

SUPPLIER CODE OF CONDUCT AND ETHICS POLICY

Document Control

Policy Owner	Version No.	Date	Next Review
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Overview

At PGL Beyond we are committed to conducting our business with the highest ethical standards and legal requirements wherever we operate. We, in turn, expect our suppliers and partners to uphold the same standards and values. Our six core values of quality, safety, teamwork, respect, inclusivity and fun are deeply embedded in every part of our business and we always look to partner with suppliers that share a similar ethos and values wherever possible.

This Supplier Code of Conduct and Ethics Policy outlines our expectations of PGL Beyond's suppliers. All suppliers and business partners of PGL Beyond and its network of brands - including NST, European Study Tours, StudyLink and PGL Travel - are requested to comply with the below, in addition to complying with all wider applicable laws, regulations, codes and statutory requirements. By signing this Code of Conduct, you agree to adhere to its guidelines on behalf of your brands. We recognise that you cannot sign on behalf of any separate legal entities within your organisation.

We will work with any suppliers to address and provide further support where there are non-compliances with or breaches of this Supplier Code of Conduct and Ethics Policy. PGL Beyond will work with the Supplier to set a corrective action plan to be implemented within the following timeframes; 12 months for those that PGL Beyond deems to be minor non-compliance issues, 6 months for medium risk and 3 months for those deemed high risk. Should a Supplier fail to cooperate in making corrective action, PGL Beyond reserves the right to terminate the supplier contract or agreement. It is generally the case that only in instances where suppliers consistently fail to meet the standards set out and do not make any efforts to improve plans provided will suppliers have their contract terminated. In extreme cases, failure to meet the standards may constitute material breach of contract when we may consider terminating the relationship immediately.

We refer to "suppliers" as any third party that provides goods or services to PGL Beyond for compensation. For purposes of this Supplier Code of Conduct and Ethics Policy, a supplier is defined as suppliers, vendors, distributors, fulfilment, channel partners, agents, contractors, outsourced staffing services and all other third parties and affiliates of PGL Beyond and its network of brands.

As PGL Beyond strives to improve all areas of its business relating to its people, ethics and the environment, we would like to use this as an opportunity to further develop and strengthen our relationships with our suppliers. We strongly encourage you to reach out if you would like any further guidance or insight into areas, policies or strategies outlined below, or wider support on your own due diligence and compliance practices.

Scope

BUSINESS ETHICS AND INTEGRITY

Corruption and Bribery

PGL Beyond operates a strict policy in line with UK law and applies to all activities, no matter where they are carried out.

Suppliers are expected to comply with all applicable anti-corruption laws and regulations and, to this effect, have a zero-tolerance policy towards any form of bribery, corruption (including fraud, money laundering and tax evasion), extortion, and embezzlement. Suppliers shall not pay bribes or make any other inducement (including kickbacks, facilitating payments, excessive gifts and hospitality, grants or donations) in relation to their business dealings with customers and public officials. Suppliers are expected to perform all business dealings with honesty and transparency.

As a minimum, we expect our suppliers to:

- Adhere to applicable anti-corruption and anti-bribery laws, directives and regulations that govern operations in the countries in which they operate.
- Never offer or accept anything of value where there is an intention of improperly influencing a business decision, or where the person may not be permitted by their employer or local law to receive it.
- Disclose to PGL Beyond where they or their associates may have connections with government officials and never bribe government officials of any kind.

Gifts and Entertainment

PGL Beyond recognises that market practice varies across the international arena and what is normal and acceptable in one place may not be in another. We understand that to refuse a gift can sometimes cause offence, therefore we have a very clear and straightforward policy to ensure that everyone understands what is acceptable and what is not.

Suppliers must not offer, give or accept gifts, including entertainment that could create or appear to create improper influence on a business relationship or decision.

In particular, suppliers should not give money or anything of value, directly or indirectly, to government officials or political candidates in order to improperly obtain or retain business. “Government official” is interpreted widely, and can include, but is not limited to, any person holding an executive, legislative, judicial or administrative public office, or a person or company doing business on their behalf, or any government employee.

Fair Competition

All suppliers must abide by competition and anti-trust laws. The supplier must not enter into any agreement or arrangement to limit competition or gain an improper advantage such as fixing prices, dividing markets, limiting or controlling production or capacity, exchanging information on PGL Beyond prices, participating in collusive agreements or any other similar anti-competitive activities.

