



# TENTH REVOLUTION

## Supplier Code of Conduct

This statement describes the behaviors observed by all companies, trademarks and trading names under the Tenth Revolution Group umbrella (the "Group").

November 2024

# Overview

At Tenth Revolution Group, we are the global leaders in solving the technology skills gap by finding, training or deploying people, and we deliver consulting services through our unique talent solutions.

We are committed to maintaining a reputation for excellence across the tech industry whilst providing the services to our customers globally. Our collaboration with suppliers is integral to our business and we encourage our suppliers and potential suppliers to align with our values, ethical commitments and responsible business practices by adhering to this Supplier Code of Conduct and encouraging the adoption of similar standards throughout their supply chain.

# Purpose

The purpose of this code of conduct is to set out the behaviours we uphold as a Group. We support the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption and are committed to adhering to high ethical and a social standards at all times and in full compliance with laws and regulations in the jurisdictions in which we operate.



# Our core values

What matters to us?

## We have fun

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- We bring good vibes and energy into everything we do
- Building connections with others means everything to us
- We love to celebrate success as a team

## We are the experts

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- We pioneer new ways to tackle the tech skills gap
- We are proud of our unparalleled expertise
- We get a buzz from being the best at what we do

## We're all about people

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- Helping others achieve their dreams inspires us
- We have a thirst for knowledge and love to learn
- We think, talk and act with empathy and respect

## We transform lives

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- We love to imagine, innovate and embrace new opportunities
- We empower others to make a positive difference
- We are proudly creating a better tomorrow for talent everywhere

## We Go Beyond

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- We get things done today, so we can make the most of tomorrow
- We are driven, ambitious and leave no stone unturned
- We relish the challenge and thrive on delivering results

# Our Behaviours

We expect our Suppliers to make every effort to comply with the following standards and behaviours at all times during their relationship with Tenth Revolution Group:

## Anti-Bribery and Corruption

It is our policy to conduct all our business in an honest and ethical manner and foster trust with our customers, partners, investors and suppliers. We take a zero-tolerance approach to bribery and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We expect all suppliers to act with integrity and reject financial impropriety, complying with the anti-bribery and anti-corruption laws in their jurisdiction, including where applicable, the UK Bribery Act 2010 and the UK Criminal Finances Act 2017.

Suppliers should maintain policies that prohibit bribery and any form of corrupt practices. Any attempts at bribery or corruption and/or involvement in such activities will be regarded as a fundamental breach of agreement.

## Health and Safety

The Group is committed to ensuring the health, safety and welfare of its employees and it will, so far as is reasonably practicable, establish procedures and systems necessary to implement this commitment and to comply with its statutory obligations on health and safety. We expect our suppliers to observe all relevant health and safety legislation wherever they are working on Group's business and act in a responsible manner towards their customers, colleagues and suppliers, taking precautions to prevent accident and injury to health related to or arising from the supplier's business activities.

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## Quality Management

We are committed to maintaining a reputation for excellence across the tech industry whilst providing services to our customers. We follow procedures that help us to monitor and review our performance and identify areas for improvement. We encourage our suppliers to take a similar approach to delivering a high standard of customer care.

## Equality

The Group is an equal opportunity employer and is fully committed to practices that promote a fair and equitable workplace for all employees. The Group will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, veteran's status, gender reassignment, age, marital or civil partnership status or disability (the "Protected Characteristics"). The Group will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity. The Group will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Group.

## Sanctions

We are committed to not working with companies or individuals who are named on prohibited lists published by countries around the world. Supplier must immediately let us know if the Supplier or any of its employees currently providing services to us or our customers appear on any official government sanctions or prohibition lists.

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## Preventing Criminal Facilitation of Tax Evasion

We will not participate in any arrangement, agreements or scheme to avoid taxes in any country in the world. We have a multi-point compliance process which, among other goals, is aimed at identifying and stopping any tax evasion schemes. We expect our suppliers to refrain from any act or plan to evade or avoid taxes arising out of the work they perform for us or our customers.

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## Human Rights

Tenth Revolution supports efforts to protect human rights and wishes to work with partners that share this goal. Suppliers should adopt accessible and clear policies and procedures that respect human rights and labour law of their employees, suppliers, business partners and communities, such as on equality, anti-discrimination and modern slavery.

