



HS WALSH & SONS

— SERVING JEWELLERS & HOROLOGISTS SINCE 1947 —

Hunter House
Biggin Hill Airport
Churchill Way
Biggin Hill
Kent
TN16 3BN

Supplier Code of Contact 2026

As a leading supplier of tools, equipment, and materials to the jewellery and horological trades, H S Walsh & Sons Limited is committed meeting the highest standards of integrity, ethics, and sustainability. To safeguard our reputation and shared values, we require all our supply chain partners to adhere to the following Supplier Code of Conduct.

Ethical Business Practices & Financial Integrity

- **Anti-Bribery and Corruption:** To comply with the UK Bribery Act 2010, suppliers are not to engage in any form of bribery, money laundering or corrupt activities and should take appropriate steps to ensure compliance with the relevant laws in its own country and that of our base, the UK.
- **Fair Competition:** Suppliers must adhere to all applicable antitrust and fair competition laws, ensuring honest and legal marketplace interactions at all times.
- **Conflicts of Interest:** Suppliers must immediately disclose any potential or actual conflicts of interest involving HS Walsh & Sons personnel or operations.
- **Information Security:** Intellectual property, proprietary designs, and sensitive customer or employee data must be protected securely and processed lawfully.

Human Rights & Responsible Labour Practice

- **Modern Slavery & Human Trafficking:** Suppliers must maintain a policy of zero tolerance toward any form of forced, bonded, indentured, or involuntary prison labour, fully complying with the Modern Slavery Act 2015.
- **Child Labour Avoidance:** Suppliers must strictly ensure no child labour is used in any stage of manufacturing or distribution, adhering to the legal minimum working age standards.
- **Forced Labour:** Any form of forced or compulsory work under the threat of a penalty or coercion, and for which the person has not offered themselves voluntarily is not tolerated in our supply chain.
- **Equality and Non-Discrimination:** Suppliers must comply with the Equality Act 2010, fostering a workplace free from discrimination, harassment, or victimisation based on age, gender, race, religion, disability, sexual orientation, or other protected traits.
- **Wages and Working Hours:** Workers must be provided with fair pay, benefits, and reasonable working hours that fully align with or exceed local UK statutory regulations and industry standards, such as National Minimum Wage and the Working Time Directive.
- **Freedom of Association:** Our Suppliers are to respect workers' legal rights to join or form trade unions, engage in collective bargaining, and communicate openly with management without fear of discrimination, retaliation, or harassment.

Animal Welfare

- **Legally Sourced:** Suppliers must ensure that any materials or components derived from animals are sourced legally, responsibly, and in full compliance with all local and international animal welfare laws.
- **Humane Treatment:** Animals must be treated humanely, following the globally recognized "Five Freedoms" (freedom from hunger/thirst, discomfort, pain/injury/disease, fear/distress, and freedom to express normal behaviour).

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+44 (0) 1959 543 660

Director: W P Sheehan

Registered in London 03553069



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- **Full Traceability:** Suppliers must completely prohibit the use of materials obtained through illegal poaching, endangered species trafficking, or any practices causing unnecessary suffering. Full traceability and valid documentation regarding the origin of animal products must be provided upon request.

Health & Safety

- **Safe Working Environments:** Suppliers must provide a secure, hygienic, and healthy workplace, implementing robust measures to prevent occupational injuries and illnesses.
- **Protective Equipment and Training:** All employees must be equipped with the necessary Personal Protective Equipment (PPE) and comprehensive safety training relative to their specific roles and responsibilities.
- **Risk Management:** Suppliers must conduct ongoing risk assessments for all relevant aspects of their business and which impact any elements of the supply chain process.

Environmental Responsibility

- **Chemical & Material Compliance:** Suppliers must safely manage and fully comply with the UK REACH Regulation and relevant environmental laws governing chemical safety, restriction, and tracking. HS Walsh & Sons in return will comply with COSHH for our own operations.
- **Responsible Sourcing:** Precious metals and raw manufacturing components must be sourced ethically, ensuring transparent traceability and conflict-free production pathways.
- **Waste and Resource Management:** Suppliers must actively work to minimise environmental impact through sustainable waste reduction, recycling initiatives, and responsible disposal procedures. Where appropriate, HS Walsh & Sons will work with suppliers to achieve mutually beneficial impacts for our businesses and the overall environment. Adherence to the revised **Packaging and Packaging Waste Regulation (PPWR)** (Regulation (EU) 2025/40) throughout our supply chain is required.

Auditing, Monitoring, & Transparency

- **Compliance Assessments:** Suppliers are required to provide relevant supplier audit information and evidence upon request by HS Walsh & Sons. We will only ever request information required in the line of our own business, meeting our own supply chain conformity requirements and duty of care.
- **Site Visits:** HS Walsh & Sons welcomes the opportunity to visit its suppliers and extends that invites to suppliers visiting any of our three premises.
- **Subcontractor & Own Tier Management:** Suppliers must hold their own subcontractors and tier-partners accountable to the core principles and regulatory thresholds of this Code.

Non-Compliance & Remediation

- **Corrective Actions:** If an instance of non-compliance is identified, the supplier must implement a mutually agreed corrective action plan to rectify the issue within a defined timeframe.
- **Termination of Relationship:** Severe, persistent, or un-remedied violations of this Code constitute a material breach of contract and may result in immediate commercial termination.

Signed (Name & Title): WP Sheehan (CEO).....

Date: August 2026.....

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