

Supplier Code of Conduct



Contents

Foreward	3
Introduction	4
The code	4
Esken	5
Our values	6
Expectaion for suppliers	7
Human rights	8
Health and safety	9
Protection from abuse and discrimination	9
Legal and ethical business practice	9
Environment	10
Supply chain compliance	10

Foreward

At Esken, we want to go further in everything we do. We want to go further in creating a new airport experience for passengers. We want to go further in delivering renewable fuels to create cleaner energy. And we want to go further in delivering for our shareholders.

We can't do that without having great supply chain partners that share our business ethos.

That ethos is built around staying true to our values. These values are based on connectedness, taking care of those around us, owning it together and always seeking to improve.

Our values are central to everything we do, including how we work with our partners. That's why we have developed a supplier code of conduct.

This document sets out what you should expect from us, as well as what we expect of you. We want to have a respectful working relationship that reflects the importance of fairness, social responsibility, sustainability and transparency.

Our goal is to work with suppliers that share our values and work to the standards that are set out in this document. Of course, we know that you will have your own set of standards and our focus here is not to replace your own code of conduct. Instead, we hope that you see this document as complementary to what you are already doing. We also hope that it means that we are all on the same page and working together to deliver a fair and sustainable partnership.

Because together, we can succeed in doing the right thing.

Nick Dilworth

Esken Chief Operating Officer

March 2022



Introduction

Esken is fully committed to responsible business through our environmental, social and governance programme. We aim to drive our values and our responsible business practise through our supply chain and have written our first Supplier Code of Conduct.

This Code has been established because Esken relies on its suppliers and service providers for the safe and efficient delivery of its core and non-core projects and requirements.

Esken firmly believes in the importance of creating and maintaining a trusted bond with its suppliers. This document is intended to act as an outward reflection of internal values to ensure a mutual understanding of expectations in order to continue to cultivate the supplier bond.

The key to developing and maintaining an effective business relationship and an efficient supply chain is to ensure that all parties know exactly what is expected of them. This Code sets out how to fulfil your role as an Esken supplier and what you can expect from us.

Working within the policies and procedures set out in this Code will benefit both parties and it is therefore essential that you read, understand and comply with the terms set out in this Code.

The key to developing and maintaining an effective business relationship and an efficient supply chain is to ensure that all parties know exactly what is expected of them.

The Code

This Code of Conduct sets out Esken's expectations for all of its suppliers, service providers, sub-contractors and concessionaries irrespective of contract value or term length.

We recognise that the market in which we operate is constantly changing so we must continue to be flexible and will review our Code of Conduct as and when required to ensure that its contents and implementation remain appropriate and effective.

Please note that Esken may revise or update this Code from time to time. Esken will provide you a revised or updated copy as soon as possible (an up-to-date version will always be available on Esken's website) and Esken expects you to continue to comply with the Code as updated.

Esken

Who are we?

Esken Limited, the aviation and energy infrastructure group, is listed on the London Stock Exchange. As at the end of the financial year to 28 February 2021, Esken Limited had over 900 employees operating across two main operating divisions at sites throughout the United Kingdom.

The operating divisions can be summarised as follows:

- Esken is focused on creating value through airports and aviation services. It has two main assets, London Southend Airport and Stobart Aviation Service. It also owns Carlisle Lake District Airport.
- Stobart Energy - Is the number one supplier of biomass in the UK, sourcing, processing, and supplying fuel to biomass plants under a mix of short and long-term contracts.

Further details about our business can be found at www.esken.com

Esken. We go further.

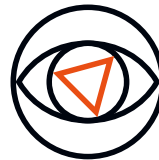


Our values



01 Take care

- We're committed to keeping ourselves and others healthy and safe. Every day.
- We focus on total wellbeing and a people first approach.
- We are trusted to keep our word and be fair and ethical.
- We are committed to being socially and environmentally conscious.



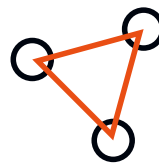
02 Always improve

- We always find ways to delight our customers.
- We strive to learn more and keep evolving.
- We thrive on new ideas and new thinking to make our business better.
- We never settle.



03 Own it together

- We are courageous and look for possibility where we can.
- We're proactive, agile and flexible.
- We take pride in our can-do attitude.
- We deliver 'great' every time, together.
- Service, quality and success matters.



04 Stay connected

- We look after each other and show respect for our communities.
- We find connections and work as one team.
- We're open-minded, honest and straight talking.
- We listen to understand.

Expectation for suppliers

Esken is an equal and fair business and expects everyone who works with us to share our values and embrace responsible business practices. As such, we expect our suppliers to comply, as a minimum, with all applicable laws in their country/countries of operation and with all applicable industry standards.

We also expect them to have written policies and procedures to demonstrate their commitment to and to assist in compliance with the requirements of this Code.

We expect our suppliers to treat our colleagues and service partners with fairness and respect, in return we expect our colleagues and service partners to treat our suppliers in the same manner.

Esken believes that sharing the same values and principles will allow us to work together proactively to achieve great quality in our mutual end goals.

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Human rights

No Child Labour

Children under the age of [15] should not be employed by our suppliers.

Young workers under 18 must not be employed at night or in hazardous conditions and all policies and procedures relating to the employment of young workers must conform to International Labour Organization standards.

