

Ethical Procurement & Supplier Code of Conduct

Version 1.0 · Effective June 2026 · Reviewed annually

HARVTECH LTD ("HarvTech", "we", "us") expects the suppliers and subcontractors we work with to share our commitment to lawful, ethical and responsible business. This Code sets out the standards we apply when selecting and managing our supply chain, and the conduct we expect of those who supply to us.

1. Purpose and scope

This Code applies to all suppliers, subcontractors and partners providing goods or services to HARVTECH LTD. It establishes our expectations on legal compliance, labour and human rights, environmental responsibility and business ethics, and forms part of how we make purchasing decisions.

2. Compliance with laws

Suppliers must comply with all applicable local, national and international laws and regulations, including those relating to employment, health and safety, data protection, anti-bribery (including the UK Bribery Act 2010) and tax.

3. Fair labour practices

- Employment must be freely chosen; no forced, bonded or compulsory labour.
- No use of child labour; workers must meet the minimum legal working age.
- Fair wages that meet at least legal minimums, and lawful working hours.
- Safe and healthy working conditions, and freedom from discrimination and harassment.

4. Human rights & modern slavery

Suppliers must uphold internationally recognised human rights and take active steps to ensure that modern slavery, servitude and human trafficking do not occur in their own operations or supply chains, consistent with the Modern Slavery Act 2015. Suppliers should be able to demonstrate their approach on request and must report any concerns to us promptly.

5. Environmental responsibility

Suppliers are expected to manage and reduce their environmental impact, comply with environmental legislation, and support sustainability through responsible use of resources, energy and waste management — including responsible disposal and recycling of electronic equipment.

6. Business ethics & data protection

Suppliers must act with integrity, avoid bribery and corruption in all forms, manage conflicts of interest transparently, and protect any confidential or personal data they handle in line with UK GDPR and the Data Protection Act 2018.

7. Wider supply chain

We expect suppliers to apply equivalent standards to their own suppliers and subcontractors, so that these principles extend through the wider supply chain.

8. Oversight and review

HarvTech applies proportionate due diligence when selecting suppliers, favouring established and reputable providers, and reserves the right to ask suppliers to evidence their compliance with this Code. We will address any breach constructively and, where necessary, by ending the relationship. This Code is reviewed at least annually and is approved by the director of HARVTECH LTD.

Alex Harvey

Director, HARVTECH LTD · June 2026