Conflicts of Interest

PGL Beyond expects its relationships with suppliers to be free from conflicts of interest. This includes anything which would cast doubt on the supplier’s ability to act with total objectivity with regards to the distribution of PGL Beyond’s products and/or services. If the supplier feels that any actual or potential conflict of interest (or even the appearance of one) has arisen or may arise, it must disclose this to their point of contact at PGL Beyond.

Export Controls

Suppliers are expected to adhere to national and international foreign trade control laws pertaining to business transactions with countries, companies and persons (sanctions), and the transfer of goods and services, software or technology between countries (export controls).

Business Records

We expect suppliers to keep accurate and up-to-date records of matters related to their business with PGL Beyond. This includes maintaining complete and accurate records of sales of PGL Beyond products and services, sales to PGL Beyond, or purchases from PGL Beyond. False or misleading documentation, whether or not it results in personal gain, is never permissible.

HUMAN RIGHTS AND LABOUR STANDARDS

PGL Beyond is a responsible global business and as such we are committed to working with our suppliers and partners to ensure all workplaces within our supply chain are free of Modern Slavery and trafficking.

PGL Beyond has many robust policies which form part of our approach to identifying and preventing slavery from occurring in any part of our business. Suppliers are assessed and placed within specific risk categories. High-risk suppliers are asked to provide factory audits or potentially facilitate an audit instructed by PGL Beyond.

Suppliers should respect internationally recognised human rights expressed in the International Bill of Human Rights and the principles in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

We choose to work with suppliers who not only share our ethical approach to business but who are prepared to work with us to reach our goals with regard to Modern Slavery. PGL Beyond therefore requires all suppliers to have their own Modern Slavery Statement which should include statements on: Working Hour, Child Labour, Forced Labour, Prison Labour, Disciplinary measures, Freedom of Association and Collective Bargaining Discrimination, Harassment and Abuse Transparency within their own operations and their supply chains.

WHISTLEBLOWING

PGL Beyond is committed to dealing responsibly and professionally with any concerns about malpractice - be it a danger to PGL Beyond employees, the general public, financial malpractice, breach of legal obligations or damage to the environment.

PGL Beyond therefore requires all suppliers to ensure that a whistleblowing policy is operational in their businesses and that all employees are aware of it and know how to use it.

GRIEVANCE POLICY

PGL Beyond believes that all employees should be treated fairly and with respect. It operates a comprehensive grievance policy to ensure that all employees have the ability to discuss and manage any grievances they may have within a framework of meetings starting with their direct line manager.

It is therefore seen as essential that all PGL Beyond suppliers and trading partners operate a similar system with their own grievance mechanisms in place.

EQUALITY AND DIVERSITY

PGL Beyond is committed to eliminating discrimination and encouraging diversity amongst its employees. Our aim is that our employees will be truly representative of all sections of society and each employee feels respected and able to give their best.

PGL Beyond does not tolerate harassment or discrimination in any aspect of the employment relationship; including recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, discipline, termination or retirement, on the basis of race, religious belief, colour, gender, pregnancy, childbirth or related medical conditions, age, national origin, ancestry, sexual orientation, gender identification, physical or mental disability, medical condition, illness, genetic characteristics, family care, marital status, status as a veteran or qualified disabled veteran (in the USA only), caste, socio-economic situation, political opinion, union affiliation, ethnic group, illness any other classification protected under applicable law. All employment decisions by suppliers must be made based on the principle of equal employment opportunity and shall include effective mechanisms to protect migrant, temporary or seasonal workers against any form of discrimination.

PGL Beyond considers equal opportunities a mandatory focus within our business. We seek to work with suppliers that value diversity throughout their business and mirror our own practices above.

WAGES AND BENEFITS

PGL Beyond aims to work with suppliers who progressively increase employee living standards through improved wage systems, benefits and welfare programs that exceed the minimum legal requirements in their jurisdictions. Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's and their family's basic needs and provide some discretionary income. Employers should pay wages which are equal to or exceed minimum wage and comply with all legal requirements on wages.

GENDER PAY GAP

The Gender Pay Gap is a very high-level calculation that expresses the difference in the hourly rate of pay between men and women as a percentage of female pay. The Gender Pay Gap can be driven by a whole array of different factors, but crucially this is often driven by a lack of women in senior positions within an organisation. It is very important that we understand that the Gender Pay Gap is a key indicator that informs us of our progress. As a progressive business, we are committed to ensuring a level playing field for all of our employees.

We feel that it is essential that all of our suppliers are working towards establishing a Gender Pay Gap Policy that allows for progress and fair pay and conditions for all.

