

Medigold Health Group (being Medigold Health Consultancy Limited, company no. 03507491, and each member of its group) is dedicated to safeguarding the occupational health and wellbeing of workforces across the UK with integrity, respect, and excellence. This Supplier Code of Conduct (the "Code") outlines the standards and business practices that guide our actions, decisions and relationships with our employees, customers, suppliers and other stakeholders, ensuring that we uphold our mission, vision and values in all interactions. We expect our suppliers to align with these values and support our mission to deliver trusted services. Compliance with this Code is a condition of doing business with us.

1. Purpose and Scope

1.1 This Code sets out a framework for conduct that Medigold Health Consultancy Limited and its subsidiaries (together "Medigold Health Group", "we" or "us") expect of all suppliers, contractors, consultants, and other third parties ("Suppliers").

1.2 Suppliers must ensure that their employees, agents, and subcontractors providing services to or on behalf of Medigold Health are also compliant with this Code.

1.3 We expect Suppliers to act in the best interests of our organisation, our customers and the communities we serve. We foster relationships grounded in mutual respect, trust and shared ethical values. We hold our partners to the same high standards we uphold, expecting them to align with our commitment to human rights, fair labour practices, safe working conditions, data protection, and environmental stewardship.

2. Our Mission, Vision and Values

2.1 Mission – Keeping people in work, safe and well.

2.2 Vision – A world where employers place the health and wellbeing of their people at the heart of everything they do.

2.3 Values – Our values are enshrined in our ["Genetic Code"](#).

3. Compliance with Laws and Regulations

3.1 Suppliers must comply with all applicable laws, regulations, and industry standards in every jurisdiction in which they operate. Compliance extends to both the letter of the law and the spirit of ethical business conduct.

3.2 Suppliers must maintain policies and procedures to ensure appropriate governance and compliance is embedded in day-to-day operations.

4. Modern slavery and human trafficking

4.1 Suppliers must comply with all applicable laws, including the UK Modern Slavery Act 2015, and maintain a modern slavery policy and due diligence process.

4.2 Suppliers must:

4.2.1 ensure employment is freely chosen, with no use of forced, bonded, or involuntary labour;

4.2.2 enforce local laws on the minimum age of employment;

4.2.3 respect the right to freedom of association and collective bargaining;

4.2.4 provide safe and humane working conditions that meet or exceed legal standards;

4.2.5 ensure wages and benefits meet or exceed legal requirements;

4.2.6 ensure working hours comply with national legal limits;

4.2.7 maintain policies that protect workers against discrimination and provide equal opportunities; and

4.2.8 provide grievance processes for employees to raise concerns without fear of retaliation.

5. Economic and Financial Crime

5.2 Gifts and hospitality

5.2.1 Any gifts, hospitality, or entertainment offered to or received from Medigold Health Group personnel must be appropriate, proportionate, and transparent.

5.2.2 All gifts and hospitality must: (a) comply with applicable laws and regulations; (b) be reasonable in value and frequency; (c) be offered or received openly and transparently; (d) not create or appear to create an obligation or improper influence; and (e) be properly recorded in accordance with the supplier's internal policies.

5.2.3 Suppliers should decline or report any gifts or hospitality that could reasonably be perceived as inappropriate or that might compromise business integrity.

5.3 Tax compliance and prevention of facilitation of tax evasion

5.3.1 Suppliers must comply with all applicable tax laws and regulations, including the UK Criminal Finances Act 2017.

5.3.2 Suppliers must not engage in, encourage, or facilitate tax evasion or the evasion of national insurance or other levies, must maintain policies, training, and controls to prevent the criminal facilitation of tax evasion, and must promptly report any concerns to the relevant authorities and to Medigold Health Group.

5.4 Fraud and corporate transparency

5.4.1 Suppliers must comply with the UK Economic Crime and Corporate Transparency Act 2023 and all applicable fraud prevention requirements.

5.4.2 Suppliers must maintain accurate and up-to-date corporate records, implement controls to prevent, detect, and report fraud, and provide reasonable assistance to Medigold Health Group in responding to regulatory requests relating to economic crime or corporate transparency obligations.

5.5 Competition and antitrust

Suppliers must comply with all applicable competition and antitrust laws and must not engage in practices that unlawfully restrict competition, including price fixing, bid rigging, market sharing, or abuse of market dominance.

5.6 Trade controls, export/import and sanctions

Suppliers must comply with all applicable trade controls, export and import laws, and sanctions regimes, screen third parties against sanctions lists, and ensure goods, services and technology are not diverted to unauthorised uses.

6. Data protection, privacy and information governance

6.1 Suppliers must comply with all data protection and privacy laws, including the UK GDPR and the Data Protection Act 2018.

