Supplier Code of Conduct

June 2025

About us

Three is active in the Information and Communications sector and provides mobile telecommunications and data services to consumers, businesses and the wholesale market in the UK. Three launched in 2003 as the first 3G only network in the UK.

Three is a connectivity company that connects people to people, people to things and things to things with over 10.9 million customers. The network of Three today covers 99% of the UK population and carries 34% of the UKs mobile data traffic.

Three employs more than 4,800 people across our offices in Reading, Glasgow and our 297 retail stores.

Like all businesses in the UK, our operations are governed by a wide range of legislation and regulation. As a mobile network operator, we also adhere to specific communications sector requirements.

As a responsible business with suppliers and representatives the world over, we accept that we have a duty to trade responsibly. We therefore want to ensure that those people with whom we deal and in particular our suppliers and our representatives live up to our values and standards and share that responsibility.

Committed to better

Better connectivity, responsibly.

Our Three commitments

We're committed to better: Better connectivity, responsibly. We're focused on some key areas that we think will help us to conscientiously deliver better connectivity, every day, for every customer. Our framework of principles covers inclusion, environment, and the community.

Three's values

Our values define the attitudes and behaviours that will help us achieve our vision of better connectivity, every day, for every customer. They are the things that we value and how we get things done to drive our success.

We focus on the customer

We go beyond the expected

We work as one team

We take responsibility

We appreciate one another

Applicability

Three expects its suppliers to have the same, or more stringent, conduct expectations of its own employees, sub-contractors and supply chain, or, Three's own principles as outlined in this Code of Conduct should be extended for this purpose.

You will ensure your Associated Persons (e.g. agents or sub-contractors) are aware of and comply with this Code of Conduct (or your own where this is more stringent) and where applicable your own policies and procedures.

Supplier commitment

We want to work with Suppliers that feel the same about the way they operate. This Code of Conduct sets out the minimum standards of behaviour and practices we expect from our suppliers.

The Supplier agrees that it:

- shall continuously comply with the requirements of this Code of Conduct; and
- shall, where required, demonstrate such compliance.

We use the Code of Conduct's principles when engaging in new relationships and will monitor how suppliers live up to them throughout the life of the contract.

There may be additional requirements subject to the goods and services provided that we will clearly communicate as part of individual sourcing requirements.

We expect all our Suppliers to comply with laws, legislation, regulations, and directives relevant to its business.

In carrying out its relationship, supply or business with Three, the Supplier shall, in addition to complying with the standards set out in this Code of Conduct, comply with all applicable UK laws and regulations (and if applicable, the laws and regulations of any other jurisdiction where it, its representatives or supply chain operate) including but not limited to the laws and regulations relating to issues addressed in this Code of Conduct.

If there is any conflict between any applicable laws or regulations, the provisions of any agreement between the Supplier and Three and the provisions of this Code of Conduct, the Supplier shall meet the most stringent standard. If there is any conflict between the provisions of an agreement with Three and the provisions of this Code of Conduct, the Supplier meet the most stringent standard.

Compliance and ethics

Anti-bribery and corruption

Conducting business with a high level of integrity is important to Three, and Three does not tolerate any form of bribery or corruption, including embezzlement, money laundering, kickbacks, extortion, fraud, nepotism (family) or cronyism (friends).

What does it mean for you?

- You conduct business with integrity, and you do not tolerate any form of bribery or corruption.
- You never request, accept, pay, offer, or authorise bribes, either directly or indirectly, under any circumstances. This includes never seeking to improperly influence or bribe an employee, customer, or public official (including foreign public officials) or any other individual or entity.
- You do not offer or make facilitation payments, nor do you permit or allow others to offer or make such payments on your behalf. Facilitation payments are bribes – often small – paid to public officials to speed up non-discretionary bureaucratic processes and access services to which the payer is lawfully entitled.

- You will maintain and enforce your own anti-bribery policies and procedures, which are compliant with all applicable laws, statutes, codes and regulations relating to the prevention of bribery and corruption, including the UK Bribery Act 2010.
- You will comply with all applicable competition laws (including but not limited to the Competition Act 1998), including but not limited to those relating to teaming and information sharing with competitors, price fixing and rigging bids.

Conflicts of interest

Conflicts of Interest should be avoided but where they could arise, they are declared to Three as soon as possible.

What does this mean for you?

- Avoid Conflicts of Interest where possible but where an actual or perceived conflict is unavoidable its essential that Three is notified and the situation managed in an open and honest way.

Safeguarding information

Protecting our technology, intellectual property, data and commercially sensitive and confidential information from unauthorised access is critical to Three.

What does this mean for you?

- You must ensure that information received in relation to our people and our customers is kept confidential and secure.
- You must comply with all applicable laws, statutes, codes and regulations relating to the protection of personal data and data privacy.
- If any issues arise, you must report them to us as soon as possible.

Accurate business records

Maintaining accurate and up to date records is important. We don't tolerate any financial misconduct.

What does this mean for you?

- You must maintain accurate and complete business records.
- You must ensure you have the financial controls in place to manage financial risks

Tax evasion

We don't tolerate any form of financial misconduct including fraud, tax evasion and money laundering.