To ensure that these principles are applied appropriately, all workers must provide valid identification documents to verify their age.

All employment to have been freely chosen by each employee

Workers must be free to choose their own employment. There must be no slavery, servitude, forced labour or human trafficking.

Esken has a zero-tolerance approach to modern slavery, and we are committed to tackling modern slavery throughout our supply chains.

Wherever we work we ensure that nobody is exploited, we expect suppliers to share this commitment. This means Esken will refuse or cease to do business with any individual, company or organisation that fails to uphold the standards and principles of basic human rights.

Reasonable Working Hours

All working hours should comply with national laws and workers should not be required to work more than 48 hours a week on a regular basis and must be given, on average, at least one day off in every seven.

Overtime (time worked in addition to the worker's normal working hours) should be voluntary and should be compliant with national laws.

Managers should honestly record hours worked for both hourly and piece-rate workers.

Regular Employment

All work should be on the basis of recognised employment relationships established through national law.

Obligations to workers under laws and regulations should not be avoided through the use of labour-only contracts, sub-contracting, home-working arrangements, apprenticeships where there is no intention to provide skills training or regular employment, or through excessive use of fixed-term contracts.

Agency Workers' Rights

Where it is necessary to recruit workers, who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged. Where workers are sourced to be employed directly, only reputable recruitment agencies shall be engaged. All such agencies must have the necessary licences and registrations under local laws; agree to adhere to this Code of Conduct; and agree to be audited to ensure their compliance with this Code of Conduct.

All agencies must be engaged under terms which outline the basic agreement, responsibilities, and obligations on both sides.

Agency workers shall all be treated in line with national laws and must always be treated with fairness and respect.

Health and Safety

Suppliers are expected to provide a safe and hygienic working environment and so far as possible, take adequate steps to prevent accidents and injury to health.

Workers must be given regular and recorded health and safety training, and this should also be provided for new personnel and workers who are changing jobs.

There must be access to clean toilet facilities, potable water and, where appropriate, sanitary storage for food. Accommodation, where provided, must be clean, safe and meet workers' basic needs. It must be housed separately from production facilities.

Employers must give responsibility for health and safety to a senior management representative and support a 'safety first' culture.

Particular attention must be paid to fire alarms and the safety of buildings, chemicals and machinery, and workers must not be put at risk through excessive hours and inadequate rest periods.

Where applicable, adequate, and sufficient Personal Protective Equipment must be provided to safeguard the worker to undertake the work safely.

Protection from Abuse and Discrimination

Esken believes that all of its colleagues, suppliers and other third parties have the right to respectful treatment.

Discrimination

Esken takes a zero-tolerance approach to any and all kind of discrimination. To this end there must be no discrimination by any supplier in recruitment, pay, training, promotion, termination of employment or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political affiliation.

Abuse

Physical discipline or abuse, the threat of physical abuse, verbal abuse, sexual or other forms of harassment or intimidation is never to be permitted or tolerated.

Legal and Ethical Business Practice

Esken expects that its suppliers shall conduct their businesses in accordance with all applicable legal requirements in the countries in which they operate.

Suppliers shall:

- Comply with the UK Bribery Act and/or any other applicable local anti-bribery or corruption legislation
- Not engage in anti-competitive practices in violation of local competition or antitrust laws
- Respect the intellectual property rights of others
- Protect the confidential or proprietary information for all Esken group companies and abide by data privacy legislation applicable
- Suppliers shall have written policies prohibiting these behaviours

Environment

Esken is committed to safeguarding the environment and promptly addressing any situation that results in the unauthorized discharge or emission of pollutants into the air, ground, or water and expects our suppliers to commit to protect the environment. In their operations, suppliers should minimize adverse (and potentially adverse) effects on the community, environment, and natural resources by following these requirements:

Environmental Permits and Reporting

Suppliers maintain all required environmental permits, approvals, and registrations and keep current their operational and reporting requirements.

Pollution Prevention and Resource Reduction

Suppliers reduce or eliminate at the source waste of all types, including water and energy, by practices such as modifying production, maintenance, and facility processes; materials substitution; conservation; and recycling and reusing materials.

Hazardous substances

If released into the environment, suppliers identify and manage hazardous chemicals and other materials to ensure their safe handling, movement, storage, use, recycling and reuse, and disposal.

Wastewater and solid waste

Suppliers characterize, monitor, control, and treat wastewater and solid waste as required before discharge or disposal.

Air emissions

Suppliers characterize, monitor, control, and treat air generated from operations as required before discharge.

Where appropriate, we encourage suppliers to seek product certifications to prove and validate their sustainable practices.

Esken is committed to safeguarding the environment and promptly addressing any situation that results in the unauthorized discharge or emission of pollutants into the air, ground, or water and expects our suppliers to commit to protect the environment.

Supply Chain Compliance

We expect our suppliers to encourage their suppliers to adhere to the standards upon which this Supplier Code is based, as part of fulfilling their contractual obligations.

Suppliers shall provide any information reasonably requested by Esken to demonstrate compliance with this Code and their ethical approach to sustainable supply chain practices.

Esken reserves the right to terminate contracts in the event of material breach of the principles set out in this Supplier Code.

