



Three Ireland (Hutchison) Limited

Supply Partner Code of Conduct



Document Control

Version History

Version	Date	Change Description	Author
1.0	11.10.2021	Draft for internal review	Procurement
1.1	14.10.2021	Brand amends	Marketing
1.2	18.10.2021	Content amends	Procurement
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2.0	12.05.2022	Content amends	Procurement



About Us

Our Group Structure and Business

Three is Ireland's largest mobile telecommunications provider with 39% market share and 2.9 million customers (as of September 2021).

Our network is built for data; with 99% 4G coverage, and we carry over half of all mobile data on our network, that's more than all other operators combined. Three's 5G network is available to customers in every county.

Three has to date invested close to €2 billion in building our business in Ireland. This includes a €700 million investment in upgrading and expanding our network and in Three's digital transformation, which will deliver a cutting-edge experience for both our customers and our employees.

Annually, Three continues to invest over €100 million into our business to ensure we continue to deliver the best network, experience and service for our customers.

At Three we strive to provide our customers with a better connected life through meaningful products, best in class service and a connected network experience.

Three is part of CK Hutchison Holdings Limited (CK Hutchison), a multinational conglomerate which employs over 300,000 people in around 50 countries and is listed on The Stock Exchange of Hong Kong Limited. CK Hutchison has four core businesses: ports and related services, retail, infrastructure, and telecommunications. Three has over 1400 employees throughout Ireland, with our head office in Dublin, our award-winning contact centre in Limerick where our 450-strong team manages 1.4 million calls every year, and 60 retail stores nationwide.

Like all businesses in Ireland, our operations are governed by a wide range of legislation and regulation. As a mobile network operator, we also adhere to specific communications sector requirements.

As a responsible business with suppliers and representatives the world over, we accept that we have a duty to trade responsibly. We therefore want to ensure that those people with whom we deal and in particular our suppliers and our representatives live up to our values and standards and share that responsibility.



Committed to better

Better connectivity, responsibly

“As a major part of Ireland’s critical infrastructure, we take our role within corporate social responsibility very seriously. Whether we’re supporting the communities that need it most. Or nurturing a culture of belonging and respect for our diverse people. Every step we take as a business needs to have meaningful impact on our people and our society. We’re here to provide connectivity every day for every customer. Part of that work is ensuring our suppliers follow the same high standards that we would expect of ourselves. Because every aspect of life needs a big network.”

Robert Finnegan, Chief Executive Officer

Our Three commitments

We’re committed to better: Better connectivity, responsibly. We’re focused on some key areas that we think will help us to conscientiously deliver better connectivity, every day, for every customer. Our framework of principles covers inclusion, environment, and the community.

Three’s values

Our values define the attitudes and behaviours that will help us achieve our vision of better connectivity, every day, for every customer. They are the things that we value and how we get things done to drive our success.

- We focus on the customer
- We go beyond the expected
- We work as one team
- We take responsibility
- We appreciate each other

Applicability

Three’s Supplier Code of Conduct applies to all suppliers providing goods or services to Three. Our expectation is that our suppliers extend our principles set out in the Code to their own employees, sub-contractors’ suppliers and supply chain.

Supplier commitment

We want to work with Suppliers that feel the same about the way they operate. This Supplier Partner Code of Conduct sets out the minimum standards of behaviour and practices we expect from our suppliers.



We use the Code of Conduct's principles when engaging in new relationships and will monitor how suppliers live up to them throughout the life of the contract.

There may be additional requirements subject to the goods and services provided that we will clearly communicate as part of individual sourcing requirements.

We expect all our Suppliers to comply with laws, legislation, regulations, and directives relevant to its business practices.

Compliance & Ethics

Anti-Bribery & Corruption

We are committed to conducting business with a high level of integrity, and do not tolerate any form of bribery or corruption, including embezzlement, money laundering, kickbacks, extortion, fraud, nepotism (family) or cronyism (friends).

What does this mean for you?

