



Our Supplier Code

Pinnacle Group and Subsidiary Companies

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1. Introduction

1.1 Our Supplier Code

Pinnacle's purpose – transforming communities, changing lives – is why we exist. It guides our decisions and actions and encapsulates what we do at Pinnacle every day. It helps motivate and inspire us to deliver excellence.

The purpose of Our Supplier Code is to clarify and safeguard the relationships between us and our suppliers, to establish standards that promote transparency, accountability, and ethical behaviour, ensuring that we operate in the best interests of the customers and communities that we serve.

We will create better outcomes in the right way, not at any cost, in line with our purpose and values.

Please read Our Supplier Code, understand it and follow it.

Our Supplier Code is the benchmark, the standard we all must strive to achieve in everything we do. All of us play an essential role in maintaining a principled and ethical business. This document sets out our expectations on how we can collectively achieve this.

We look forward to working with you to develop a strong and lasting relationship that can benefit both of us, our local communities and our planet.

1.2 Our Supply Partners

Pinnacle¹ ('we', 'our') see our supply partners² ('you') as an extension of our business. Our Supplier Code sets out the behaviours, practices and regulations we expect from our supply partners, and in turn how you can expect us to work in partnership with you to support you as a responsible business.

We strive to work with like-minded businesses and therefore require suppliers to comply with this Supplier Code of Conduct at all times and be able to demonstrate compliance.

Suppliers shall undertake appropriate due diligence of their own supply chains and maintain records demonstrating compliance with applicable legal, ethical, labour, environmental and regulatory requirements. Pinnacle reserves the right to request evidence of such controls as part of supplier onboarding, review or audit activities.

¹ 'Pinnacle' means Pinnacle Group Limited and other relevant group companies.

² 'Supplier' means any organisation or individual that provides goods and/or services to Pinnacle or to any of its clients either directly or indirectly.

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1.3 Our values

Pinnacle is built on [five core values](#) that are at the heart of our way of thinking, doing and seeing. These are:

Respect, Involve, Trust, Challenge and Deliver Excellence

Our people embody the values whether they are with colleagues, clients, customers or suppliers. To ensure everyone receives the same Pinnacle experience, we expect our suppliers to uphold the same standards at all times.

1.4 Supplier Application

The supplier application, submitted via our supplier management portal, will form the basis of our relationship and detail our expectations of partners working in our supply chain. The supplier application includes this Supplier Code and:

- Supplier Onboarding Questionnaires
- [Standard Terms and Conditions](#) or
- [Enhanced Terms and Conditions](#)

These documents may be updated occasionally. Please email procurement@pinnaclegroup.co.uk for the latest versions.

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2. People

Pinnacle is committed to opposing modern slavery in all its forms and preventing it by whatever means we can.

We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business transactions.

Pinnacle is committed to investing in its people and providing a safe, healthy and diverse working environment. We are guided by the UN Sustainable Development Goals and the Modern Slavery Act 2015.

2.1 Equality, Diversity and Inclusion

We embrace diversity and value everyone for their merits, treating each individual fairly and consistently. We expect our suppliers to do the same and ensure that they provide equality of opportunity and treatment regardless of race, colour, gender, religion, nationality, sexual orientation, age or disability.

We want to provide equal opportunities within our procurement process and ensure that diverse suppliers have a fair and equal opportunity to compete for business within our supply chain. We believe that it is important that our supplier base reflects the diversity of our customer base and represents the communities we serve.

Suppliers should actively support supplier diversity and inclusive employment practices and seek opportunities to promote participation from SMEs, social enterprises and underrepresented groups within their own supply chains.

Suppliers shall comply with the Equality Act 2010 and all applicable anti-discrimination legislation.

2.2 Recruitment

If hiring migrant workers, suppliers shall hire directly whenever possible. When the subcontracting of recruitment and hiring is necessary, suppliers shall ensure their labour agencies are certified or licensed by a competent authority to minimise risk of forced labour or trafficking for exploitation.

Workers shall not be charged any fees or costs for recruitment, including costs associated with travel, processing official documents and work visas.

2.3 Working Conditions

Disciplinary policies and procedures should be clearly defined and communicated to all staff.

The workplace shall be free of any form of harsh or inhumane treatment and freedom of movement shall not be unreasonably restricted.

Further, our aim is to provide a workplace free of victimisation, harassment, discrimination or bullying.

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Harassment can take many forms and may not be easy to identify. It involves behaviours that is likely to embarrass, humiliate or intimidate others. We do not tolerate abuse, harassment, bullying or discrimination of any kind and we expect our suppliers to comply with all legal requirements in this area.

2.4 Wages and Benefits

Pinnacle expects suppliers to comply with all applicable legislation on pay and benefits and to support equal pay for work of equal value. All workers shall at minimum be paid the national minimum wage and shall be provided all legally mandated benefits.