6.2 Suppliers must:

6.2.1 maintain a data protection policy and supporting processes;

6.2.2 provide training to employees to ensure they know how to process personal data safely and in compliance with law;

6.2.3 collect, process, and store personal data lawfully, fairly, and securely; and

6.2.4 implement robust technical and organisational measures to protect personal data against unauthorised access, loss, or misuse.

6.3 Suppliers must promptly, and in any event within 48 hours, notify Medigold Health Group of any data breach or security incident affecting our data or those of our own customers/their staff.

7. Business continuity and disaster recovery

7.1 Suppliers must maintain written BCDR plans to ensure continuity of operations and services in the event of disruptions, emergencies, or disasters.

7.2 Suppliers must:

7.2.1 develop and maintain comprehensive BCDR plans;

7.2.2 test BCDR plans regularly, at least annually, and update as necessary;

7.2.3 include procedures for data backup, recovery, and protection of confidential information;

7.2.4 maintain alternative communication channels and contact procedures; and

7.2.5 promptly notify Medigold Health Group of any significant disruptions that may impact service delivery.

8. Responsible use of technology

8.1 Where Suppliers use artificial intelligence, algorithms, or other emerging technologies in connection with Medigold Health Group, such systems must be used lawfully and ethically, be subject to human oversight, operate transparently, and be free from unlawful bias or discrimination. Suppliers must promptly disclose any material risks or incidents associated with such technologies.

9. Diversity, equality and inclusion

9.1 Suppliers must uphold diversity, equality and inclusion in the workplace, including:

9.1.1 providing equal opportunities in recruitment, promotion and treatment of employees;

9.1.2 prohibiting discrimination, harassment or victimisation on the basis of age, disability, gender, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation; and

9.1.3 fostering a culture that respects and values different perspectives and experiences.

10. Ethical Business Conduct

10.1 Suppliers must act with integrity, conducting business honestly, transparently, and fairly.

10.2 Suppliers must not:

10.2.1 offer or accept bribes, facilitation payments, kickbacks, or improper gifts;

10.2.2 engage in fraud, money laundering, or tax evasion; and

10.2.3 create conflicts of interest in dealings with Medigold Health Group.

10.3 Conflict of interest – Suppliers must identify, disclose, and manage any actual or potential conflicts of interest that may arise in their business relationship with Medigold Health Group.

10.4 Gifts and Hospitality

10.4.1 Any gifts, hospitality, or entertainment offered to or received from Medigold Health Group personnel must be appropriate, proportionate, and transparent.

10.4.2 All gifts and hospitality must:

(a) comply with applicable laws and regulations;

(b) be reasonable in value and frequency;

(c) be offered or received openly and transparently;

(d) not create or appear to create an obligation or improper influence; and

(e) be properly recorded in accordance with the supplier's internal policies.

10.4.3 Suppliers should decline or report any gifts or hospitality that could reasonably be perceived as inappropriate or that might compromise business integrity.

10.5 Conflicts of Interest

10.5.1 Suppliers must promptly notify Medigold Health Group of any circumstances that could reasonably be perceived as creating a conflict of interest, including:

(a) financial interests in competing organisations;

(b) personal relationships with Medigold Health Group personnel that could influence business decisions; and

(c) other business relationships that could compromise objectivity or independence.

10.6 Financial Crime Prevention

10.6.1 Suppliers must implement appropriate measures to prevent financial crimes, including fraud, money laundering, and terrorist financing, maintain robust internal controls, conduct appropriate due diligence on their business partners, and report any suspicious activities to relevant authorities.

10.7 Records and Whistleblowing

10.7.1 Suppliers must maintain accurate and transparent business records and make these available for review if required, and must maintain a whistleblowing policy and process that enables employees to raise concerns confidentially and without fear of retaliation.

11. Environmental Responsibility and Sustainability

11.1 We encourage all suppliers to actively pursue continuous improvement and innovation in sustainability – whether through reducing environmental impact, adopting circular economy principles, improving energy and resource efficiency, or developing new products and processes that support low-carbon, ethical, and socially responsible outcomes.

11.2 Suppliers must comply with all environmental laws and regulations.

11.3 Suppliers must maintain an environmental policy that addresses compliance and reduction of the environmental impact of their operations.

11.4 Suppliers must adopt sustainable practices including:

11.4.1 reducing energy and water consumption;

11.4.2 minimising greenhouse gas emissions;

11.4.3 managing waste responsibly, including recycling and safe disposal of waste; and

11.4.4 sourcing raw materials responsibly and ethically.

