



Supplier Code of Conduct

Working with our suppliers to affect positive change

December 2022

gravitymedia.com



A photograph of tennis player Novak Djokovic celebrating a victory. He is wearing a white Lacoste polo shirt with "BELG" and a logo on the sleeve. He has his fists clenched and a wide smile. The background is a blurred crowd of spectators. The entire image has a blue tint, and the text "CAPTURE CRAFT CREATE" is overlaid in red.

CAPTURE CRAFT CREATE

Introduction

Gravity Media is a global media production, creative service and facilities company.

Built on collaboration, innovation and a network of global talent, we help our partners to optimise their facilities, workflow and content for globally located productions of all types and scale. But this reach comes not only with a responsibility, but also an opportunity, to affect long-term positive change.

We take this responsibility seriously and have set ourselves ambitious environmental, social and corporate governance (ESG) goals, along with a commitment to act with the highest ethical standards that go beyond merely complying with relevant laws.

Our goals and standards not only apply to how we operate internally, but also impact our entire sphere of influence. We know we can only achieve these goals and standards by working in partnership with you, our valued suppliers.

For more information about our ESG goals see:
<https://www.gravitymedia.com/esg/>



We aim to work with you to achieve our standards and goals, by sharing knowledge and striving to continually improve the impact we all have on the wider world.

In this Supplier Code of Conduct (“Code”) a “Supplier” (you) refers to any individual or business that provides us with products or services, including all their employees, agents and subcontractors.

This Code supplements, but does not supersede, any contractual agreement you may have with us. Where a contract does contradict this Code, then the contract will always prevail. Suppliers may also be expected to comply with additional or more detailed policies that would form part of your contract with us.

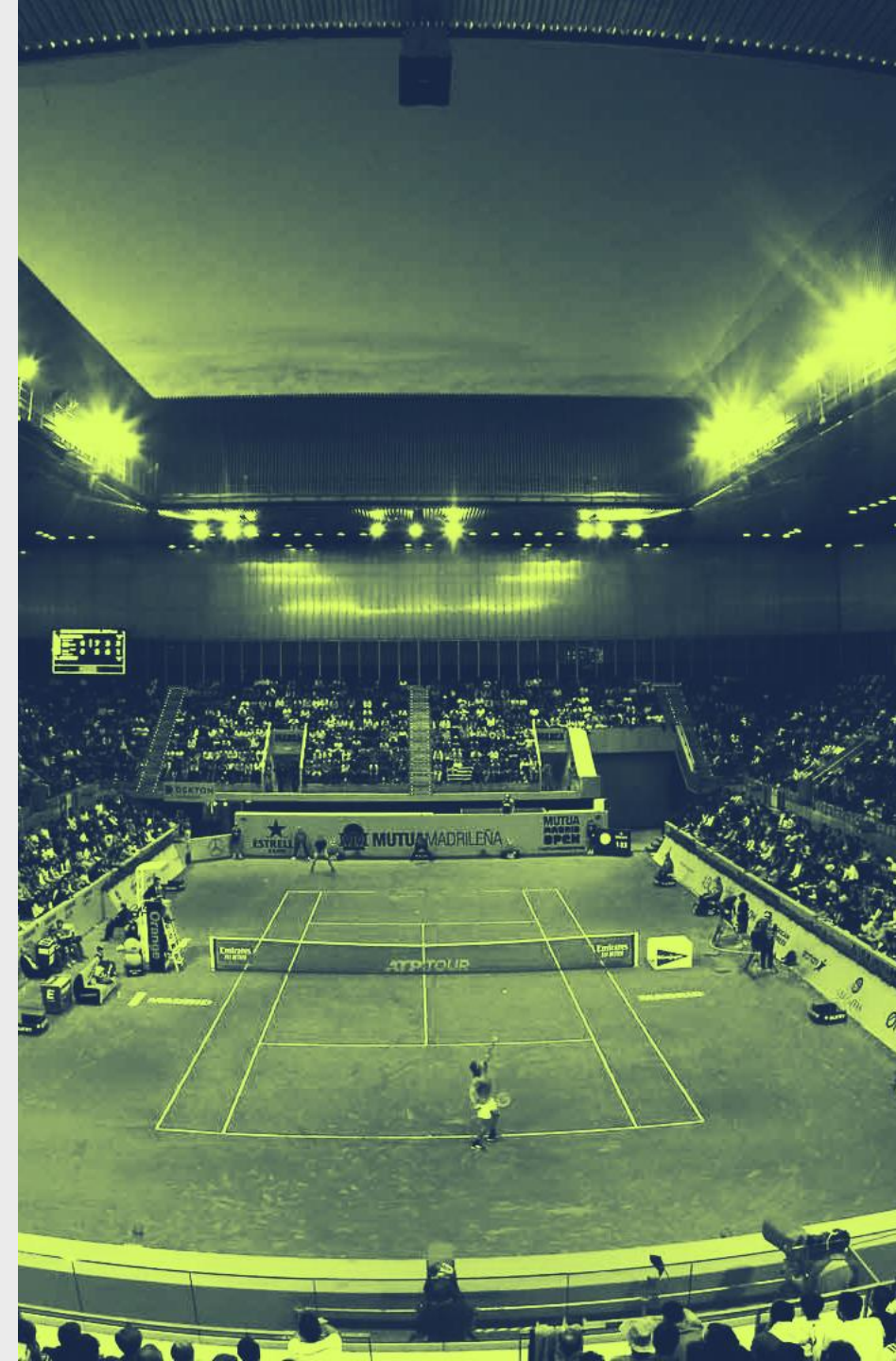
We expect Suppliers to have appropriate controls in place to ensure that you, and your supply chains comply with this Code.

