



SUPPLIER CODE OF CONDUCT

Soho House is committed to ensuring that the conduct of our business is based on principles of integrity, honesty, and fairness. The Soho House Supplier Code of Conduct sets out our ambition to establish proactive collaboration with our suppliers in the promotion of responsible practices; that working conditions in our supply chain are safe and ethical, workers are treated with respect and dignity, and manufacturing and sale processes are ethically and environmentally responsible. We expect our suppliers to honour our social and environmental values and our commitment to integrating fair and ethical practices throughout our procurement and supply chain.

As a supplier to Soho House, the supplier's role begins, but does not end, with the understanding of this code and the communication to its employees and subcontractors. If any environmental, ethical or legal compliance issues arise, the supplier has the responsibility to notify Soho House immediately.

Soho House's suppliers (for both goods and services) are obligated, in all of their activities, to operate in full compliance with the laws, rules and regulations of the countries in which they operate, as well as against internationally recognised norms and standards. Soho House expects suppliers to strive to exceed these best practices and that suppliers implement and adhere at all times to this Code of Conduct.

PRINCIPLES

Soho House is proud to support the [United Nations Global Compact](#) and we are committed to its principles of working towards the vision of a more sustainable and inclusive global economy. The Compact resonates with Soho House's values – the guiding principles of ethical behaviour, which Soho House adopts and requires our people to adhere to. Our values and the Compact inform our Supplier Code of Conduct principles, as well as internationally recognised norms and standards, which are universally applicable. The provisions within the Supplier Code of Conduct provide the minimum standards expected of suppliers.

We require our suppliers to:

- adopt the principles in this Code of Conduct, and implement and adhere to them at all times
- demonstrate their commitments to the principles of this Code and strive to exceed both international and industry best practices
- ensure that the same principles of this Code of Conduct are implemented and adhered to by all others with whom they do business, including employees, subcontractors and other third parties
- periodically review their practices to ensure compliance with this Code of Conduct



All suppliers sent a copy of this Code of Conduct will be deemed to have accepted and agreed to it unless otherwise notified to Soho House. This Code of Conduct shall take precedence over any other Code of Conduct or terms provided by a supplier that seek to govern the same subject matters.

HUMAN RIGHTS

Soho House supports the protection of human rights around the world. Suppliers must comply with all applicable human rights and employment laws in the jurisdictions in which they work and the principles recognised in the International Bill of Human Rights and the core International Labour Organization (ILO) Conventions. When local laws are in conflict with international human rights standards, suppliers should comply with the law while seeking to honour the principles of internationally recognised human rights and the Soho House supplier Code of Conduct. Non-discrimination Suppliers must not discriminate against any worker based on age, race, colour, sex, religion, political opinion, sexuality, disability, national extraction or social origin, nor shall they participate in any acts or practices that may be defined as any distinction, exclusion or preference that impairs equality of opportunity or treatment in employment.

Community support and representation

In addition to meeting the above recognised human rights standards, suppliers must support the communities they operate in, assessing the potential impact of their activities and mitigate any negative social or environmental impact their business might have. Suppliers must also confirm that they provide employees and managers, who have direct responsibility for supply chain management, with training on the mitigation of labour abuses.

Supplier diversity

Suppliers must share the Soho House vision and values as articulated in the Soho House Pledge, for a greater diverse and inclusive representation, including at senior leadership level. Soho House supports supplier diversity through engagement with local business and social enterprises with relevant business offerings.

LABOUR

Soho House expects its suppliers to respect the rights of their employees and to comply with all relevant labour legislation, regulations and directives in the countries in which they operate (or, in the absence of any such legislation, regulations or directives, in compliance with relevant International Labour Organisation conventions). As a minimum level of assurance, we expect our suppliers to ensure that all locations used by them or their suppliers in the manufacture of products meet the provisions of the Ethical Trading Initiative (ETI) Base Code or similar standards. The ETI Base Code includes provisions in the following areas: employment is freely chosen; freedom of association and the right to collective bargaining are respected; working conditions are safe and hygienic; child labour is not used; living wages are



paid; working hours are not excessive; no discrimination is practised; regular employment is provided, and no harsh or inhumane treatment is allowed.

Freedom of association

Suppliers must ensure that workers and employers have the right to form labour unions and employer's associations and higher organisations without prior permission, in order to safeguard and develop their economic and social rights. Where the right to freedom of association is restricted under law, there must be an equivalent means of independent representation for workers.

