous improvement are essential to building trust and maintaining long-term relationships. We expect our suppliers to adopt the same commitment to quality management, accountability, and ongoing improvement in everything they do.

What we expect from our suppliers –

- Maintain robust quality management systems to ensure consistent standards of performance and delivery.
- Supply products, materials, and services that meet agreed specifications, industry standards, and all applicable legal and regulatory requirements.
- Ensure that any non-conformances or defects are promptly reported and corrective actions are implemented to prevent recurrence.
- Encourage innovation and the use of best practices to improve efficiency, reduce waste, and enhance value across the supply chain.
- Promote a culture of learning and development by regularly reviewing processes, investing in skills, and seeking opportunities for continuous improvement.
- Collaborate openly with NT Killingley Ltd to share feedback, insights, and ideas that contribute to mutual growth and long-term success.

Community & Social Impact

NT Killingley Ltd recognises the importance of making a positive contribution to the communities in which we live and work. We believe that strong community relationships and responsible social practices strengthen both our business and society. We expect our suppliers to function as responsible partners, supporting sustainable development and leaving a lasting, positive legacy through their operations and interactions.

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What we expect from our suppliers –

- Conduct business in a manner that respects local communities, minimising disruption and promoting positive engagement.
- Support local employment and skills development wherever possible, including through apprenticeships, training, and the use of local labour and suppliers.
- Contribute to social value by supporting community initiatives, charitable causes, or environmental improvements that enhance local wellbeing.
- Treat all stakeholders with respect and function as ambassadors for ethical, responsible, and community-minded practices.
- Consider the broader social and economic impact of their activities and work collaboratively to create shared value across the supply chain.

Monitoring, Auditing & Enforcement

NT Killingley Ltd is committed to ensuring that the standards outlined in this Supplier Code of Conduct are upheld across our entire supply chain. Compliance with this Code forms part of our business relationship with all suppliers. We reserve the right to monitor and evaluate supplier performance to verify adherence to these standards and to promote a culture of continuous improvement and accountability.

What we expect from our suppliers –

- Maintain accurate and transparent records that demonstrate compliance with this Supplier Code of Conduct and any related legal or contractual obligations.
- Cooperate fully with any audits, assessments, or inspections conducted by NT Killingley Ltd or its authorised representatives.
- Provide access to relevant documentation, facilities, and personnel when requested to verify compliance.
- Take prompt and effective corrective action to address any identified non-compliance or areas for improvement.
- Understand that serious or repeated breaches of this Code, or a refusal to cooperate with monitoring processes, may result in suspension or termination of the business relationship.
- Encourage their own supply chain partners to comply with equivalent standards and support transparent reporting and remediation where issues arise.

Reporting Concerns

NT Killingley Ltd is committed to maintaining an open and transparent culture where ethical conduct is upheld, and concerns can be raised without fear of retaliation. We believe that identifying and addressing issues early helps protect individuals, our business, and our supply chain. We expect our suppliers to share this commitment and to provide their workers with safe and confidential channels for reporting concerns.

What we expect from our suppliers –

- Establish and maintain procedures that enable employees and other stakeholders to raise concerns about suspected misconduct, illegal activity, or breaches of this Supplier Code of Conduct in good faith and without fear of reprisal.
- Ensure that all reports are treated seriously, investigated promptly, and handled with fairness and confidentiality.
- Encourage a culture of openness and integrity, where workers feel supported to speak up about concerns related to ethics, safety, human rights, or any other aspect of this Code.
- Promptly report to NT Killingley Ltd any significant breaches, violations, or incidents that may affect compliance with this Code or damage trust in the supply relationship.
- Take appropriate corrective action where investigations identify wrongdoing or non-compliance.

Acknowledgement and Commitment

NT Killingley Ltd values strong, transparent, and ethical relationships with all its suppliers and partners. This Supplier Code of Conduct represents our shared commitment to responsible business practices, integrity, and continuous improvement across all areas of our operations and supply chains.

By agreeing to supply goods or services to NT Killingley Ltd, each supplier acknowledges that they have read, understood, and agree to comply with the standards set out in this Code. Suppliers also commit to communicating these principles to their own employees, subcontractors, and supply chain partners, ensuring that the same high standards are upheld throughout their operations.

NT Killingley Ltd reserves the right to review, update, or amend this Supplier Code of Conduct from time to time to reflect evolving legal, ethical, and sustainability standards. We look forward to working collaboratively with our suppliers to achieve our shared goals of fairness, quality, and responsible growth.

Signed:

A handwritten signature in black ink, appearing to read "Gareth Dillon".

Gareth Dillon
Managing Director