



Supplier code of conduct



Overview

Portman Dental Care's Supplier Code of Conduct ("Code") describes our corporate responsibility requirements from our suppliers ("Suppliers") that provide products or services to Portman Dental Care. Portman Dental Care requires suppliers and their employees to commit to this Code as a condition of doing business.

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Key expectations

Employment standards and human rights

Child labour

Portman Dental Care is opposed to the use of any form of child labour or practices that inhibit the development of children. Suppliers must comply with all child labour laws and should not employ anyone under the age of 15, or where it is higher, the mandatory school leaving age in the local country.

Forced or involuntary labour

Suppliers must not participate in human trafficking; use forced, involuntary, or slave labour; or purchase materials or services from companies using forced, involuntary, or slave labour. They must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.

Compensation and working hours

Suppliers must comply with the applicable wage and hour labour laws and regulations governing employee compensation and working hours. Suppliers should conduct operations in ways that limit overtime to a level that ensures a humane and productive work environment.

Diversity and equality

Suppliers should aim to provide equality of opportunity and treatment regardless of race, colour, gender, religion, nationality, sexual orientation, age, or disability. Suppliers are expected to support equal pay for work of equal value. Suppliers must oppose discrimination or intimidation towards employees including all forms or threats of physical and psychological abuse.



Ethics and integrity

To meet social responsibilities, suppliers are required to conduct business in an ethical manner and act with integrity.

Business integrity

Suppliers shall not practice or tolerate any forms of corruption, extortion or embezzlement. Monitoring and enforcement procedures shall be implemented to ensure conformance. Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted, including any money, object of value or preferential treatments. These requirements are in addition to more specific obligations in respect of responsible business and anti-bribery included in the contractual terms of business or supply agreement(s) with Portman Dental Care.

Sourcing conflict-free minerals

Suppliers are required to eliminate the use of conflict minerals. Portman Dental Care will continue to promote responsible mineral sourcing and expect suppliers to communicate our conflict-free policy with next-tier suppliers. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customer upon customer request.

Disclosure of information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

Fair business and competition

Suppliers shall uphold all standards of fair business, advertising and competition, including all laws and regulations.

Whistle-blower protection and anonymous complaints

Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Suppliers shall protect whistle-blower confidentiality and prohibit retaliation.



Health and safety

Portman Dental Care's suppliers will make proper provision for the health, safety and welfare of their people, visitors and contractors and those in the community who may be affected by their activities. A safe and hygienic working environment should be provided and best occupational health and safety practice promoted, bearing in mind the prevailing knowledge of the industry, and of any specific hazards.

Environment

Suppliers are expected to conduct their operations in a way that minimises the impact on natural resources and protects the environment, customers, and employees. They must ensure their operations comply with all laws related to air emissions, water discharges, toxic substances, and hazardous waste disposal. Suppliers must maintain sufficient knowledge of input materials and components to ensure they were obtained from permissible sources, in compliance with laws and regulations. Suppliers may be required to validate this origin.



Proprietary information and IP

Any information, personal data, technology, know how or IP that suppliers receive, or have access to, through dealings with Portman Dental Care must be kept confidential and never used for personal gain or outside of the scope of supplier's assignment with Portman Dental Care. This includes both commercial and technical information. Appropriate non-disclosure or confidentiality agreements are and will continue to be used to formalise the process of protecting proprietary information. Refer to the contractual terms of business or supply agreement(s) with Portman Dental Care or existing non-disclosure agreements for details on obligations relating to proprietary and confidential agreements.

Suppliers may not use the Portman Dental Care trademark, images, or other materials to which Portman Dental Care owns the copyright, unless explicitly authorised.

Suppliers shall have an ongoing process to create and maintain documents and records to ensure regulatory compliance, to enable audit where appropriate, and conformity to the Code and the contractual terms of business or supply agreement(s) with Portman Dental Care.

Management commitment

Portman Dental Care believes that sound management systems and commitment is the key to enriching the social and environmental well-being of our supply chain. Portman Dental Care holds suppliers accountable to this Code and all of its standards and suppliers are required to fulfil the expectations set forth by allocating appropriate resources to fulfil the requirements described. Suppliers shall implement or maintain, as applicable, a management system that facilitates compliance with this Code and with the law, and identifies and mitigates related operational risks while facilitating continuous improvement.

Risk assessment and risk management

Suppliers shall have a process to identify the environmental, health & safety and labour practice and ethics risks associated with their operations. The process shall determine the relative significance of each risk and the implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

Continuous improvement

Suppliers are expected to continuously improve their performance in general and by implementing appropriate measures to help them comply with labour, health and safety and environmental standards required by this Code. Suppliers shall have a process for timely correction of deficiencies identified by assessments, inspections, investigations and reviews undertaken by themselves or other third-parties.

Supplier responsibility

The Supplier will be responsible for cascading this or a similar policy through their supply chain as appropriate. As a minimum the policy should maintain the levels of corporate responsibility described in this document.

Communication

Suppliers are expected to assist Portman Dental Care in enforcing this Code by communicating its principles to their supervisors, employees, and suppliers.

Any supplier may direct questions or comments about this Code to Portman Dental Care Head of Procurement.

Note: Violations of the Portman Dental Care Supplier Code of Conduct should be reported in confidence to the Head of Compliance, Portman Dental Care, Rosehill, New Barn Lane, Cheltenham GL52 3LZ, England or the Portman Dental Care Head of Procurement, Rosehill, New Barn Lane, Cheltenham GL52 3LZ, England.

