# ETHICAL BUSINESS PRACTICE POLICY

## Policy brief & purpose

Q3 Facilities Holdings Limited (Q3) (including all subsidiary companies such as Q3 Services Group Limited, Q3 Security Limited, Q3 Grounds Services Limited, Q3 Technical Services Limited and Q3 Services (CI) Limited) is committed to conducting business ethically, responsibly and sustainably in all aspects of our operations. We recognise that our activities, purchasing decisions and supply chain relationships have an impact on people, communities, the environment and the wider economy.

Q3 seeks excellence in every aspect of our business and is committed to minimising the social, environmental and ethical impacts of our operations and supply chain. We aim to purchase goods and services that reduce negative impacts and enhance positive outcomes for society and the environment whilst continuing to meet operational and commercial requirements.

This policy establishes the ethical standards expected of Q3 employees, contractors, suppliers and business partners and supports our commitment to responsible business practices, legal compliance, environmental and social value.

This policy operates alongside Q3's:

- Anti-Bribery and Corruption Policy
- Modern Slavery Policy
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Data Protection Policy
- Environmental Policy
- Sustainable Procurement Policy
- Code of Conduct

## Scope

This policy applies to:

- All Q3 employees, workers and contractors.
- Agency workers and consultants engaged by Q3.
- Suppliers, subcontractors and service providers.
- Any organisation acting on behalf of Q3.

## Our Commitments

Q3 is committed to:

- Conducting business honestly, fairly and with integrity.
- Complying with all applicable laws, regulations and industry standards. Including, where applicable, public procurement legislation and government procurement requirements
- Promoting responsible and sustainable procurement practices.
- Protecting human rights throughout our operations and supply chain.
- Supporting equality, diversity and inclusion.
- Maintaining robust governance and accountability arrangements.
- Preventing bribery, corruption, fraud, modern slavery and unethical business practices.
- Protecting confidential, commercially sensitive and personal information.
- Supporting our environmental sustainability and Net Zero objectives.
- Delivering positive social value in the communities where we operate.

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Supporting Environmental, Social and Governance (ESG) objectives through responsible business practices, sustainable decision-making and continual improvement.

The Q3 Board will provide oversight of this policy and ensure sufficient resources are available to support its implementation.

## Governance and Responsibilities

Q3 will:

- Assign responsibility for implementation and monitoring of this policy to designated managers.
- Ensure employees are aware of their responsibilities under this policy.
- Monitor supplier compliance through appropriate due diligence and risk assessment activities.
- Review this policy annually and update it to reflect legislative, operational and business changes.
- Periodically review ethical business risks, including modern slavery, human rights, bribery, fraud, workplace harassment and supply chain risks, and implement proportionate controls to address identified risks.
- Maintain reporting mechanisms through which concerns can be raised safely and confidentially.

## Ethical Procurement Principles

Q3 will operate a robust procurement process that is transparent, objective and compliant with applicable legislation and industry standards.

When selecting suppliers, Q3 will consider:

- Quality, cost and service delivery.
- Environmental sustainability.
- Social value contributions.
- Ethical business conduct.
- Modern slavery controls.
- Equality and inclusion practices.
- Data protection and information security standards.
- Regulatory compliance history.

Q3 will:

- Work collaboratively with suppliers to drive continuous improvement.
- Recognise equivalent ethical, environmental and social standards adopted by suppliers.
- Use a risk-based approach to supplier management.
- Undertake proportionate due diligence on suppliers and subcontractors based on the level of legal, ethical, environmental and operational risk presented.
- Encourage responsible supply chain practices within our industry.
- Cease trading with suppliers that demonstrate persistent or serious breaches of ethical, social or environmental standards.

## Social Responsibility and Human Rights

Q3 is committed to respecting and promoting internationally recognised human rights principles, including those contained within the United Nations Universal Declaration of Human Rights and International Labour Organisation (ILO) conventions.

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We expect all suppliers and business partners to uphold the following standards.

Q3 will undertake proportionate human rights due diligence within its operations and supply chain, seeking to identify, mitigate and monitor actual or potential adverse human rights impacts.

- **Child Labour**
  Suppliers must not employ children in breach of applicable legislation.

  Young workers under the age of 18 must not be employed in hazardous work or work that may jeopardise their health, safety or education.

- **Forced Labour and Modern Slavery**
  There shall be no forced, bonded, compulsory or involuntary labour.

  Suppliers must comply with the Modern Slavery Act 2015 and implement appropriate measures to identify, prevent and address risks of:

  - Modern slavery.
  - Human trafficking.
  - Forced labour.
  - Child labour.
  - Exploitative working practices.
  - Workers must not be required to surrender identity documents or deposits as a condition of employment.

