



By Royal Appointment to
HRH The Prince of Wales
Supplier of Biochar Products
Carbon Gold Ltd
North Somerset, England



Environmental, Social and Governance (ESG) Code of Conduct for a Supplier

“This Code” means this ESG Code of Conduct for a Supplier document.

“ESG” means Environmental, Social and Governance.

“Customer” in this Code means Carbon Gold Ltd.

“Supplier” in this Code means any business or other entity that agrees to or does supply any goods, services, or facilities to the Customer at any time.

The ESG policy of the Customer is to ensure so far as applicable and reasonably practicable that its operations, activities, and conduct, and those of its Suppliers, will be carried out with a commitment to:

- (a) protecting and enhancing the environment by minimising negative impact and maximising positive impact on the environment.
- (b) ensuring appropriate conduct towards, positive impact on and good relationships with employees, customers/clients, suppliers, and the community in which the Customer and its Suppliers operate; and
- (c) conduct their business with integrity and high standards of business ethics, through appropriate structures, systems, processes, and procedures.

(“ESG Commitment”)

The ESG Commitment is a fundamental principle of the Customer’s business.

Customer’s General ESG Principles

In fulfilling the ESG Commitment, the Customer seeks to:

- comply with all applicable local and national laws, rules, regulations and other measures having the force of law that are relevant to any aspects of the ESG Commitment; and
- where it is practicable and appropriate to do so, establish and meet standards relevant to any aspects of the ESG Commitment which are higher than the standards imposed by law.

Suppliers’ Commitment

This Code sets out the minimum standards that must be met by the Customer’s Suppliers [and their suppliers and sub-contractors] in order to assist the Customer to maximise its ability to meet the ESG Commitment.

Each Supplier is required to:

- comply with this Code.
- adopt and implement policies, standards and processes fully consistent with the Supplier’s commitments¹ set out under the Environmental, Social and Governance headings below;
- Have systems in place to ensure compliance and to demonstrate that it is compliant and permit the Customer to conduct audits to verify the Supplier’s compliance with this Code
- sign and return a copy of this Code to the Customer.

Environmental

The Supplier will:

1. Ensure that its operations, the goods that it manufactures and the components that it incorporates into its goods comply with all applicable environmental protection laws and regulations and require its goods and services supply chain to do so.
2. Operate management procedures to include environmental factors [and carry out environmental audits when required]
3. Continuously improve environmental performance and integrate recognised environmental best practice into business operations
4. Measure, and act to reduce, the carbon footprint of business activities
5. Promote environmentally friendly responsible purchasing within the Supplier and its goods and services supply chain
6. Promote a culture of environmental awareness amongst all employees and seek to require its goods and services supply chain to do so
7. Have in place a suitable environmental management system for identifying and managing environmental risks and hazards.
8. Protect the environment by preventing pollution of land, air or water via leakage of liquids gases or solids
9. Minimize its negative effect on biodiversity, climate change and water scarcity
10. Swiftly respond to accidents or incidents that have a potential to threaten the environment
11. Manage and dispose of all waste in a responsible manner in ways that show concern for the environment
12. Manage waste generated from business operations according to the principles of reduction, re-use and recycling.
13. Use packaging materials that comply with all applicable environmental laws and regulations
14. Recycle all packaging materials and ensure that as many waste materials as possible are recycled] [and require its goods and services supply chain to do so
15. Ensure that it safely handles and transports all hazardous or toxic materials and products and require its goods and services supply chain to do so
16. Provide advice to the Customer and others as appropriate on safe handling, transportation, storage and final disposal of the Supplier's products.