## Data privacy and security

It is vital to the group and our customers that suppliers protect and not disclose the personal data and sensitive information (collectively, "Personal Data") that the supplier and its employees may have access to while performing services for the company or our customers.

For those suppliers engaging in professional technical services for the group, they must comply with the various data privacy and data security requirements set forth in their written agreement with the group. Suppliers should implement all reasonable technical and organizational measures necessary to safeguard the Personal Data. The group also expects all suppliers to comply with all data privacy and data security laws in their local jurisdiction.

## Modern Slavery

We expect our suppliers to follow all legislation in their respective jurisdictions where they operate. Suppliers must not engage in illegal child labour and must pay wages in accordance with all applicable laws. Where appropriate, we expect our suppliers to publish their own policies on Modern Slavery and Human Trafficking and to supply a copy of such policies to the Group or its customers on request. Suppliers should implement appropriate due diligence practices to ensure their business operations are free from slavery and human trafficking, both internally and within their supply chains.

## Sustainability

The services we provide have an impact on the lives of thousands of individuals and hundreds of businesses every day. We recognise our environmental and social responsibilities and strive to promote best practice at every level of our organisation.

We expect our suppliers to acknowledge their responsibility to conduct their business in a sustainable manner. This should encompass environmental, social, human and economic considerations, where relevant. Suppliers should adhere to applicable local and national laws and regulations pertaining to environmental protection, in all countries of operation and strive to reduce any negative environmental impact.

## Setting Targets

Tenth Revolution is committed to working towards net zero by 2050 and have set near-term targets to reduce our own greenhouse gas emissions.

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We will work actively with our suppliers to reach our shared environmental ambitions and therefore encourage all our suppliers to:

- commit to the Science Based Target initiatives (SBTi's) where applicable. Further information on our science-based targets commitments can be found ([insert link to sbti](#))
- establish a decarbonization pathway in line with applicable guidelines
- implement an environmental strategy and establish relevant performance indicators and targets, including but not limited to:

Reduction of Greenhouse Gas (GHG) emissions, water management, waste prevention, energy usage and sustainable procurement.



## Whistleblowing

We believe in openness and accountability, which includes the fair treatment of any employees who wishes to raise a concern about any suspected wrongdoing. We encourage our suppliers to create fair and transparent procedures for employees who may wish to report concerns including, where appropriate, external whistleblowing hotlines. Suppliers can report any concerns that they have by informing their group point of contact about their concern or by utilizing the group's free, anonymous third party provided complaint service, Lighthouse. A supplier or its employees can file a complaint with Lighthouse 24/7 by using the information below:

Tenth Revolution Group are committed to thoroughly investigating each reported incident and providing an appropriate response and expect open cooperation from our suppliers.

If a supplier has any questions about this Code of Conduct, they should email: [legalnoticesemea@tenthrevolution.com](mailto:legalnoticesemea@tenthrevolution.com)

## By mail to:

If in the US, Tenth Revolution Group, 2001 Market Street, 11th Floor, Philadelphia, PA 19103, Attn: Senior Deputy General Counsel

If outside of the US, Tenth Revolution Group, St Nicholas Building, St. Nicholas Street, Newcastle upon Tyne, Tyne and Wear, NE1 1RF Attn: Head of Group Legal;

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## By email to:

[k.jones@tenthrevolution.com](mailto:k.jones@tenthrevolution.com) (General Counsel)

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## Via our third party provided toll free hotline:

### By phone at:

- 833-940-2875 (if in US)
- 011-44-808-189-0041 (if in UK)
- 800-603-2869 (if in any other country - must dial country access code before dialling "800"),

Via email at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report) or [www.lighthouse-services.com/frankgroup](http://www.lighthouse-services.com/frankgroup).

## Modification

The Group expressly reserves the right to change, modify or delete the provisions of this Policy without notice.

## Governance and oversight

This Statement is ultimately governed by the Tenth Revolution Group Executive Board.

Signed: Peter White, Chief Financial Officer and TRG Executive Board member

Supplier Code of Conduct		Rev No: 003 Rev Date: 26.11.24
Author	Approved By	Review Period: Annual
V1 - Rosie Ifould	Lewis Miller	
V2 - Elle Parker & David Liebman	Lewis Miller	
V3 – Kelly Jones, Elle Parker	Peter White	



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