Wage payments shall be made at regular intervals, directly to workers and shall not be delayed, deferred or withheld. Clear and transparent information shall be provided to workers about hours worked, rates of pay and the calculation of legal deductions. All workers must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure or to keep workers tied to their employer or their jobs.

2.5 Working Hours

Our suppliers shall comply with all applicable legislation relating to working time, rest periods and leave entitlements. Working hours shall be managed in a manner that protects worker health, safety and wellbeing.

2.6 Forced Labour

Each individual should be free to choose and terminate their employment at any time without penalty (subject to specified notice periods). We expect that our suppliers will not under any circumstances use any type of involuntary or forced labour, including modern slavery or human trafficked labour.

We are firmly opposed to the use of any child labour – we expect our suppliers to comply with all legal requirements in this area.

2.7 Document Retention

Confiscating or withholding worker identity documents or other valuable items (e.g. work permits, passports) is strictly prohibited. The retention of personal documents shall not be used to bind workers to employment or to restrict their freedom of movement.

2.8 Whistleblowing

We expect our suppliers to encourage their staff to raise concerns about inappropriate and dangerous conduct and to make them aware of how to do this.

Suppliers should make their staff aware of the Modern Slavery Helpline, 0800 0121 700, where individuals can report any suspicious activity or seek help and advice in confidence. For more information, please visit: www.modernslaveryhelpline.org.

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3. Business Ethics

Pinnacle is committed to implementing ethical business practices through responsible decision-making, and we expect the same from our Suppliers.

3.1 Fraud, Bribery and Corruption

Our suppliers are expected to maintain proportionate controls to prevent fraud, financial crime and other dishonest conduct within their organisations and supply chains. Any actual or suspected fraud which may affect Pinnacle, its clients or contracts must be reported to Pinnacle without undue delay.

We condemn fraud, bribery and corruption in all its forms, and we will not tolerate it in our business or in those we do business with. From the confines of our working environments, it is sometimes difficult to grasp the scale of the damage that this does to societies. It is not a victimless crime.

We are committed to avoiding all forms of bribery and corruption and complying with associated laws, supporting efforts to eliminate bribery and corruption and we encourage our suppliers, customers and partners to do the same. The UK Bribery Act applies to all Pinnacle business areas. We do not accept bribes or facilitation payments in any form, or gifts or hospitality in cash. Local practices and customs do not create an exception to our approach. Our anti-bribery rules apply equally to any supplier, third party agent or introducer, and appropriate due diligence will be carried out before we engage with any supplier.

Suppliers must not offer gifts or favours to any Pinnacle employee in any situation in which it could improperly influence or appear to influence a decision or independent judgment in relation to the supplier.

We expect our suppliers to maintain effective controls which minimise the risk of bribery and corruption within their organisation and supply chains.

3.2 Anti-money Laundering

Including Anti-Money Laundering, Counter-Terrorist Financing and Sanctions Compliance. We share a legal, regulatory, ethical and social responsibility to protect our customers and clients and others we do business with. We have a zero tolerance to fraud and other dishonest activities.

We will restrict criminal access to our markets and systems and support wider crime prevention. We will work to ensure our products and systems do not:

- Help criminals to launder or hide the proceeds of crime.
- Finance terrorism.
- Facilitate tax evasion.
- Aid and commit fraud.
- Bypass sanctions laws, including trade embargoes, targeted, sectoral and implicit economic sanctions, and travel bans.

Our suppliers must have robust policies and processes in place to support the same.

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3.3 Competition

Free and fair competition is important and the UK has rules and regulations designed to protect this. We believe in competing fairly with our competitors and dealing fairly with customers and suppliers. We comply with all competition laws (also known as anti-trust laws) in markets where we operate. We expect our suppliers to do the same.

3.4 Conflicts of Interest

Should any supplier or supplier employee be a family relation of a Pinnacle employee (or have any other form of personal relationship with a Pinnacle employee) that might represent a conflict of interest, the supplier is expected to disclose this fact to the company.

Suppliers must make Pinnacle aware of any organisational conflicts of interest that could prohibit Pinnacle from pursuing work with the same client.

3.5 Health and Safety

We require our suppliers to actively promote a safe working environment and undertake work in a clean and healthy manner in compliance with all legally mandated standards for workplace health and safety.

We require everyone who works with us or for us to fully understand the health and safety risks of their activities and to apply good health and safety management systems, training and practices in everything they do. No job is ever so urgent that we cannot take the time to do it safely.

3.6 Confidentiality and Data Protection

Suppliers have a responsibility to keep confidential information that they may receive from Pinnacle safe and to make sure it never gets into the wrong hands.

Suppliers shall comply with UK GDPR, the Data Protection Act 2018 and any applicable data protection legislation. Appropriate technical and organisational measures must be maintained to protect information, prevent unauthorised access and manage security risks. Any actual or suspected data breach affecting Pinnacle information must be reported promptly.