PREGNANCY, BIRTH AND ADOPTION LEAVE POLICY

At PGL Beyond we understand that having or adopting (including through surrogacy) a child is a life-changing experience and we want to ensure that our colleagues feel supported by us during this exciting and important time.

Our pregnancy, birth and adoption leave policies provide clear information and guidance to ensure that all employees are able to see exactly what their entitlements are. Help is provided so that each person feels supported. Additionally, when the time comes to return to work, we offer support to ensure that this transition is handled in the best way possible.

PGL Beyond believes strongly that it is vital to offer this type of support and therefore requires its suppliers to offer a similar service to its employees.

PARTNER LEAVE POLICY

The PGL Beyond Partner Leave Policy provides support for parental and other dependent leave. It is recognised that it is not only the birth mother or primary adopter who needs support but another person in a shared parental role.

PGL Beyond believes strongly that it is vital to offer this type of support and therefore requires its suppliers to offer a similar service to its employees.

ALCOHOL AND DRUG MISUSE AND TESTING POLICY

We are mindful of the impact of drug and alcohol misuse across society generally and specifically within the workplace and want to ensure a safe and professional environment for all our guests, colleagues and anyone else who visits any of our sites.

Whilst we are respectful of colleagues' privacy, given the nature and focus of our business and safeguarding responsibilities, we must balance this with our absolute requirement to ensure a safe environment, free from the impairing effects of drugs and alcohol.

It's important that all our colleagues, and anyone else on our premises are clear about what we expect when it comes to drugs or alcohol use and are aware that we have in place a testing regime which applies to all colleagues.

Our policy provides clear and detailed information and is covered in all new starter sessions. We expect our suppliers to operate a similar policy and are happy to provide guidance and support if needed.

ENVIRONMENTAL AND SOCIAL IMPACT

Environmental Policy and Regulations

PGL Beyond requires suppliers to comply with all relevant local and national environmental laws and international standards. Suppliers must also agree to have their environmental policies, procedures and initiatives reviewed by PGL Beyond on request. Where applicable suppliers are required to continuously monitor, and disclose their energy, water, waste and emissions to PGL Beyond. We expect suppliers to take a progressive approach to minimise their negative impact on the environment, with a publicly available Environmental Policy that addresses the key impacts of their operations and commits to improvement.

HEALTH AND SAFETY

Laws and Regulations

Suppliers must comply with all applicable local and national health and safety laws and regulations. This includes those related to the construction and maintenance of facilities for employees and contract workers.

Safe Working Environment

Suppliers are required to have a formal Health and Safety Policy in place. Suppliers must also have effective procedures in place to identify, evaluate and control worker exposure to health and safety hazards. Health and safety incidents should be monitored and reported alongside correction actions against incidents. Suppliers are expected to provide adequate safety and awareness training to their employees, subcontractors or anyone in their supply chain on workplace hazards, procedures, and safeguards.

Risk Assessment

We expect our suppliers to conduct routine risk assessments, reflecting existing and emerging issues and good practices; to understand health and safety issues both generally and specifically for their sector; and to take appropriate action to mitigate identified risks.

DATA SECURITY

Confidentiality and Personal Information

PGL Beyond endeavours to protect the integrity and confidentiality of all data held within the business including employee information as well as business and supplier data.

We expect our suppliers to ensure appropriate technical and organisational security measures to safeguard the confidential and personal information of PGL Beyond and to meet the requirements of applicable data privacy laws and regulations to ensure there is no disclosure of our confidential information to third parties without our prior authorisation. We also expect our suppliers to inform PGL Beyond immediately in the event of a potential or actual data breach, or if our information is released without authorisation.

ETHICAL MARKETING

As a business committed to enriching the lives of young people, we're passionate about being a force for good in all areas of our operation – including our marketing.

We expect all suppliers to commit to the highest standards of ethical marketing and go beyond legal compliance to ensure fair, safe, honest and inclusive marketing practices and activity across all customer touchpoints.

SEXUAL HARRASMENT

PGL are committed to providing a safe and respectful environment for all colleagues and third parties. We have a zero-tolerance approach to sexual harassment. Sexual harassment occurs when a colleague is subjected to unwanted conduct, which is of a sexual nature. All incidents of sexual harassment by third parties will be dealt with swiftly and robustly by PGL Leadership Team and may include police involvement. Any allegation of sexual harassment may result in a request to leave the premises and may result in a ban from future attendance on a PGL site.