What does this mean for you?

- You must be alert to being asked to follow processes that are outside of the normal procedures.
- You must ensure all documents and invoices provide a true and accurate position as to what has been agreed

People

Human rights:

Everyone is entitled to basic rights and freedom, wherever they live and whoever they are. We expect our Suppliers to support recognised global human rights and fair working conditions for persons working on our projects, in our workplaces, and in our supply chain.

What does it mean for you?

- You do not allow any practice that would restrict free movement of employees. Such practices can include requiring that employee's hand over identification documents, passports or work permits as a condition of employment.
- You shall not engage in any slavery, servitude, forced or compulsory labour and/or human trafficking.

Modern slavery

No form of slavery, human trafficking or child, forced or compulsory labour is acceptable in Three or those that we work with or on our behalf.

Physical abuse or discipline, the threat of physical abuse, sexual or other forms of intimidation are prohibited.

We have zero tolerance for any form of slavery, human trafficking or child, forced or compulsory labour, including such practices as the unlawful or illegitimate withholding of wages.

What does it mean for you?

- Your workforce can thrive in their job without fear of any unjust treatment.
- You shall respect and promote the ILO's Fundamental Principles and Rights at Work:
  - the freedom of association and the effective recognition of the right to collective bargaining.
  - the elimination of forced or compulsory labour.
  - the abolition of child labour; and
  - the elimination of discrimination in respect of employment and occupation.
- You have zero tolerance for any form of human trafficking or child, forced or compulsory labour, including such practices as the unlawful or illegitimate withholding of wages, retention of workers' original identity documents, or requirements for workers to pay recruitment or any such other fees in relation to their employment.
- You must not employ anyone under the age of 15 or, below any higher minimum age specified by local law.
- Suppliers shall ensure that working hours are in compliance with local laws and ILO standards.

- Suppliers shall abide by any legislation governing minimum wage payments, and where none is available, ensure that salaries are commensurate with experience and industry standards
- You'll comply with all applicable anti-slavery and human trafficking laws, statutes, codes and regulations from time to time in force, including but not limited to the Modern Slavery Act 2015 in any part of your supply chain. You'll maintain and enforce your own anti-slavery and human trafficking policies and procedures to comply with such anti-slavery and human trafficking laws, statutes, codes and regulations from time to time in force.
- You have in place your own anti-slavery and human trafficking policies and procedures and confirm that your Associates are aware of, and comply with these.

Freedom of association and collective bargaining

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

What does it mean for you?

- You recognise and respect employees' right to freedom of association and collective bargaining, where permissible by law.

Health and safety:

Operating in a safe and healthy environment is critical to Three. Three has demonstrated this by the achievement of the ROSPA Gold health and safety award for numerous and consecutive years. We expect our contractors and suppliers to train their staff and have policies and procedures to ensure they are safe and don't effect the health and safety of our staff and customers.

What does this mean for you?

- You must as a minimum comply with all relevant health, safety, welfare and wellbeing legislation and guidance and be able to demonstrate this by providing where required documentation to Three.
- Ensure all staff and contractors are competent with relevant training and experience.
- You must ensure work equipment is safe, compliant with statutory requirements and safely used and stored.
- You will consider the health and safety of staff, contractors, members of the public and others affected by work activities ensuring they are safe and healthy at all times.
- You will have a process of assessing sub-contractors where used and supervising and monitoring contractors working on your behalf.
- You will have a robust system of accident reporting and investigation for all accidents, incidents and near misses including detailed accident investigation which will include underlying and root causes of the accidents and improvements thereafter

- The hierarchy of risk controls should be followed at all times to eliminate or reduce risks Where risk elimination cannot be achieved and PPE is selected as a control measure you must ensure the required PPE is worn and other protections are in place to ensure the safety of contractors, Three staff and customers.
- You will provide in a timely manner required information and safety signs to be posted in clear positions to make people aware of risks.
- You will follow all inductions, tool box talks or other such instructions and will comply with Three UK contractor management arrangements including permits to work.
- You will cooperate with Three UK on all health and safety matters and provide any information requested by Three UK and others in relation to health and safety.

Diversity and inclusion

We expect zero-tolerance towards bullying and harassment in any form. Everyone has the right to be treated with dignity and respect and not be subjected to any types of unacceptable behaviour or abuse including harassment, intimidation or bullying.

What does this mean for you?

- You do not tolerate disrespectful behaviour, bullying, discrimination, harassment, or unwanted sexual advances.
- You do not discriminate, and you provide equal treatment and opportunities for employees and job applicants.
- You embrace and promote an inclusive culture.
- You are an equal opportunities employer, where individuals are treated equally with dignity and respect and are recruited, employed, promoted, and paid based on merit and skills and not based on their age, disability, race, colour, nationality, ethnic or national origin, religion or belief, gender reassignment, marital or civil partner status, pregnancy or maternity, sex or sexual orientation.
- Comply with the obligations as set out in the 2010 Equality Act and/or all other applicable laws, statutes, codes and regulations relating to equality.
- Your products and services meet accessibility guidelines.