11.5 Suppliers must ensure that their supply chain and partners also meet these standards.

11.6 Climate responsibility and net zero – Medigold Health Group is committed to achieving net zero greenhouse gas emissions by 2040. Suppliers must monitor and seek to reduce their emissions and environmental footprint and, where requested, provide information on their emissions, energy use and sustainability practices. Suppliers must support reasonable initiatives and transition plans aligned to this commitment, including setting proportionate reduction targets and collaborating on decarbonisation of goods and services provided to Medigold Health Group.

11.7 Climate disclosures – Where proportionate to the size and nature of the supplier, and where data is available, suppliers should provide periodic updates on progress against climate and sustainability actions, and cooperate with reasonable requests for information needed to meet client, regulatory or voluntary reporting obligations related to climate and sustainability.

12. Goods and Services Standards

12.1 Suppliers must deliver products and services that meet agreed specifications, are safe for use, are defect-free, and comply with applicable regulations.

12.2 Suppliers must ensure traceability to source materials and provide transparency throughout the supply chain.

12.3 Suppliers must have quality assurance processes in place to monitor and maintain standards.

13. Intellectual Property and Confidentiality

13.1 Suppliers must respect and protect all intellectual property rights, including patents, trademarks, copyrights, and trade secrets belonging to Medigold Health Group and third parties.

13.2 Suppliers must not use, reproduce, or disclose any proprietary information without proper authorisation.

13.3 Suppliers must protect all confidential information belonging to Medigold Health Group and its clients, including: (a) implementing confidentiality agreements where appropriate; (b) handling, storing and transmitting information securely; and (c) restricting access to authorised personnel only and preventing unauthorised disclosure.

13.4 Suppliers must comply with all relevant data protection obligations and prevent unauthorised access, alteration, or disclosure.

13.5 Suppliers must promptly notify Medigold Health Group of any data breaches or security incidents and cooperate fully in investigations and remedial actions.

14. Supply Chain Integrity

14.1 Suppliers must uphold the principles of this Code throughout their own supply chains and conduct due diligence on their subcontractors.

14.2 Suppliers must implement appropriate supplier assessment and onboarding procedures to ensure subcontractors meet the standards set out in this Code.

14.3 Subcontracting of obligations under agreements with Medigold Health Group requires prior written approval.

14.4 Suppliers must promptly notify Medigold Health Group of any suspected or actual breaches within their supply chain.

14.5 Suppliers must have procedures in place for addressing non-compliance within their supply chain, including corrective action plans and, where necessary, termination of relationships with non-compliant subcontractors.

15. Reporting Non-Compliance

15.1 Collaborative relationships flourish through honest communication, responsiveness, and mutual respect. Suppliers are part of our mission to deliver healthy workplaces.

15.2 We encourage proactive dialogue: if issues arise, raise them early so we can work together on effective solutions.

15.3 Suppliers must establish clear reporting mechanisms for employees and subcontractors to report suspected violations of this Code, including: (a) anonymous reporting channels where legally permissible; (b) protection against retaliation for good faith reporting; and (c) prompt investigation and response procedures.

15.4 Suppliers must report any material breaches or suspected breaches of this Code to Medigold Health Group within 48 hours of becoming aware of the issue.

15.5 All reports will be treated confidentially and investigated promptly, with appropriate corrective action taken where necessary.

16. Monitoring, Audits and Corrective Actions

16.1 Medigold Health Group reserves the right to audit supplier compliance with this Code through site visits, document reviews, and employee interviews.

16.2 Audits may be conducted with reasonable advance notice, typically 10 Business Days, except in cases of suspected serious breaches where immediate access may be required.

16.3 Suppliers must cooperate fully with audits and provide all reasonable access and assistance.

16.4 Where gaps or breaches are identified, Suppliers must take timely corrective action within agreed timeframes, typically within 30 days for minor issues and immediately for serious breaches, and must provide regular progress reports until full compliance is achieved.

16.5 Persistent or material non-compliance may result in suspension or termination of the business relationship.

17. Consequences of Non-Compliance

17.1 Material breach of this Code may result in suspension or termination of our business relationship, alongside other appropriate actions, without prejudice to any other rights or remedies available to Medigold Health Group.

17.2 Medigold Health Group may remove the supplier from its approved supplier lists.

17.3 In cases of termination, suppliers must cooperate fully in transition arrangements to ensure continuity of service and protection of confidential information.

18. Continuous Improvement

18.1 Suppliers are encouraged to work with Medigold Health Group to continuously improve practices, particularly in relation to sustainability, diversity and inclusion, human rights, and innovation in occupational health.

18.2 Medigold Health Group may update this Code periodically to reflect legal, regulatory, or policy developments. Suppliers are expected to comply with the updated Code.

19. Getting in Touch

19.1 For questions, concerns, or suggestions regarding this Code or our supplier journey, please get in touch with your usual Medigold Health contact, email us at enquiries@medigold-health.com, or call 0330 390 3370.