We reserve the right to audit your compliance and take appropriate action if you are found to be non-compliant.

If you have concerns about complying with this Code we encourage you to work with your main Gravity Media contact.

This Code contains a summary of the minimum standards we expect from you across five key areas:

1. Human Rights and labour
2. Diversity and inclusion
3. Environmental sustainability
4. Business integrity
5. Information security



1 - Human Rights and Labour /

What we need:

We expect our suppliers to share our commitment to preventing, identifying and addressing human rights abuses, as defined in the International Bill of Human Rights.

This includes:

- Respecting the human rights of employees and communities affected by operations and supply chains.
- Understanding and addressing actual and potential human rights abuses in operations and supply chains.
- Enabling employees, communities and other affected groups to raise concerns or grievances without fear of retaliation, and in the knowledge that they will be investigated properly and remedied where necessary.
- In particular we expect suppliers to meet our standards for labour and welfare conditions, which can go beyond standards set by local laws and regulations.
- We recognise that in longer global supply chains some human rights abuses can be especially difficult to identify. We are therefore committed to sharing knowledge and working with you to help meet these commitments



Our suppliers will share our commitment to preventing, identifying and addressing:

Modern Slavery

Take steps to understand and address the risk of modern slavery in operations and supply chains. This includes ensuring that employees are not illegal, involuntary, bonded or exploited and are free to terminate their employment without fear of penalty. All employees should be in a recognised employment relationship, as defined by law, and understand the terms and conditions of their employment. No employee should be charged fees for recruitment or be required to lodge deposits, identity or travel documents. If potential victims are found, their safety should be prioritised.

We expect suppliers to notify and work with us to remedy any incidents of modern slavery.

Health and Safety

Take responsibility for ensuring that the working environment is healthy and safe for anyone who may be affected. This includes informing, training and supporting employees so that they can manage their own safety and that of others. In addition to compliance with all relevant regulations and legal requirements, complying with Gravity Media's own risk management processes is also required.

Any health and safety concerns must be raised with Gravity Media immediately.

