
Supplier Code of Conduct

31 December 2024

1. Introduction

- 1.1. Leeds Bradford Airport (**LBA**) is committed to the highest standards of integrity, ethics and responsible business practices.
- 1.2. This Supplier Code of Conduct (**Code**) reflects our commitment to our employees, clients and stakeholders, and the obligations expected from all of our suppliers, affiliates, consultants, contractors and agents (collectively, **Suppliers**).
- 1.3. Our purpose is to provide airport facilities and travel services to connect people with the world. The way we fulfil our purpose is important to a wide range of stakeholders, including our passengers, colleagues, airlines, and the local communities that we impact and serve. Our Suppliers play a critical role in how we fulfil our purpose. We are clear that we will manage and develop our business in a responsible and sustainable way, that recognises the needs of all our stakeholders and maintains the highest standards of safety and security.
- 1.4. We expect all of our Suppliers to act in a manner that upholds our reputation. Critically, our Suppliers should treat our colleagues and service partners with fairness and respect. We then expect our colleagues and service partners to treat our suppliers in the same way.
- 1.5. By entering into a business relationship with us, all Suppliers are deemed to have accepted the obligations set out in this Code and agree to comply with it in addition to any of their contractual and other obligations. We expect our Suppliers to encourage their suppliers to adhere to the standards in this Code, as part of fulfilling their contractual obligations. We also expect our Suppliers to maintain records to evidence their compliance with this Code as any breach of the obligations stipulated in this Code may be considered a material breach of contract by the Supplier. We reserve the right to audit any Supplier or their subcontractors to confirm the obligations set out in this Code are in force.

2. Compliance with laws and regulations

- 2.1. Suppliers must behave lawfully and ethically at all times. Suppliers must respect and comply with all applicable local and international laws, regulations and relevant industry codes when working with us and in the countries in which they operate.
- 2.2. Competition law applies to all organisations and seeks to preserve free, fair and effective competition between businesses for the protection of the consumer. LBA is fully committed to complying with competition law at all times and Suppliers must ensure they are also aware of and conduct themselves in accordance with competition law.

3. Financial records and payment

- 3.1. Suppliers must conduct business fairly, transparently and with integrity. Suppliers must maintain fair and accurate books and records, follow applicable invoicing and taxation requirements and comply with lawful and appropriate accounting practices.

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- 3.2. A Purchase Order (PO) will be issued upon agreement of terms between both parties. Suppliers are expected to comply with our requirements and not commence any type of work for LBA until instructed via a PO. Suppliers should submit invoice(s) as agreed by contractual terms. Suppliers must only commence work when they are in receipt of a valid Purchase Order (PO). Any work undertaken without a valid PO is done so at the Supplier's own risk. Invoices are to be emailed to invoices@lba.co.uk. Your invoice must clearly state a valid PO number and must be submitted in PDF format with only one invoice attached per email. Any invoices received without a valid PO number will be returned unprocessed.

4. **Confidentiality and security**

- 4.1. Suppliers must keep information relating to us strictly confidential and secure. Suppliers must never disclose such information to any third party without our prior written permission or without prior written notice to us (unless the giving of such notice is unlawful) when disclosure is required by law, regulation or a court order. All paper and electronic records must be kept secure, and security measures must be in place to prevent unauthorised access to computer systems containing our information or that of our clients. Supplier teams may only access documents and information for which such access has been granted.
- 4.2. Suppliers must have security policies and procedures in place to keep information confidential and secure, and all Supplier employees, workers and sub-contractors must be educated on such policies and made aware of the importance of confidentiality.