- You conduct business with integrity, and you likewise do not tolerate any form of bribery or corruption.
- You never request, accept, pay, offer, or authorise bribes, either directly or indirectly, under any circumstances. This includes never seeking to improperly influence or bribe an employee, customer, or public official (including foreign public officials) or any other individual or entity.
- You do not offer or make facilitation payments, nor do you permit others to offer or make such payments on your behalf. Facilitation payments are bribes – often small – paid to public officials to speed up non-discretionary bureaucratic processes and access services to which the payer is lawfully entitled.
- You will ensure your Associated Persons are aware of your own anti-bribery policies and procedures.
- You will maintain and enforce your own anti-bribery policies and procedures, which are compliant with the Criminal Justice (Corruption Offences) Act 2018.

Gifts and Hospitality (“Business Courtesies”)

Business gifts and hospitality are customary and often part of building goodwill among business partners. However, it is possible that a problem may arise when such courtesies compromise, or appear to compromise, the ability of Three employees to make objective and fair business decisions. Three maintains records of any business courtesies given and received or offered and rejected. The record states the nature, purpose, value (if known) and date of the Business Courtesy, and also details of the giver/receiver of the Business Courtesy.

Employees are forbidden from paying for business courtesies personally as a means of evading the requirements of the Policy.



What does this mean for you?

Suppliers should avoid offering any gift, gratuity or hospitality that might be perceived to unfairly influence a business relationship should be avoided. Business Courtesies must comply with the following principles at all times:

- they must be reasonable and not excessive;
- they must be of modest value, both in isolation and when considered in the context of other gifts and hospitality offered to the same recipient;
- they must be appropriate and consistent with reasonable business practice;
- they must be provided with the intent only to build or maintain a business relationship or offer normal courtesy, rather than to influence the recipient's objectivity in making a specific business decision;
- they should never be offered in return for personal or financial gain; and
- they must be permissible under all applicable laws, rules, and regulations.

In determining whether a specific business courtesy lies within the bounds of acceptable business practice Suppliers should consider the following:

- the total value of any business courtesy received from the Supplier cannot exceed €150. Any gift of a higher value offered will be refused;
- the Three employee receiving the business courtesy will require formal approval from their Functional Director prior to acceptance;
- employees will forward all gifts received as part of generally accepted business practice during Christmas period to Three's PR Team to be raffled on behalf of charity or raffled throughout the business in the event that the gift is received after the charity raffle has been performed.

Conflicts of Interest

We avoid Conflicts of Interest where possible but where they could arise, they will be declared as soon as possible.

What does this mean for you?

- Avoid Conflicts of Interest where possible but when unavoidable its essential that this is dealt with in an open and honest way.

Safeguarding Information

We protect our technology, intellectual property and commercially sensitive and confidential information from access that's not authorised.



What does this mean for you?

- You must ensure that information received in relation to our people and our customers is kept confidential and secure.
- If any issues arise, you must report them to us as soon as possible.

Accurate Business Records

We ensure that all our records are accurate, up to date and maintained. We don't tolerate any financial misconduct.

What does this mean for you?

- You must maintain accurate and complete business records.
- You must ensure you have the financial controls in place to manage financial risks

Tax Evasion

We don't tolerate any form of financial misconduct including fraud, tax evasion and money laundering.

What does this mean for you?

- You must be alert to being asked to follow processes that are outside of the normal procedures.
- You must ensure all documents and invoices provide a true and accurate position as to what has been agreed.

People

Human Rights

At Three we believe all are entitled to basic rights and freedom, wherever they live and whoever they are. We support recognised global human rights and fair working conditions for persons working on our projects, in our workplaces, and in our supply chain.

What does this mean for you?

- You do not allow any practice that would restrict free movement of employees. Such practices can include requiring that employee's hand over identification documents, passports or work permits as a condition of employment.
- You shall not engage in any slavery, servitude, forced or compulsory labour and/or human trafficking.



Modern Slavery

No form of Modern slavery is acceptable in Three or those that we work with or on our behalf.

