









Supplier Code of Conduct

The Commonwealth War Graves Commission (CWGC) is entrusted with the great honour of caring for the graves, memorials, records, and stories of those from the Commonwealth who died in service, or as a result of conflict in the two World Wars.

We are an organisation of abiding care, which is shown each day, in all that we do, in who we are, and in how we work. Our own CARE Values reflect and set out our culture as shared expectations, behaviours, and standards and we have the same expectations of those who work with, and for us.

By entering a relationship with CWGC, we require you to observe and comply with all applicable laws and regulations along with the following 8 principles of legal and ethical conduct:

<div style="display: flex; align-items: center;">  <div style="margin-left: 10px;"> <p>1. You will have in place effective anti-bribery and corruption measures.</p> </div> </div> <p>This means that you, and those who work for you, will:</p> <ul style="list-style-type: none"> • not pay, or receive, bribes • not make “grease payments” (e.g., to speed up or get around a government service or control) • comply with all applicable bribery laws and UK bribery law 	<div style="display: flex; align-items: center;">  <div style="margin-left: 10px;"> <p>2. You will avoid conflicts of interest.</p> </div> </div> <p>This means that you, and those who work for you, will:</p> <ul style="list-style-type: none"> • avoid financial or personal interest in anything which makes it difficult for you to always work in the best interests of CWGC • declare any personal or financial interests you have which may impact CWGC
<div style="display: flex; align-items: center;">  <div style="margin-left: 10px;"> <p>3. You will not engage in, or tolerate, any form of slavery or human trafficking, or other exploitation of human rights.</p> </div> </div> <p>This means that you, and those who work for you, will:</p> <ul style="list-style-type: none"> • not force labour by threat or use child labour • not use slaves for any purpose • not control the movement of your employees • not traffic humans or use persons who have been trafficked in your operation • pay fairly and not withhold wages • have employment contracts in place • comply with human rights laws 	<div style="display: flex; align-items: center;">  <div style="margin-left: 10px;"> <p>4. You will treat those who work for, or with you, equally, and with dignity and respect.</p> </div> </div> <p>This means that you, and those who work for you, will:</p> <ul style="list-style-type: none"> • not bully, harass or intimidate your employees • not discriminate • provide fair and equal treatment regardless of age, race, colour, nationality, religion/belief, gender, marital/partner status, pregnancy/maternity, sex or sexual orientation • meet relevant equality and anti-discrimination laws

 <p>5. You will provide a safe and healthy working environment.</p> <p>This means that you, and those who work for you, will:</p> <ul style="list-style-type: none"> • be skilled and do necessary training • make sure work equipment is safe, properly maintained, compliant, safely used and stored • comply with health and safety guidance provided by CWGC • comply with relevant health and safety law 	 <p>6. You will protect the environment from harm.</p> <p>This means that you, and those who work for you, will:</p> <ul style="list-style-type: none"> • comply with all environmental laws and strive to meet local best practice standards • minimise the environmental impact of your operations and the goods and/or services you, and your third parties, provide to CWGC • manage waste legally
 <p>7. You will ensure that no products or materials are sourced through illegal or unethical practices.</p> <p>This means that you, and those who work for you, will:</p> <ul style="list-style-type: none"> • not supply to CWGC any materials or products sourced through illegal or unethical practices (and be able to prove this if asked) • not purchase any conflict minerals 	 <p>8. You will protect our intellectual property, data and confidential information from unauthorised access or use.</p> <p>This means that you, and those who work for you, will:</p> <ul style="list-style-type: none"> • keep CWGC data securely and confidentially • not share CWGC data without consent (including to your sub-contractors) • not wear CWGC branded clothing or do anything that may give the impression that you are a CWGC employee • Comply with applicable data protection laws • report any data or information security issues to CWGC immediately

We may ask you to provide information to evidence your compliance with these requirements at the outset and during the lifetime of our working relationship. We may not enter or may terminate a relationship with you if you do not, or cannot, comply with these requirements.

We encourage you to speak up about any issue, wrongdoing, or unethical conduct in any part of our operation or supply chain. Please email concerns to: concerns@cwgc.org.

If you have any questions or queries related to this Supplier Code of Conduct, please raise these with your CWGC contact or email the CWGC Compliance Team directly on compliance.ethics@cwgc.org.

Version Control

Document Name	Supplier Code of Conduct (Two Page)		
Version	1.0		
Document Owner	Date Effective	Date for Review	
General Counsel	01/12/2023	01/12/2025	