5. **Respecting human rights and treating people with respect**

- 5.1. Suppliers must demonstrate a commitment to respecting human rights and protecting the dignity of their employees, workers and sub-contractors. Modern slavery is a crime and a violation of human rights. It takes forms such as slavery, servitude, forced and compulsory labour and human trafficking. LBA will not tolerate discrimination, harassment, or victimisation of any form towards LBA employees, within the wider workplace or its supply chain.
- 5.2. Suppliers must comply with applicable employment and human rights legislation wherever they operate, including relevant child labour laws and minimum employment age limits. They must have zero tolerance of modern slavery and human trafficking and ensure that no form of modern slavery or human trafficking exists within their supply chain. This includes not engaging with any person or organisation suspected of being involved with or using any form of forced, bonded or compulsory labour.
- 5.3. Suppliers must also treat their employees and workers fairly and with respect meaning that, amongst other things, they make their employees and workers aware on what basis they are paid, ensure any overtime is voluntary and that any such overtime is remunerated adequately. All Suppliers' employees and workers should be employed on a voluntary basis and free to terminate their employment or engagement with reasonable notice and in line with applicable laws and regulations.
- 5.4. As respectful, equal opportunity employers, Suppliers must value diversity and protect the health, safety and wellbeing of their employees and workers. They must never discriminate, at any stage of employment, against any individual on the basis of age, gender, gender identity, race, religion, national origin, sexual orientation, disability, or any other classification protected by applicable law. The protection offered by Suppliers must include the prohibition of abuse of any kind, including physical, verbal, sexual or emotional

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abuse or harassment, inhumane or degrading treatment, corporal punishment, threats, intimidation or any other form of harassment or offensive behaviour. Such protections should not only apply to the physical workplace but must include protecting individuals from harassment which occurs in the course of business, for example when employees or workers are attending work-related trips, events or functions. Harassment or bullying of any kind will not be tolerated at LBA, and Suppliers must comply and act in accordance with LBA's Anti-Harassment & Anti-Bullying Policy.

6. **Health and safety**

- 6.1. Health and safety is of paramount importance at LBA. Suppliers' compliance with health and safety laws and regulations is critical and risks to health and safety must be managed with suitable processes and procedures to ensure that the potential for harm is as low as reasonably practicable.
- 6.2. LBA believes in a zero-harm approach. As such we constantly challenge ourselves, our suppliers, service partners and other third parties to share in the pursuit of our zero-harm belief.
- 6.3. Suppliers must comply with all relevant local health and safety laws and regulations and generally offer a work environment that is safe, conducive to good health, and helps prevent accidents, injuries and work-related illnesses. We expect our Suppliers to demonstrate leadership in health and safety, complying with our requirements, following specific rules in place at different locations and developing their own strategies and policies to mitigate health and safety risks.

7. **Anti-bribery, corruption and facilitation payments**

- 7.1. We prohibit any form of bribery and corruption in all business dealings, with both government and private sector parties. We have a zero-tolerance approach to bribery in any form, whether directly or through an agent, intermediary or any Supplier.
- 7.2. Suppliers must comply with all applicable anti-bribery and corruption laws and regulations. They must not offer, give, receive or request a bribe, whether directly or indirectly, and must take reasonable steps to prevent others (who are acting on their behalf) from doing so.
- 7.3. Suppliers must not offer or give an incentive of any kind to any public official which would cause them to improperly fulfil their function or would be viewed as corrupt activity. They must also implement and operate adequate procedures for employees and workers to comply with applicable anti-corruption laws and regulations.
- 7.4. Facilitation payments are small payments often described as 'commissions' or 'fees' to expedite or 'facilitate' a routine government process. Facilitation payments are bribes and must not be made by Suppliers or permitted by them to be made on our behalf.

8. **Gifts and hospitality**

- 8.1. Gifts and hospitality are sometimes a part of the way we do business. However, safeguards must be respected to ensure that gifts and hospitality offered or received are reasonable and do not cause anyone to act improperly.