Forced labour

Suppliers should not use any form of forced, bonded, indentured, or prison labour. All employment must be on a voluntary basis and workers should be free to terminate their employment at any time with reasonable notice. Suppliers, wherever located, must work towards ensuring that there is no slavery, forced labour or human trafficking in their business or at any stage of their supply chain, and comply with and report fully under any applicable legislation, such as the UK Modern Slavery Act.

If a supplier manufactures, or sources, products in countries that are deemed to be high risk for child labour or slave labour, they must actively participate in one of the following:

- an internationally recognised programme with third-party verification to bring better labour standards to the region. Internationally recognised programmes include ILO Better Work, Fairtrade Labelling Organizations International, SIA Social Fingerprint, and the Fair Labour Association
- a country-specific programme for sourcing companies, such as BSR's China Training Initiative or Health Enables Returns. Child labour Suppliers must not use child labour at any stage of the manufacturing and sale process.

Workers should normally be at least 15 years old, but must be at least the minimum age for employment in that country or the age for completing compulsory education in that country, whichever is the higher, as permitted by ILO Minimum Age Convention.

All suppliers are expected to comply with the UNICEF Children's Rights and Business Principles as it applies to child labour and to its wider working practices.

Harsh treatment and harassment

Suppliers must be committed to a workplace free of harassment. Suppliers should not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. Suppliers should have in place, and adequately communicate to its staff, a whistle-blowing procedure. And they must maintain adequate procedures to ensure



the protection of whistleblowers in accordance with local laws, directives, and regulations.

Remuneration

Suppliers must pay a fair remuneration for both men and women workers, for work of equal value in accordance with applicable local laws. Workers must receive wages and benefits that at a minimum meet all applicable laws. Wages and working hours Suppliers should comply with local laws relevant to living minimum wages, standard working hours and employee benefits, and where these do not exist, should pay above the minimum living wage and benefits as defined by the International Labour Organisation or similar initiatives.

Suppliers should not delay, withhold or defer wages legally due to its employees. Overtime hours will be voluntary and fully compensated at regular or premium rates, according to local legal requirements. In special circumstances, employees may be expected to work longer than standard hours for limited periods of time. Where this occurs, additional working hours and consecutive working days will be in compliance with the local regulations, and planned in a way to ensure safe and humane working conditions.

Health and safety

Suppliers must ensure that they and their subcontractors abide by all local laws, directives and regulations to provide a safe and healthy working environment, which will facilitate optimal physical and mental health in relation to work and the workplace, or in any other location where production or work is undertaken. This involves suppliers having management systems in place that meet the requirements set out in the ILO Occupational Safety and Health guidelines. Requisite and appropriate training must be given to workers in the workplace in safety practices and procedures, including fire protection.

ENVIRONMENT

Soho House is committed to protecting the environment, and requires its suppliers to have an effective environmental policy and to adhere to all environmental legislation, regulations and all local laws to facilitate the protection of the environment, and to have processes committed to reducing the environmental impact of their designs, operations, manufacturing processes, and waste emissions. Suppliers should, wherever possible, support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility, and encourage the use of environmentally friendly technologies. Soho House seeks to work with suppliers who put plans in place to improve their environmental impact.



Minimising GHGs (Greenhouse Gas Emissions), including the use of renewable energy

Suppliers should continuously work to understand, improve and report on their water and energy efficiency in order to minimise their energy consumption and greenhouse gas emissions.

Single-use plastic

We collaborate with suppliers to reduce our wider plastic consumption globally and source suitable sustainable alternatives. Suppliers should avoid the use of single-use plastics in packaging and products, including avoidance and removal of all microbeads (polyethylene, polypropylene, polyethylene, terephthalate or polymethyl methacrylate).

Sustainability-related and certified materials, products and textiles

Suppliers should aim to ensure that all products and textiles they use meet appropriate sustainability standards. Animal testing and animal-based products Soho House does not condone the use of animal testing on any products. If a supplier asserts that there is an exceptional situation in which consumers would benefit from animal testing, the supplier must receive explicit approval from Soho House before supplying the relevant products. Suppliers should not use and must not supply to Soho House products that make use of any fur, skins, food or food ingredients of plant or animal origin (including fish) of any species specified in The International Union for Conservation of Nature (IUCN) Red List of Threatened Species.

Food and beverage products

All food and beverage products should be sourced from sustainable producers who do not employ overly intensive farming or fishing practices. For food products with particular sustainability challenges, such as fish, avocados, tea, coffee, palm oil, cocoa and sugar, suppliers should be able to evidence the provenance of these goods and, where relevant, conform to globally recognised standards such as Marine Stewardship Council (MSC), Fairtrade, Rainforest Alliance, and Ethical Tea Partnership. In respect of all products made of wood or containing wood components, suppliers must hold a sustainability certification. Ideally this would be Forest Stewardship Council (FSC) or other certification standards accepted by the Carbon Disclosure Project (CDP). For all products made of wood or containing wood components, a full chain of custody must be available (from country of origin to production) and produced to Soho House if requested.

