

This Code of Conduct (the “Code”) sets out expected standards and obligations applicable to Helical plc’s (“Helical”, “us”, “our” or “we”) Suppliers. It supports corporate sustainability, promotes safe and fair working conditions and responsible management of issues relating to health and safety, people, ethics, legal compliance and sustainability.

Helical observes the ten principles of the UN Global Compact which cover human rights, labour, the environment and anti-corruption. This Code is written to support those principles.

The Code is intended to assist our Suppliers in recognising and managing ethical risk. It outlines our expectations as to how our Suppliers will operate. While the Code is not intended to replace, supersede or conflict with any express contractual obligations, or any applicable legal and/or regulatory requirements, it is expected that all Suppliers working with Helical will comply with the spirit of the Code across all markets and jurisdictions within which that Supplier operates. We appreciate that this Code will apply to Suppliers in different ways dependent on the nature of their business. As such, where appropriate, Helical will work with Suppliers to adapt the requirements contained therein.

Suppliers are expected to have proportionate management systems in place that allow them to demonstrate their compliance with the Code. Helical reserves the right to require Suppliers to demonstrate their compliance with the Code from time to time.

For the purpose of this Code “Supplier” includes, where relevant, contractors, consultants and agents (and subcontractors appointed by a Supplier) who act for or on behalf of Helical.

### **Compliance with this Code**

Our Suppliers shall comply with this Code, all relevant laws, regulations and standards in all of the countries in which they operate. In particular, we expect our Supplier to adhere to the International Labour Organisation (“ILO”) Declaration on Fundamental Principles and Rights at Work.

If any part of this Code conflicts with any part of the contractual terms agreed between us and our Suppliers (for work carried out for or on our behalf), the contractual terms shall prevail.

We encourage Suppliers to take all reasonable endeavours to communicate and promote this Code to their own suppliers and subcontractors.

### **1. Health & Safety**

Our Suppliers are expected to observe the following responsibilities related to Health and Safety:

- 1.1. Suppliers shall comply with all relevant Health and Safety legislation and comply with industry specific standards and codes.
- 1.2. We require our Suppliers to understand and comply with our Corporate Health and Safety Policy. We also encourage our Suppliers to maintain membership with at least one SSIP (Safety Schemes in Procurement).
- 1.3. In addition, Suppliers are expected to:
  - ensure mechanisms are in place to ensure that Health and Safety obligations are communicated and applied to parties under their control – including ensuring that employees have adequate Health and Safety information and training (and where appropriate, are in possession of a valid Construction Skills Certification Scheme (“CSCS”) card);

- avoid using materials that may be harmful to health, either during their manufacture, use or disposal;
- make use of method statements and/or risk assessments for both routine and ad-hoc activities;
- have public liability insurance in place;
- ensure that they have adequate occupational health services to ensure the health and wellbeing of their employees (proportionate to the size and nature of their business);
- review the Health and Safety standards of subcontractors before employing them to work at our development sites, properties or offices;
- have systems and training in place to prepare for and respond to accidents, health problems and foreseeable emergency situations; and
- have the means and procedures in place for recording, investigating and implementing learning points from accidents and emergency situations.

## 2. People

All Suppliers are expected to observe the following people related requirements:

### 2.1 Forced Labour

- Suppliers shall not use any form of forced, bonded or compulsory labour, slavery or human trafficking.
- Suppliers shall not withhold payment, place debt upon employees or require employees to surrender any government-issued identification, passports or work permits as a condition of employment.
- Supplier employees shall be entitled to terminate their employment by giving reasonable notice and shall be free to leave work after the expiry of that reasonable notice period.
- All employment associated with the Supplier shall be voluntary.

### 2.2 Child Labour

- Suppliers shall prohibit the use of child labour in all circumstances and shall not employ any person below the minimum legal age for employment.
  - In accordance with the International Labour Organisation conventions, the minimum age for admission to employment must not be less than the age for completing compulsory schooling, and in any case not less than 15 years. Lower ages are permitted for transitional periods – in countries where economic and educational facilities are less well-developed the minimum age for regular work generally is 14 years, and 12 years for “light work”.
  - The minimum age for hazardous work is higher, at 18 years, for all countries.

### 2.3 Freedom of association and collective bargaining

- Suppliers’ workers will be free to exercise their legal rights to form, join, or refrain from joining organisations representing their interests as employees. No worker will be subject to intimidation or harassment in his or her peaceful exercise of these rights. The workers’ right to collectively bargain will be respected.

- In situations where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations, Suppliers are expected to allow alternate forms of worker representations.

## 2.4 Working Hours

- Helical recognises the need for a healthy balance between work and free time.
- Suppliers are expected to ensure that the working hours of their employees do not exceed the maximum number set by local law.
- Suppliers are expected to monitor the working hours of their employees to ensure that they do not breach legal requirements.