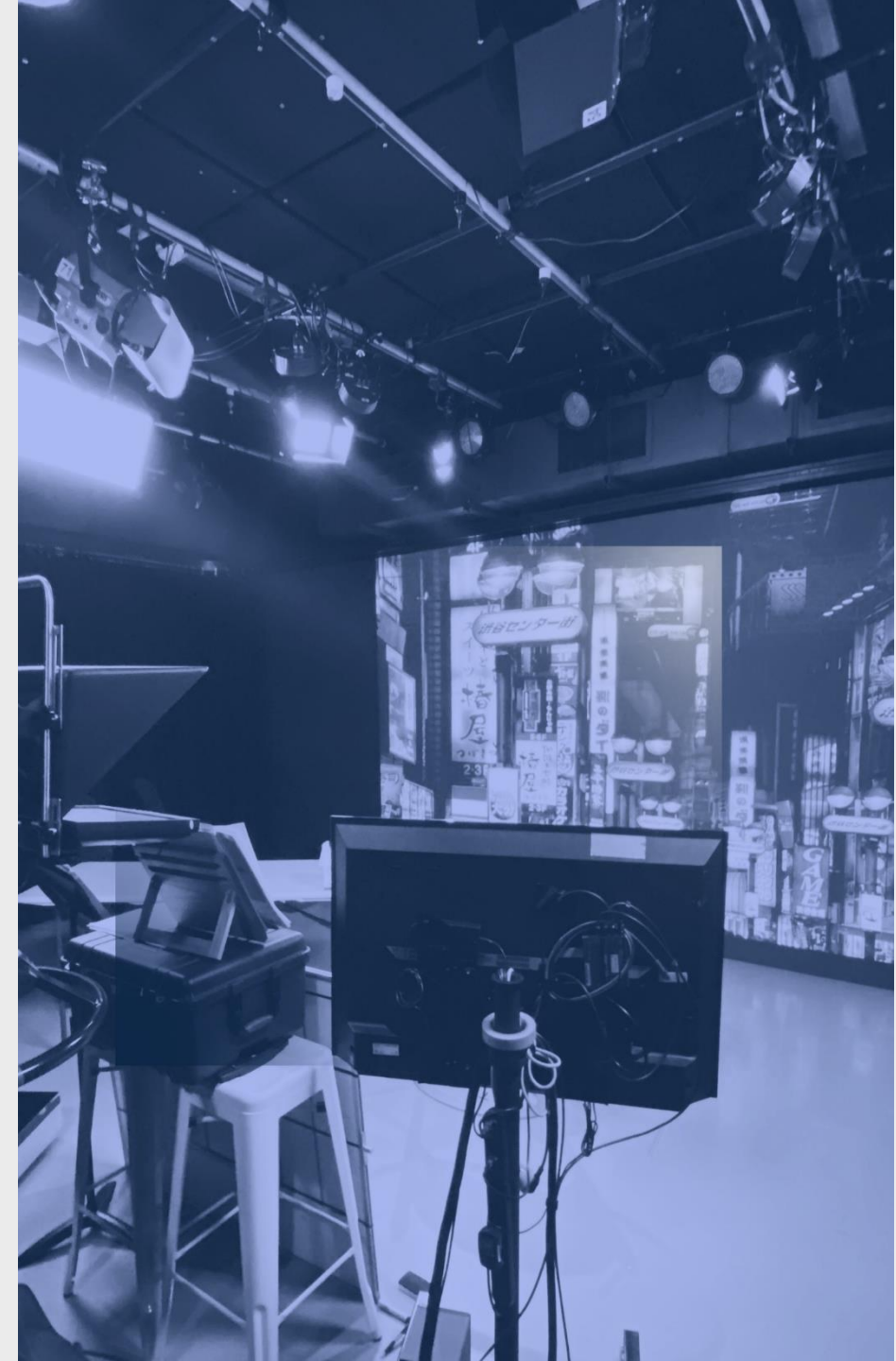
Child labour

Ensure all employees meet the legal minimum age requirements or be at least 16 years of age, whichever is greater (with the exception of children taking part in our productions). Nobody under the age of 18 should be employed to perform hazardous work.

Harassment and abusive behaviour

Operate a working environment that is free from verbal, physical or online harassment and abuse.

Everyone should be treated with courtesy, dignity and respect. Conduct that creates an intimidating, hostile or offensive working environment will not be tolerated.



Our suppliers will share our commitment to preventing, identifying and addressing:

Freedom of association and the right to collective bargaining

Allow employees the right to form or join Trade Unions and to bargain collectively. Where this is restricted or prohibited under national law, suppliers should enable staff to develop alternative ways to express grievances and protect their rights.

Wages and benefits

Compensate employees fairly and equally, without discrimination. This includes paying local living wages, paying overtime above regular rates, prohibiting unfair deductions, taking action to address gender or ethnicity pay gaps and meeting all legal or contractual obligations. In the UK, eligible employees and freelancers should be paid the real Living Wage or real London Living Wage (as set by the Living Wage Foundation). Non-employees such as apprentices, trainees, and anyone who has done work experience for more than 20 days should be paid at least the minimum wage.

Working hours

Ensure the maximum working hours of employees comply with relevant local laws and are not excessive, with all overtime being voluntary and used responsibly.

Mental wellbeing

Put measures in place to address mental wellbeing in the workplace, where it is within their means to do so.



2 - Diversity & Inclusion /

What we need:

Our goal is to reflect the diversity of the communities we serve, regardless of age, race, disability, background, sexuality, gender identity or expression. This applies to our programmes, our workforce and across our supply chains. This is an important goal because we recognise the benefits that diversity brings to our business and the wider world. We want to work with suppliers who also recognise the benefits of diversity and we expect you to provide working environments, practices and policies that are inclusive for everyone.