Waste in electrical and electronic equipment

Any supplier supplying electrical or electronic equipment must meet the standards of the European Waste Electrical and Electronic Equipment Regulations (WEEE) 2006 (as amended) and the Restriction of Hazardous Substances Directive (RoHS). All suppliers



should ensure that the products they use and supply do not have planned obsolescence, and are recyclable and recycled to the maximum extent possible.

Toxins and heavy metals

Suppliers must, as far as is possible, minimise the concentration of heavy metals and brominated fire retardants in products and packaging being supplied, and must comply with UK standards on maximum levels of heavy metals and brominated fire retardants and heavy metals, including cadmium, hexavalent chromium, lead and mercury. Suppliers supplying cleaning and toiletry products must comply with legislation and regulations for any products containing ingredients known to be hazardous.

Minimising waste and maximising reuse and recycling

Soho House's suppliers must have in place plans for all products' end of life. This is in order to reduce waste and pollution, keep products and materials in use, and serve a regenerating natural system, through programmes such as upcycling, recycling, composting and/ or safe disposal of any non-usable parts, or circular economy principles.

ANTI-CORRUPTION

Suppliers are required to perform all business dealings with integrity and transparency. Suppliers are required to comply with all relevant laws, rules and regulations applicable to them, including all applicable anti-bribery, anti-lobbying and anti-corruption laws, regulations and codes.

Record accuracy and retention

Suppliers shall ensure that business records relating to Soho House are securely retained for the period required by law, and that they accurately and fairly reflect all business transactions.

Data protection

Soho House suppliers shall ensure compliance with laws and directives providing for the protection, transfer, access and storage of personal information. This includes, but is not limited to, compliance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018, the California Consumer Privacy Act, and equivalent applicable legislation in other countries.

Anti-bribery

This includes, but is not limited to, compliance with the UK Bribery Act 2010, the Foreign Corrupt Practices Act, and equivalent applicable legislation in other countries. Suppliers should at all times act in accordance with Soho House anti-bribery and anti-corruption policies and procedures as may be communicated to them or published



from time to time, and should notify Soho House immediately in writing if any violation, or suspicion of a violation, of such policies and procedures arises.

Suppliers are responsible for ensuring that any persons who perform services for and on their behalf are also compliant with these provisions.

Anti-money laundering

Suppliers must not be involved in any form of money laundering. They must agree to provide Soho House with any information it reasonably requires to satisfy itself that it knows the beneficial ownership of the supplier and that the supplier is not involved in criminal activity.

Gifts and entertainment

Suppliers should not offer Soho House employees, or any related person or company, excessive gifts or entertainment which contravenes our Supplier Code of Conduct, or offer any gifts or entertainment that may have an adverse impact on the reputation of Soho House.

REVIEW AND AUDIT

Soho House will work with suppliers to ensure and evaluate performance against the Supplier Code of Conduct. The Supplier Code of Conduct specifically requires that its suppliers ensure that the same principles of this Code of Conduct are implemented and adhered to by all others with whom they do business, including employees, subcontractors and other third parties. Suppliers hereby acknowledge and assure Soho House's right to review, request documentation and evidence, to conduct audits and/ or physical inspections (including unannounced inspections) of its suppliers' facilities and records, including those of any subcontractor or other third party involved in the purchase of products from Soho House and their sale to end customers, on an on-going basis to verify compliance with the requirements of this Code of Conduct. Full and open access must be given to Soho House and/ or its auditors in respect of facilities that actively engage in the manufacturing and procurement of its products. Suppliers are required to periodically review their practices to ensure compliance with this Code of Conduct. We withhold the right to periodically monitor and review the social and environmental impact and performance of our suppliers. As a business, we tackle strategic procurement areas in unison, and you may therefore be required to provide Soho House with social and environmental performance information via a supplier audit process.

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Soho House will review and revise this Code of Conduct from time to time.
Amended April 2022.

This document is currently supported by the:

- [Gender Pay Gap Report](#)
- [Modern Slavery Statement](#)
- [Responsible Sourcing Policy](#)
- [UK Tax Principles](#)
- [Diversity and Inclusion Pledge](#)
- [Responsible Environmental Management Policy](#)
- [Supplier Diversity Programme](#)