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- 8.2. Suppliers may provide gifts, entertainment and hospitality to our employees if they serve a bona fide business purpose and are of appropriate value, timing and frequency. However, in accepting or providing such gifts and hospitality, Suppliers must comply with LBA's Business Gifts, Entertainment and Hospitality Policy. Suppliers must not provide any gifts and hospitality if they are unlawful, excessive, inappropriate or would cause or could be seen to cause a person to improperly provide a business advantage or perform their function or activities improperly or unlawfully.
- 8.3. Suppliers should never give or accept gifts in the form of cash, commissions, precious metals (including gold), lottery tickets or betting tokens, pre-paid charge cards, loans, shares in profit, securities or their equivalent.
9. **Tax evasion, fraud and money laundering**
- 9.1. Suppliers must adhere to all international laws, regulations and standards in respect tax evasion, fraud and money laundering.
10. **Social media and external communication**
- 10.1. When engaging in external communications, including social media, Suppliers are responsible for what is written and are encouraged to exercise good judgement and common sense. Suppliers should also ensure they have policies and procedures to ensure their employees are responsible in their engagement with social media when potentially communicating around their work, the Supplier's work and LBA. When wanting to create LBA related communications (e.g., press releases, social media posts, articles etc.) approval from LBA is required. Suppliers are also bound by and shall comply with LBA's external social media policy.
11. **Data protection**
- 11.1. The protection of personal data is of fundamental importance to us and data protection compliance is at the core of our business practices. Where we own or control personal data, we do so by adhering to the following data protection principles which provide that personal data must be:
- processed lawfully, fairly and in a transparent manner;
 - collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - adequate, relevant and limited to what is necessary;
 - accurate and, where necessary, kept up to date;
 - not kept for longer than is necessary;
 - kept safe and secure; and
 - transferred in accordance with the law.
- 11.2. Suppliers must also abide by all of these principles in relation to personal data that they provide to LBA and personal data that they control or own. Suppliers must train their staff, subcontractors and agents so that they too understand the importance of protecting personal data.

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- 11.3. Suppliers must maintain robust security policies, standards, practices and controls to protect against the internal and external threats, loss of confidentiality, integrity or availability of information that LBA uses to operate its business or handles on behalf of its customer. Suppliers must only use personal data we provide in accordance with our instructions and applicable legislation. Suppliers must not use, collect, disclose or otherwise process personal data we have provided without first seeking our approval. Suppliers must also only collect and process the personal data necessary to fulfil our agreed objectives, which must be relevant and not excessive.
- 11.4. Suppliers must not disclose any personal data we provide to any third-party processor unless that third party has appropriate security measures and a suitable data processing agreement has been put in place or as otherwise permitted by law.
12. **Environment and sustainability**
- 12.1. We are committed to implementing and maintaining environmentally friendly and sustainable business practices.
- 12.2. We expect our Suppliers to support our commitment by:
- recognising and adhering to LBA's Environmental Policy;
 - regularly assessing their environmental risks and opportunities in relation to their operations and manage those risks accordingly;
 - continuously improving their environmental performance, including the efficient use of energy, water and raw materials;
 - minimising waste by applying circular economy principles;
 - taking action to reduce their carbon footprint;
 - managing their business operations to protect the environment; and
 - ensuring compliance, as a minimum, with relevant environmental legislation, permits and other environmental requirements relevant to their sector.
13. **Conflicts of interest**
- 13.1. Conflicts of interest may occur when a transaction takes place between two parties who have a pre-existing relationship (known as a related party transaction) or when a party acting on our behalf including an employee, contractor or supplier has interests that could benefit from the knowledge gained or duties performed for us.
- 13.2. Conflicts of interest are not strictly prohibited, but if not appropriately reported in advance of work starting and managed, they may lead to decisions that are not in the best interests of our business.
- 13.3. We recognise the importance of avoiding, mitigating and managing such conflicts of interest. As such, Suppliers may never take advantage of personal relationships, personal investment or corporate opportunities available as a result of employment, nor engage in activities that conflict with the interests of LBA.
- 13.4. Suppliers must further make us aware of any actual or potential conflict of interest as soon as they identify them, so that they can be managed appropriately. Once a potential or actual conflict of interest is identified,

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the Supplier should work with their main LBA contact and, if appropriate, our Legal team to agree how to best manage such conflict.

14. Whistleblowing

- 14.1. Suppliers must raise any actual or potential concerns or suspicions of wrongdoing related to their engagement or relationship with us, or our other internal policies, where known. There are several ways to raise such matters, including with the Suppliers' LBA contact, members of the Human Resources and Legal teams, or by using the external whistleblowing hotline, Safecall.
- 14.2. The individual contacting Safecall should state that the concern relates to LBA. Reports can be made on Safecall's independent website at www.safecall.co.uk or by calling the toll-free number for the related country available on Safecall's website.

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