3.7 Applicable Laws

Suppliers shall comply with all applicable laws, statutes, regulations, directives and codes from time to time in force.

3.8 Public Procurement Compliance

Where suppliers provide services connected with public sector contracts, they shall comply with applicable public procurement legislation, including the Procurement Act 2023, and associated regulations where relevant.

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Suppliers must promptly notify Pinnacle of any matter which may constitute a mandatory or discretionary exclusion ground under applicable procurement legislation, including fraud, corruption, modern slavery offences, environmental misconduct, professional misconduct or persistent poor performance.

Suppliers shall cooperate fully with requests for information, audit or assurance activities necessary to support Pinnacle's procurement and governance obligations.

3.9 Reputation

We expect suppliers to act in a manner compatible with the spirit of Our Supplier Code and contribute positively to the reputation of Pinnacle.

3.10 Business Continuity Planning

We regularly review our Business Continuity Plans (BCPs) for our key supply chains, ensuring that BCPs are aligned with our requirements. These help to minimise any disruption to the business as part of our risk mitigation strategy, and we expect our suppliers to be looking at the robustness and resilience of their own supply chains and to be open to sharing these BCPs with us at a high level.

Suppliers shall notify Pinnacle promptly of any event which may materially affect service delivery, including cyber incidents, insolvency events, workforce disruption, significant financial deterioration or critical supply chain issues or failures.

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4. Environmental, Social, Governance (ESG)

Pinnacle is a socially conscious and values-led business with a rich history of making a positive difference to the communities we support. Every day our teams deliver exceptional service, go beyond expectations, seek to create social value through our work and focus on operating responsibly and sustainably.

Our four ESG pillars of Our People & Culture, Community Impact, Protect Our Planet and Responsible Business guide our approach to creating long-term value and are an integral part of Our Supplier Code. We expect our suppliers to share these principles and to contribute positively through their actions, behaviours and decision-making.

We encourage our suppliers to support the communities in which they operate by creating employment, apprenticeship, training and skills development opportunities, promoting equality, diversity and inclusion, and supporting local economies wherever reasonably practicable. We also encourage suppliers to consider opportunities to work with SMEs, social enterprises and diverse suppliers as part of their own supply chains.

Suppliers should actively manage their environmental impacts and seek opportunities to reduce carbon emissions, minimise waste, improve resource efficiency and support the transition to a more sustainable future. We recognise that organisations are at different stages of their sustainability journey and encourage continuous improvement and collaboration in achieving shared environmental objectives.

In support of our commitment to responsible business, suppliers may be asked to demonstrate the positive environmental, social and economic outcomes they deliver through their services, including evidence of initiatives, achievements or commitments relevant to their relationship with Pinnacle.

Our aim is to work collaboratively with suppliers to achieve high standards throughout our supply chain and to create lasting social, economic and environmental benefits. We seek partners who share our commitments to safety, integrity, human rights, sustainability and continuous improvement, and who embrace the principles set out in Our Supplier Code.

To find out more about our ESG pillars, commitments and the impact we are making, please read our latest [ESG Impact Report](#).

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5. Performance and Payment

Our aim is to drive excellence throughout our own organisation and to support and influence positively the development of our values in our supply chain.

Where social value commitments, sustainability objectives or improvement plans form part of supplier selection or contractual commitments, Pinnacle reserves the right to request evidence of delivery and monitor performance against agreed outcomes.

5.1 Review

The requirements outlined in Our Supplier Code will be periodically updated to reflect changes in laws, regulations and business standards.

5.2 Performance Levels

To assist with our aims, we expect all suppliers to comply with the obligations in this document and we reserve the right to carry out a performance assessment of the supplier's compliance at any time.

We invite you to report any potential violation of Our Supplier Code by emailing procurement@pinnaclegroup.co.uk. We require suppliers to notify our Procurement team of any failings that would constitute a breach.

5.3 Audit and Termination

Where a supplier review or audit identifies areas of non-compliance, the supplier must implement time-bound corrective actions to lead to compliance.

Pinnacle reserves the right to undertake proportionate supplier assurance activities, including requests for supporting documentation, audits and performance reviews, where considered necessary.

Pinnacle reserves the right to terminate an agreement with any supplier that does not comply with this code.

5.4 Payment Terms

We have a commitment to make payment to our suppliers within 30 days and support the principles of the Fair Payment Code. We expect our Suppliers to make prompt payment to their suppliers to ensure the ongoing economic health of businesses contracted to provide goods and/or services in the supply chain.

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6. Supporting Information

We have several policies³ which underpin our approach to responsible business practice. To further support your partnership with Pinnacle Group, we invite you to review other areas of our Corporate Governance Framework, including:

- [Our Commitment to ESG and ESG Impact Report](#)
- [Modern Slavery Transparency Statement](#)
- [Carbon Reduction Plan](#)
- [Responsible Procurement Policy](#)
- [Section 172\(1\) Statement](#)

³ Our policies are available on request if not published online.