Physical abuse or discipline, the threat of physical abuse, sexual or other forms of intimidation are prohibited.

We have zero tolerance for any form of human trafficking or child, forced or compulsory labour, including such practices as the unlawful or illegitimate withholding of wages.

What does this mean for you?

- Your workforce can thrive in their job without fear of any unjust treatment.
- You shall respect and promote the ILO's Fundamental Principles and Rights at Work:
 - the freedom of association and the effective recognition of the right to collective bargaining.
 - the elimination of forced or compulsory labour.
 - the abolition of child labour; and
 - the elimination of discrimination in respect of employment and occupation.
- You have zero tolerance for any form of human trafficking or child, forced or compulsory labour, including such practices as the unlawful or illegitimate withholding of wages, retention of workers' original identity documents, or requirements for workers to pay recruitment or any such other fees in relation to their employment.
- You must not employ anyone under the age of 15 or, below any higher minimum age specified by local law.
- Suppliers shall ensure that working hours are in compliance with local laws and ILO standards.
- Suppliers shall abide by any legislation governing minimum wage payments, and where none is available, ensure that salaries are commensurate with experience and industry standards
- You'll maintain and enforce your own anti-slavery and human trafficking policies and procedures.
- Ensure your Associates are aware of your own anti-slavery and human trafficking policies and procedures.

Freedom of association and collective bargaining

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.



What does this mean for you?

- You recognise and respect employees' right to freedom of association and collective bargaining, where permissible by law.

Health & Safety

Three is committed to operating a safe and healthy environment. We also work with our contractors and suppliers ensuring they train their staff and have policies and procedures to ensure they are safe and do not affect the health and safety of our staff and customers.

What does this mean for you?

- You must as a minimum comply with all relevant health, safety, welfare and wellbeing legislation and guidance and be able to demonstrate this by providing where required documentation to Three.
- Ensure all staff and contractors are competent with relevant training and experience.
- You must ensure work equipment is safe, compliant with statutory requirements and safely used and stored.
- You will consider the health and safety of staff, contractors, members of the public and others affected by work activities ensuring they are safe and healthy at all times.
- You will have a process of assessing sub-contractors where used and supervising and monitoring contractors working on your behalf.
- You will have a robust system of accident reporting and investigation for all accidents, incidents and near misses including detailed accident investigation which will include underlying and root causes of the accidents and improvements thereafter
- The hierarchy of risk controls should be followed at all times to eliminate or reduce risks Where risk elimination cannot be achieved and PPE is selected as a control measure you must ensure the required PPE is worn and other protections are in place to ensure the safety of contractors, Three staff and customers.
- You will provide in a timely manner any required information and safety signs to be posted in clear positions to make people aware of risks.
- You will follow all inductions, toolbox talks or other such instructions and will comply with Three contractor management arrangements including permits to work.
- You will cooperate with Three on all health and safety matters and provide any information requested by Three and others in relation to health and safety

Diversity & Inclusion

At Three we have zero-tolerance towards bullying and harassment in any form. We believe that everyone has the right to be treated with dignity and respect and we do not condone any types of unacceptable behaviour or abuse including harassment, intimidation or bullying of our



customers or our employees. Our policy sets out ways to eliminate unacceptable behaviour or abuse among employees.

Three will thoroughly investigate allegations of behaviour that violates our policy. Complaints by employees or other persons in the workplace of bullying or harassment at work will be treated with fairness, sensitivity, respect and (as far as possible) confidentiality for all parties concerned.

What does this mean for you?

- You do not tolerate disrespectful behaviour, bullying, discrimination, harassment, or unwanted sexual advances and have an appropriate process for dealing with complaints in place.
- You do not discriminate, and you provide equal treatment and opportunities for employees and job applicants.
- You embrace and promote an inclusive culture.
- You are an equal opportunities employer, where individuals are treated equally with dignity and respect and are recruited, employed, promoted, and paid based on merit and skills and not based on their age, disability, race, colour, nationality, ethnic or national origin, religion or belief, gender reassignment, marital or civil partner status, pregnancy or maternity, sex or sexual orientation.
- Comply with the obligations as set out in the Employment Equality Acts 1998-2015
- Your products and services meet accessibility guidelines.