Our suppliers will:

Equal opportunities

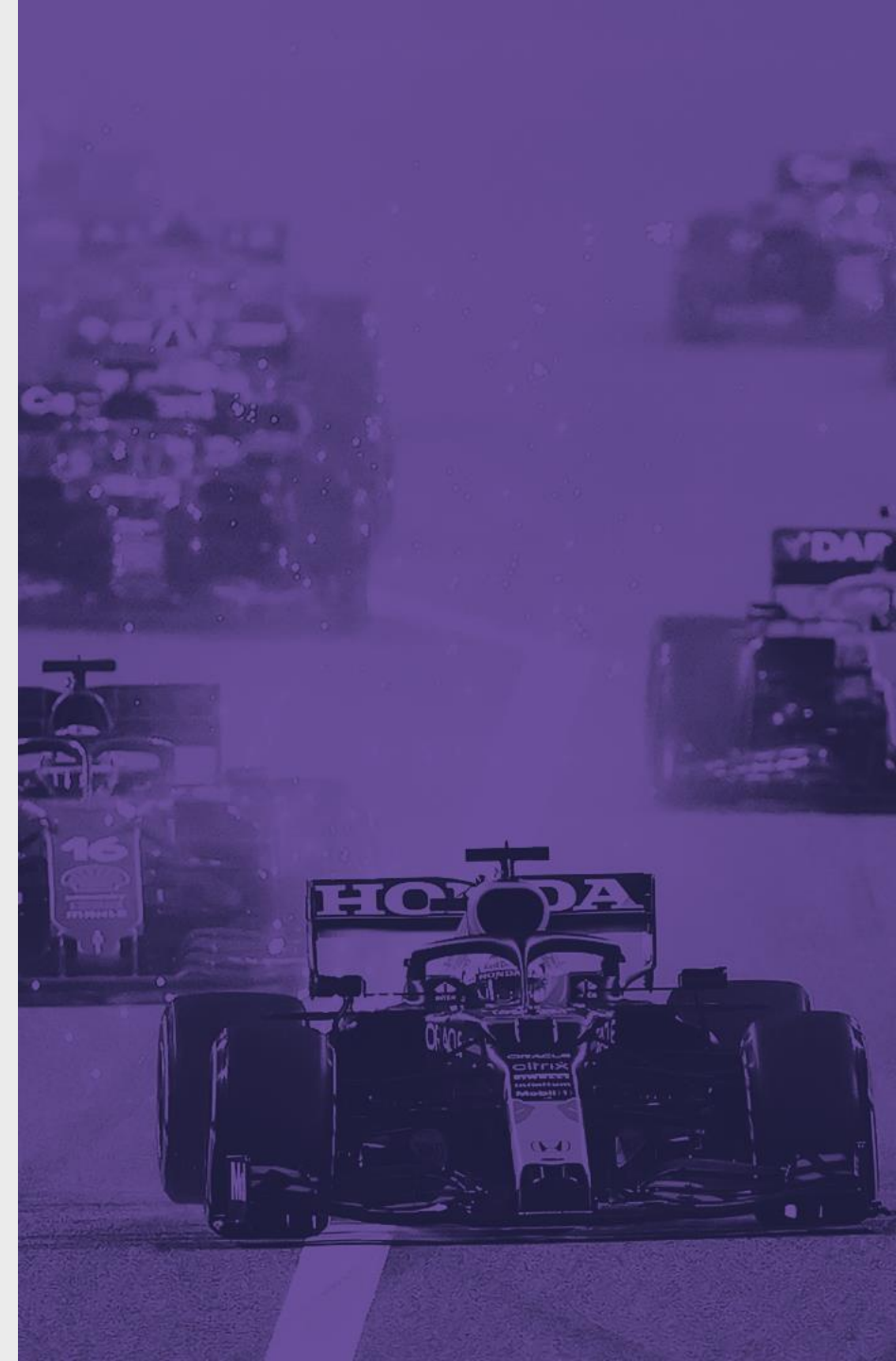
Have policies that enforce the legal requirements of the Equality Act 2010. This should include commitments to diversity and inclusion as well as equal opportunities across pay, working conditions, benefits, maternity/paternity entitlement, pensions, recruitment, training and promotion. Gravity Media will not tolerate discriminatory behaviour by employees or suppliers.