Social

The Supplier will²:

1. Comply with [and require its goods and services supply chain to comply with,] all applicable anti-slavery and human trafficking laws, statutes, regulations and codes, including the Modern Slavery Act 2015 and other laws etc. prohibiting forced or compulsory labour, child labour, bonded labour, prison labour)]
[not infringe and will prohibit its goods and services supply chain from infringing, any internationally recognized human rights, including those recognised in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.
2. Provide and maintain a working environment free from all forms of discrimination, harassment
3. Not to discriminate in selection, engagement, placement, training, promotion, transfer or compensation or other treatment or dealing with any employees on the basis of union membership or political affiliation, gender, gender identity or expression, gender reassignment, sexual preference, race, colour, caste, creed, religion, nationality or national origin, ethnicity or ethnic origin, ancestry, age, marital or pregnancy status, civil partnership or disability or any other characteristic.
4. Permit employees' freedom of association, union membership and collective bargaining, in accordance with applicable laws, in order to protect or represent their interests]

² See note 2 above.

5. Promote, and require its goods and services supply chain to promote,] diversity and inclusion amongst its and their workforce]
6. Comply with workplace health and safety laws and standards, and will take steps [and require its goods and services supply chain to take steps] to mitigate risks to health and safety in the workplace, prevent workplace hazards and work-related accidents and injuries
7. Provide fair [and competitive] remuneration (including overtime premiums), benefits, working hours, attendance, leave and sick leave policies, ensuring as a minimum that remuneration is sufficient to cover basic living requirements and that working hours do not exceed the maximum permitted by applicable laws [and industry standards]
8. Encourage employees to participate in appropriate further education and training (including any education or training that the Supplier or its goods and services supply chain is able to provide in-house) which supports their work-related development.
9. Support the local community by employing local people where and to the extent appropriate and reasonable to do so.

Governance

The Supplier will³:

1. Ensure that it complies with all applicable local and national laws and regulations, relevant standards and codes of practice relating both generally and in particular to transparency and corporate governance
2. Promote strong oversight and transparency at all levels of its organisation
3. Establish and maintain high standards of business ethics conduct, and promote a culture of integrity, honesty, ethical and responsible conduct in its business activities and behaviours
4. Comply with all applicable laws relating to bribery and corruption (including the Bribery Act 2010) prohibit any bribery or corruption of, or by, any of its officers or employees [and require its goods and services supply chain similarly to comply with such laws and to prohibit their officers and employees from engaging in any bribery or corruption]
5. Prohibit any money laundering by any of its officers or employees and require its goods and services supply chain similarly to prohibit their officers and employees]
6. Maintain and implement policies covering anti-bribery and corruption, code/s of conduct, conflicts of interest, privacy and human resources, as part of the governance structure of the Supplier.
7. Avoid investment in or any other connection with, and prohibit its goods and services supply chain from investing in or having any other connection with, industries with a negative social impact, for example, gambling, tobacco, pornography or weapons manufacture/sales
8. Comply with all applicable data protection laws and requirements (including the UK GDPR) when processing any personal data on behalf of the Customer, and maintain appropriate privacy and data security measures to protect the integrity and confidentiality of information held on its systems (including information supplied by the Customer and information of employees goods and services supply chain, and ensure that there is no unauthorised access to any such information by third parties including its goods and services supply chain]
9. Ensure that its products and/or services meet all relevant standards of safety and quality for the benefit of its and the Customer's clients

Viewing and updating this Code

[The Customer will publish this Code (as amended from time to time) on its public website so that it is freely available to all Suppliers and others to view at any time.]

The Customer will periodically review and update this Code as necessary.

On each occasion that this Code is updated, the Customer will notify Suppliers [by email] that it has been updated The updated version of this Code will be effective 30 days after that notification.]

Signatory for Carbon Sue Rawlings
Gold

Signature:  Recoverable Signature

X Sue Rawlings

Sue Rawlings
Managing Director
... Signed by: Susan Rawlings

Dated: 01/04/2022

A copy of the Code, signed and dated on behalf of the Supplier, should be returned to the Customer.



PO Box 270, Clevedon, BS21 9DN
Tel: +44 (0)117 2440032
Email: info@carbongold.com
Company Registration No 06373463
VAT number 947605986