- **Equality, Diversity and Inclusion**
  Q3 is committed to providing an inclusive environment free from discrimination, harassment and victimisation.

  No individual shall be treated less favourably on the grounds of:

  - Age.
  - Disability.
  - Gender reassignment.
  - Marriage or civil partnership.
  - Pregnancy or maternity.
  - Race.
  - Religion or belief.
  - Sex.
  - Sexual orientation.

- **Prevention of Harassment**
  - Q3 expects all workplaces to be free from harassment, bullying and inappropriate conduct.
  - Q3 is committed to taking all reasonably practicable and proportionate measures to prevent sexual harassment and other unlawful harassment, including risk

assessment, employee training, reporting mechanisms, investigation procedures and appropriate action where concerns are raised.

- **Health, Safety and Wellbeing**
  Workers should be provided with a safe and healthy working environment.

  Suppliers must:

  - Comply with applicable health and safety legislation.
  - Provide appropriate information, instruction and training.
  - Maintain safe systems of work.
  - Provide suitable welfare facilities.
  - Actively manage workplace risks.

- **Freedom of Association**
  Workers have the right to join trade unions and representative bodies in accordance with applicable law.

  Q3 respects lawful employee representation and consultation arrangements.

- **Working Hours**
  Working hours shall comply with applicable employment legislation and industry requirements.

  Overtime should be voluntary wherever practicable and appropriately compensated.

- **Remuneration**
  Workers shall receive wages and benefits that meet or exceed statutory requirements.

  Employees shall receive clear written information regarding pay, benefits and employment conditions.

  Unlawful deductions from wages are prohibited.

- **Employment Terms**
  Workers shall be provided with clear, understandable written terms and conditions of employment.

  Employment arrangements must comply with applicable employment laws and reflect fair and lawful employment practices.

- **Community Impact**
  Q3 encourages suppliers and employees to contribute positively to the communities in which they operate.

  This includes supporting community initiatives, employment opportunities, skills development and social value programmes.

**Environmental Responsibility**

Q3 seeks to minimise environmental impact throughout its operations and supply chain.

Suppliers should maintain environmental management arrangements proportionate to their activities and demonstrate continual improvement in environmental performance.

Suppliers are expected to:

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- Minimise energy, water and resource consumption where practicable.
- Reduce greenhouse gas emissions.
- Support waste reduction, reuse and recycling.
- Prevent pollution and contamination.
- Comply with environmental legislation.
- Consider environmental impacts when designing products and services.
- Support sustainable sourcing practices.

Q3 will support suppliers that contribute towards carbon reduction, environmental sustainability and responsible resource management.

## Business Ethics and Integrity

Q3 maintains a zero-tolerance approach to unethical business conduct.

Employees and suppliers must not engage in:

- Fraud.
- Bribery or corruption.
- Money laundering.
- Facilitation payments.
- Facilitating tax evasion or assisting others to evade taxation.
- Insider trading.
- Conflicts of interest that are not properly declared and managed.
- Unauthorised access to personal or business information.
- Any activity that could damage the integrity or reputation of Q3.

Q3 will comply with applicable UK sanctions regimes, export control legislation and financial crime prevention requirements.

Appropriate controls, training and monitoring arrangements will be maintained to support compliance.

## Data Protection and Information Security

Q3 is committed to protecting personal, confidential and commercially sensitive information.

All employees, suppliers and business partners are expected to:

- Comply with UK GDPR and the Data Protection Act 2018.
- Maintain appropriate information security controls.
- Protect confidential information from unauthorised access, use or disclosure.
- Report actual or suspected data breaches promptly.

## Speaking Up and Whistleblowing

Q3 encourages employees, suppliers and stakeholders to raise genuine concerns regarding unethical, unsafe or unlawful conduct.

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Reports may be made through established reporting routes, including those contained within the Q3 Whistleblowing Policy.

Individuals raising concerns in good faith will not be subjected to retaliation, victimisation or detriment.

Q3 will protect individuals who make protected disclosures in accordance with applicable whistleblowing legislation and will not tolerate dismissal or detrimental treatment resulting from a genuine concern being raised.

## Supplier Monitoring and Compliance

Q3 reserves the right to assess supplier compliance with this policy through:

- Due diligence activities.
- Supplier questionnaires.
- Audits.
- Contract reviews.
- Corrective action plans.

Where serious or persistent breaches are identified, Q3 may require remedial action, suspend supplier engagement or terminate contractual arrangements in accordance with contractual rights.



Stuart Bellew
Chief Operating Officer
1st April 2026

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