Whistleblowing

At Three, we operate a whistleblowing policy and process for all employees to be able to report any unethical behaviour.

What does this mean for you:

- You should provide a mechanism to allow concerns to be to be reported anonymously, including potential violations of this Code of Conduct, providing protection of identity and avoidance from retaliation. Where not feasible, we expect our suppliers to listen openly to raised concerns, act accordingly and protect the reporting person.

Environmental protection and climate change

We expect Supplier's to be committed to protecting the environment from harm and limiting the effect their business operations have on the local and global environment. We strive for a more sustainable future and want to work with suppliers who are also committed to take action on climate change, protect natural resources and promote a circular economy.

What does it mean for you?

- You will comply with all environmental legal requirements and support Three's energy and environmental reporting obligations where required.
- You will use reasonable endeavours to minimise the environmental impact of your operations and the goods and/or services provided.
- You will assess and manage climate related aspects and minimise their impact on climate change.
- You are committed to operating a robust environmental management system and supporting Three's environmental and carbon reduction strategy.
- You are committed to improving energy efficiency and increasing the use of energy from renewable sources.
- You are committed to using clean technology and scientific innovation to enable a reduction in environmental impact.
- You will be committed to promote environmental sustainability, protect natural resources and restore biodiversity.
- You will adopt the waste hierarchy principles and regularly review operations and arrangements to identify opportunities to further reduce waste streams.
- You will consider materials lifecycle sustainability and environmental factors during the procurement of equipment, goods and services or during the design, construction or refurbishment of workplace environments.
- You will support Three to adapt products and services to be more environmentally sustainable where applicable.
- You shall promote a circular economy, considering materials lifecycle sustainability and environmental factors during the procurement of equipment, goods or services.
- You shall support Three to adapt products and services to be more environmentally sustainable.

Responsible sourcing

No materials should be sourced through illegal or unethical practices. That the raw materials entering the supply chains are extracted, produced and processed in a responsible manner is a key condition for us as a responsible company. This also includes ethical labour practices.

What does it mean for you?

- That you can prove the source of your materials used in production is not from a conflict zone or used child labour to be extracted.
- That those responsible for extracting the materials were not subject to human or labour rights violations.
- You will not supply to any member of the Three Group any materials sourced through illegal or unethical practices, which includes any products, components or materials that contain conflict minerals.
- You shall maintain and enforce your own policies and procedures, to ensure you do not purchase any conflict minerals.
- Ensure your Associates are aware of your conflict minerals policies and procedures.

Community

Supporting our communities to help shape a better world

Empowering communities to get connected, and to make people's lives better is important to Three and important to for us to work with Suppliers that enable us to use our skills and knowledge to support communities in the UK and across the globe.

What does it mean for you?

- You shall seek opportunities to contribute to the communities that you operate in, helping to address social issues (such as unemployment, education, health and well-being), by making the most of its ability to provide financial, in-kind and/or skill-based support.
- Where opportunities arise, collaborate on opportunities to support community projects where there is a mutual understanding of the benefit that could arise with doing so.

Your commitment to Three's Code of Conduct

No Contract, no Pay

Three's policy is that no work should commence without a valid purchase order and formally agreed terms of business.

Compliance to the Code

The Supplier accepts and acknowledges that Three has the right to audit a Supplier's conduct against compliance with this Code of Conduct. The Suppliers shall keep records to demonstrate compliance and we may request access to such documents at any time.

The Supplier shall provide written confirmation to Three at least once per year that:

- It has appropriate controls in place to monitor its compliance with this Code of Conduct; and
- It is compliant with this Code of Conduct and is able to remain compliant for the duration of its relationship with Three.

The Form of confirmation required by this paragraph to be advised by Three from time to time.

The Supplier shall monitor its compliance with this Code of Conduct and shall report any breaches (actual or suspected) of this Code of Conduct as soon as possible to H3Gsuppliers@three.co.uk

Definitions

In this Code of Conduct any reference to laws, statutes, codes and regulations is a reference to it as amended, extended, re-enacted or consolidated from time to time and includes all statutory instruments or orders from time to time made pursuant to it.

- "Associated Persons" has the meaning given in the Bribery Act 2010.
- "Associate" means in respect of each party, any officer, director, employee, consultant, agent, direct or indirect beneficial owner or shareholder or any other party acting on behalf of such party.
- "Representative" means the Supplier's suppliers, vendors, agents and subcontractors who are involved in the Supplier's supply chain.
- "Supplier" means any company, partnership, or individual supplier that provides goods or services to Three and its Representatives.
- "Three" means Hutchison 3G UK Limited a company incorporated in England and Wales with registered number 03885486 whose registered office is at 450 Longwater Avenue, Green Park, Reading RG2 6GF.
- "ILO" means the International Labour Organisation.

When we say "Three", we mean Hutchison 3G UK Limited, trading as Three. Our registered number is 03885486 (England and Wales), and our registered office is at 450 Longwater Avenue, Green Park, Reading, Berkshire, RG2 6GF

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