Tracking and reporting

Provide diversity data to Gravity Media to support our tracking and reporting, where appropriate.

Accessibility

Work with us to deliver an accessible supply chain, by complying with accessibility legislation and ensuring the products and services we buy are accessible to our colleagues and consumers.



DIVERSITY &
INCLUSION /

Rise

KICKSTART
SCHEME


future
FRONTIERS

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YOUTH
PROJECT

3 – Environment /

What we need:

We are experiencing a climate crisis and businesses must play their part to help keep our planet within safe warming limits. A significant proportion of emissions in our value chain are from purchased goods and services. We therefore want to work with suppliers that recognise the need for action, and are willing to work with us to create sustainable supply chains and help us achieve our commitment to reduce our carbon emissions and become the sector leaders for environmental, social and corporate governance (ESG).

Our suppliers will share our commitment to preventing, identifying and addressing:

Compliance

Comply with all relevant environmental legislation, regulations and codes of practice. Gravity Media must be notified immediately when any violations are identified.

Target setting and action

Align to our environmental targets and work with us to achieve them. This could include setting science based targets, developing action plans to become net zero by 2030, phasing out single-use plastics, implementing sustainable sourcing practices and using renewable energy sources.

Tracking and reporting

Comply with any environmental reporting requirements and put in place systems to track and report the carbon emissions of their business and supply chain. Any emissions data should also be shared with Gravity Media to support our reporting and tracking of improvement initiatives, where appropriate.





ESG

We started 2022 with a commitment to reduce our carbon emissions and become the sector leaders for environmental, social and corporate governance (ESG).

We currently manage a wide range of ESG factors and are committed to integrating ESG considerations across our entire business operations.

With this aim in mind, we appointed corporate responsibility and sustainability specialists Carnstone. We are working alongside them to develop our existing ESG operations and ensure that they align with our own ambitions and the expectations of our clients, employees and investors.

Find out more [here](#).

4 – Business Integrity /

What we need:

The security of our intellectual property, data and systems is critical to our commercial success. We therefore need our suppliers to respect and safeguard our information by complying with applicable laws and regulations, having appropriate processes and governance in place and working with us to identify and mitigate risks.

Our suppliers will share our commitment to preventing, identifying and addressing:

Privacy and data protection

Comply with local privacy and data protection laws to respect and protect the privacy and personal data of our viewers, customers, talent, contractors and colleagues.

Gravity Media must be notified immediately if anything affects the confidentiality, integrity or availability of personal information (e.g. unlawful destruction, loss, alteration, unauthorised disclosure or access).

Intellectual property

Safeguard our confidential information, trade secrets and intellectual property (including copyrights, trademarks and patents) from unauthorised access and misuse.

System security

Maintain and apply best practice security to safeguard our data, confidential information, trade secrets and intellectual property, along with the integrity and availability of the products or services being provided.

Business continuity

Develop and implement appropriate business continuity plans, covering all operations that support Gravity Media, to minimise the impact of disruption or disaster.



5 – Information Security /

What we need:

It is our policy to conduct business in an honest and ethical way, acting with professionalism, fairness and integrity in all our business relationships. We also take a zero-tolerance approach to bribery and corruption and expect our suppliers to commit to working collaboratively to identify and address any instances when bribery and corruption might occur.

Our suppliers will share our commitment to preventing, identifying and addressing:

Honesty and fair dealing

Always be honest, fair and truthful in all of their dealings with Gravity Media.

Bribery and corruption

Comply with anti-bribery laws and support any additional due-diligence we may undertake to ascertain whether any bribery has taken place in the past or if their anti-bribery programme is adequate. For further support see Gravity Media's Anti-Bribery Policy.

Tax evasion

Comply with all relevant legislation and have controls and procedures in place to prevent tax evasion.

Conflict of interest

Actively avoid any obvious or implicit conflicts of interest and immediately disclose any known or potential conflicts of interest to Gravity Media. Inside information gained through dealings with Gravity Media should not be used for a personal or business advantage. "Advantage" includes both a positive benefit and avoiding what might otherwise result in a loss.





THANK YOU

For more information visit us
online at gravitymedia.com or
reach out to your procurement
lead.

Freelancers, please check the First Option Portal for all policies,
procedures and information including the code of conduct, privacy
standards, and health and safety protocols.

@_gravitymedia
gravitymedia.com

CAPTURE CRAFT CREATE



Tailor-made
solutions for
clients big
and small