

Third-Party Code of Conduct for Suppliers, Clients and Guests

PURPOSE

This Third-Party Code of Conduct sets out the minimum standards of behaviour, professionalism and legal compliance expected of all third parties interacting with Kew Green, including suppliers, customers, clients, service users, members, self-employed consultants, contractors, tradespeople and members of the public. It applies to these third parties and where relevant, to their employees, agency workers, contractors, subcontractors, consultants and representatives who attend Kew Green premises, interact with Kew Green colleagues, clients or guests, or carry out work on Kew Green's behalf. Third parties must ensure that their personnel understand and comply with this Code and must take appropriate steps to manage risks arising from their activities or conduct.

WORKPLACE BEHAVIOURS, HARASSMENT AND SEXUAL HARASSMENT

For the purposes of this Code, a third party includes any person who is not employed by Kew Green but who interacts with Kew Green colleagues in connection with work, including but not limited to guests, customers, clients, suppliers, contractors, agency personnel, delivery partners, event attendees, visitors and members of the public. Harassment may occur in person, online, by telephone or through any other work-related communication channel.

Kew Green has zero tolerance for harassment, sexual harassment, discrimination, victimisation, bullying or other intimidating, hostile, degrading, humiliating or offensive conduct. Third parties must not engage in, encourage or permit such conduct by their personnel or any person under their control towards Kew Green employees, workers, agency workers, guests, customers, visitors or other third parties. They must identify relevant risks, set clear behavioural standards, provide appropriate training and supervision, and act promptly when concerns arise. These requirements support Kew Green's compliance with the Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023.

From 30 October 2026, sections 20 and 21 of the Employment Rights Act 2025 strengthen the preventative duty by requiring employers to take all reasonable steps to prevent sexual harassment of their employees and by making employers liable where a third party harasses an employee in the course of employment and the employer failed to take all reasonable steps to prevent it. Compliance with this Code is a contractual requirement intended to support those duties; it does not transfer Kew Green's statutory responsibilities to a third party.

- Unwanted verbal, physical, written, visual or online conduct of a sexual nature, including sexual comments, jokes, messages, images, gestures, staring, propositions, intrusive questions, unwanted touching or conduct connected with work-related social events.
- Inappropriate remarks, "banter", gestures, threats or actions that have the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- Harassment related to age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, together with retaliation or victimisation against anyone who raises a concern, supports a complaint or participates in an investigation.

Third parties must intervene promptly where it is safe and appropriate to do so, take reasonable steps to protect affected individuals, and report any allegation, complaint or observed incident involving their personnel without delay to the relevant Kew Green manager or site duty manager. Concerns must be handled sensitively, shared only on a need-to-know basis and protected from retaliation. The third party must preserve relevant information, maintain an appropriate record of the concern and the actions taken, cooperate fully with any Kew Green review or investigation, and take prompt and proportionate corrective action.

Kew Green may require the immediate removal of an individual from its premises or work, suspend services, notify the employing agency, regulator or appropriate authority, or terminate the relevant contract or relationship where a breach is substantiated, or adequate preventative or remedial action has not been taken.

Third parties must communicate these standards to all relevant personnel before work begins, provide suitable training, assess risks associated with customer-facing work, lone working, alcohol, overnight stays and work-related events, and maintain accessible reporting and escalation arrangements. Equivalent obligations must be included in contracts with subcontractors and labour providers. Third parties must monitor incidents, complaints and near misses for recurring risks, review the effectiveness of their controls and, on request, provide reasonable evidence of the risk assessments, preventative measures, training, incident records and corrective actions they have implemented.

Where third-party personnel work in guest-facing, lone-working, night-working, licensed, event or overnight environments, the third party must assess the risk of harassment and implement controls proportionate to the nature of the work and the people who may be encountered. Controls may include suitable staffing and supervision, clear escalation and call-for-support arrangements, access to a safe area, effective communication systems, de-escalation training, arrangements for managing intoxicated or abusive persons, and clear authority to withdraw from an unsafe situation. The assessment and controls must be reviewed after an incident, complaint or near miss and whenever there is a material change in working arrangements.

Third parties must comply with all applicable health and safety requirements, Kew Green site rules and reasonable instructions. They must ensure that their personnel are competent for the work, use required safety equipment, and immediately report hazards, unsafe practices, accidents and near misses.

The use, possession or supply of illegal drugs or controlled substances, and the misuse of alcohol or medication while working, is prohibited. Third party personnel must be fit for work and must not be impaired in a way that could affect safety, conduct or performance.

COMPLIANCE WITH LAWS AND REGULATIONS

Kew Green may incorporate equivalent conduct requirements into client contracts, event agreements, group booking terms, individual booking conditions and pre-arrival communications. These requirements may explain the behaviour expected towards Kew Green colleagues and other persons on the premises, how concerns may be reported, and the consequences of a breach. Contracting clients are responsible for ensuring that relevant requirements are brought to the attention of persons whose stay, attendance or services they arrange.

Third parties must comply with all laws, regulations and industry standards relevant to their goods, services and personnel, including employment and equality law, modern slavery

requirements, right to work obligations, health and safety law, data protection law and anti-bribery requirements.

Third party personnel must follow all relevant Kew Green policies, procedures, site rules and lawful instructions, including requirements relating to data protection, confidentiality, information security, social media, safeguarding, ethical conduct and the prevention of harassment.

Where accommodation, meetings, events or other services are provided under a corporate or group client contract, the contracting client must communicate Kew Green's conduct standards to its employees, travellers, delegates, guests, visitors and invitees. The client must take reasonable steps to support compliance, promptly assist with the identification and investigation of any person alleged to have breached these standards, and cooperate with proportionate action taken by Kew Green, including warnings, removal from the premises, refusal of further service or escalation under the relevant contract.

NON-COMPLIANCE AND REMEDIAL ACTION

Failure to comply with this Code may result in corrective action proportionate to the nature and severity of the breach. This may include requiring an improvement plan, additional training, removal or replacement of third-party personnel, suspension of work, reporting to regulators or law-enforcement authorities where appropriate, withholding of new work, or termination of the contract or supplier relationship. Third parties must promptly remedy identified failings and take steps to prevent recurrence.

EXPECTED BEHAVIOURS

All third parties attending a Kew Green site are expected to:

- Treat Kew Green colleagues, guests, customers, visitors and other third parties with dignity, courtesy and respect at all times.
- Behave professionally and refrain from harassment, sexual harassment, discrimination, bullying, victimisation, threatening behaviour, intimidation, offensive language or inappropriate "banter".
- Follow all site rules, safety requirements, security arrangements and reasonable instructions given by Kew Green colleagues.
- Respect the privacy, confidentiality, property and personal boundaries of others, and only access areas, systems or information for which permission has been granted.
- Remain fit to attend or work on site and not be impaired by alcohol, illegal drugs, controlled substances or the misuse of medication.
- Act responsibly, avoid causing damage, disruption or nuisance, and take appropriate care of Kew Green premises, facilities and equipment.
- Report hazards, accidents, near misses, safeguarding concerns, inappropriate conduct or suspected breaches of this Code promptly to the relevant Kew Green management.
- Cooperate fully and honestly with any reasonable review or investigation and comply with any proportionate action required by Kew Green.