Environmental Protection and Climate Change

We are committed to protecting the environment from harm and limiting the effect our business operations have on the local and global environment. We are committed to a more sustainable future and want to work with suppliers who are also committed to take action on climate change, protect natural resources and promote a circular economy.

What does this mean for you?

- You will comply with all environmental legal requirements and support Three's energy and environmental reporting obligations where required.
- You will undertake reasonable endeavours to minimise the environmental impact of your operations and the goods and/or services provided.
- You will assess and manage climate related aspects and minimise their impact on climate change.
- You are committed to operating a robust environmental management system and supporting Three's environmental and carbon reduction strategy.
- You are committed to improving energy efficiency and increasing the use of energy from renewable sources.



- You are committed to using clean technology and scientific innovation to enable a reduction in environmental impact.
- You will be committed to promote environmental sustainability, protect natural resources and restore biodiversity.
- You will adopt the waste hierarchy principles and regularly review operations and arrangements to identify opportunities to further reduce waste streams.
- You will consider materials lifecycle sustainability and environmental factors during the procurement of equipment, goods and services or during the design, construction or refurbishment of workplace environments.
- You will support Three to adapt products and services to be more environmentally sustainable where applicable.
- You shall promote a circular economy, considering materials lifecycle sustainability and environmental factors during the procurement of equipment, goods or services.
- You shall support Three to adapt products and services to be more environmentally sustainable.

Responsible Sourcing

We are committed to ensuring that no materials are sourced through illegal or unethical practices. That the raw materials entering the supply chains are extracted, produced and processed in a responsible manner is a key condition for us as a responsible company. This also includes ethical labour practices.

What does this mean for you?

- That you can prove the source of your materials used in production is not from a conflict zone or used child labour to be extracted.
- That those responsible for extracting the materials were not subject to human or labour rights violations.
- You will not supply to any member of the Three Group any materials sourced through illegal or unethical practices, which includes any products, components or materials that contain conflict minerals.
- You shall maintain and enforce your own policies and procedures, to ensure you do not purchase any conflict minerals.
- Ensure your Associates are aware of your conflict minerals policies and procedures.



Community

Supporting our communities to help shape a better world

We're empowering communities to get connected, and to make people's lives better. From ensuring that we can use our skills and knowledge to support communities in Ireland and across the globe through our suppliers.

What does this mean for you?

- You shall seek opportunities to contribute to the communities that you operate in, helping to address social issues (such as unemployment, education, health and well-being), by making the most of its ability to provide financial, in-kind and/or skill-based support.
- Where opportunities arise, collaborate on opportunities to support community projects where there is a mutual understanding of the benefit that could arise with doing so.

Your Commitment to Three's Code of Conduct

No PO, no Pay

Three's policy is that no work should commence without a valid purchase order.

Compliance to the Code

We reserve the right to audit supplier conduct against compliance with our Code. We expect our suppliers to keep records to demonstrate compliance and we may request access to such documents at any time.



Definitions

In this Supply Partner Code of Conduct, the terms used refer to the following:

- "Associate" means in respect of each party, any officer, director, employee, consultant, agent, direct or indirect beneficial owner or shareholder or any other party acting on behalf of such party.
- "Supplier" means any supplier to Three or the Three Group.
- "Three" means Three Ireland (Hutchison) Limited a company incorporated in Ireland with registered number 316982 whose registered office is at 28-29 Sir John Rogerson's Quay, Dublin 2.
- "Three Group" means: any entity directly or indirectly controlled by CK Hutchison Holdings Limited, where "control" means (a) the ownership of not less than 25% of the voting rights, (b) the ability to appoint or remove a majority of the board of directors (or equivalent body) or (c) the ability to exercise dominant influence over, or to direct the affairs of, an entity through an agreement or a provision in its articles of association or other constitutional document.
- "ILO" means the International Labour Organisation.