## 2.5 Wages and Payment

- Suppliers are expected to pay their employees at least the minimum wage required by local law and provide all legally required employee benefits.
- Suppliers are encouraged to pay their employees the voluntary Living Wage or, for employees living in London, the London Living Wage.

## **3. Ethics and Legal Compliance**

All Suppliers are expected to observe the following requirements relating to ethical working and legal compliance:

### 3.1 Ethical working practices

- Suppliers are expected to have procedures in place to ensure that they do not enter into unfair practices to compete for our business. To this effect, Suppliers are expected to observe Competition and Anti-Trust laws and regulations.
- Suppliers are expected to make purchasing decisions based on objective criteria, e.g. pricing and delivery.

### 3.2 Anti-Bribery and Corruption

- Suppliers are expected to adopt a zero-tolerance approach to any form of bribery and corruption.
- Suppliers shall not enter into any bribery activities, including improper offers or payments to or from employees, customers, suppliers, contractors, other organisations or individuals.
- Suppliers shall not give, promise, receive or request any bribes (financial or other advantage) including, but not limited to, in connection with public official relations.
- Suppliers shall have in place an Anti-Bribery and Corruption policy, communicated to their employees and associated persons.

### 3.3 Fraud and Money Laundering

- Suppliers shall act in accordance with all applicable international standards and laws on Fraud and Money Laundering.

- Suppliers shall not do, or omit to do, anything likely to cause any party to be in breach of any such international standards and laws.
- Suppliers shall have in place appropriate Anti-Fraud and Anti-Money Laundering policies and procedures, communicated to their employees and associated persons.

### 3.4 Anti-Facilitation of Tax Evasion

- Where appropriate, Suppliers shall act in accordance with all applicable laws and regulations relating to the Facilitation of Tax Evasion.
- Suppliers shall have in place reasonable policies and procedures to prevent the Facilitation of Tax Evasion, communicated to their employees and associated persons.

### 3.5 Data Protection

Suppliers are expected to act in accordance with all applicable Data Protection laws and regulations in relation to their use, processing and storage of personal data.

### 3.6 Whistleblowing

- Suppliers are expected to have internal complaints, work grievance and whistleblowing procedures in place in accordance with applicable laws and regulations.

## 4. **Sustainability and the Environment**

All Suppliers are expected to support Helical in the successful delivery of its sustainability strategy “Built for the Future” and its commitment to become a net zero carbon business by 2030. All Suppliers are expected to observe the following responsibilities related to Sustainability and the environment:

### 4.1 Engagement with the community

- Suppliers are encouraged to support local community initiatives in the surrounding areas in which they operate, where possible.
- Suppliers are encouraged to develop positive relationships with stakeholders in their local communities.
- Suppliers are expected to plan to minimise any disruption arising from their operations.
- Where appropriate, Suppliers are encouraged to take a proactive approach in offering local communities and local businesses opportunities to work and engage with their operations.
- Development contractors on our larger schemes are expected to participate in the Considerate Constructors Scheme.
- Suppliers are encouraged to offer local employment and apprentice opportunities.

### 4.2 Environmental management

- Suppliers are to have robust environmental management policies and procedures in place which are appropriate to the nature and scale of their business.
- Suppliers shall comply with all relevant and applicable environmental legislation and standards.

- Suppliers shall obtain, maintain and keep all necessary environmental permits, approvals and registrations to carry out their operations.
- Suppliers are expected to consider their impact on the environment during the performance of their work for and on behalf of Helical.
- Suppliers are encouraged to minimise their energy and resource consumption (and ultimately Helical's consumption of the same) through considered design, selection of materials and construction, development and refurbishment techniques.
- Suppliers are encouraged to review their supply chains to ensure their products and services are sourced from responsible suppliers/providers.
- Suppliers shall observe all applicable laws, regulations and customer requirements relating to the prohibition or restriction of specific substances. We expect our Suppliers to identify and manage hazardous chemicals, and other materials in products, included in the Substances of Very High Concern List of the REACH regulation (Registration, Evaluation, Authorisation and Restriction of Chemicals) to ensure their safe use, recycling/reuse or disposal. We expect our Suppliers to avoid the use of such materials where possible.
- Suppliers shall observe all international standards and applicable laws relating to hazardous air pollutants and emissions.
- Suppliers shall promptly report, to us, any known non-compliance with environmental laws and regulations, which occur in connection with work carried out for or on behalf of Helical. This could include issues relating to nuisances such as noise, dust, odours, spillages or fly-tipping, contaminated waste and uncontrolled emissions to the air.
- Suppliers are encouraged to promote recycling and reduce wastage in materials sourcing, handling, transport and disposal.
- Suppliers are encouraged to promote energy and carbon efficiency where appropriate.
- Suppliers are expected, when required, to provide robust data to support carbon and energy consumption calculations.

Last approved by Board on the 11 February 2026.