

THE GUINNESS WORLD RECORDS BUSINESS PARTNER CODE OF CONDUCT

1. Introduction

1.1 Policy Statement

Guinness World Records (“GWR”) is committed, across its global businesses, to ensure a high standard of ethical behaviour towards its employees, business partners, and the environment.

GWR conducts its business in accordance with the provisions of this Business Partner Code of Conduct (“the Code”) and expects its business partners to operate in compliance with the Code’s standards, and with all applicable national and international laws and regulations.

We believe the principles described in the Code promote a long-term view of doing good business, helps create a high degree of trust, and builds solid and sustainable relationships. As a result, we put high expectations on ourselves to perform our business in an honest, open and ethical manner.

1.2 Scope of the Code

GWR’s commitment to the Code applies to all areas of its global business, and to each business partner (a “Business Partner”).

For the purposes of the Code, a Business Partner includes all third parties who act for, on behalf of, or in collaboration with, any GWR company. These include – but are not limited to – suppliers, printers, licensees, agents, sub-contractors, sales representatives, consultants, and freelancers of any description.

By entering into an agreement with GWR, Business Partners agree to, and accept the terms, of the Code.

1.3 Compliance with the Code

GWR requires all its Business Partners to comply with the provisions of this Code, and each Business Partner is expected to obtain similar compliance with the Code’s provisions from their own business partners.

GWR recognises that, in some cases, its Business Partners may not be immediately able to achieve the high standards detailed in the Code. Where that is the case, GWR is willing to consider engaging with Business Partners who have:

- Implemented robust processes which aim to raise standards in line with the Code within an agreed timeframe; or
- Demonstrated a responsible and transparent approach to their general working practices; or
- Successfully undergone an audit or verification procedure in accordance with GWR’s internal auditing procedures.

If GWR considers that a Business Partner has not demonstrated compliance with the Code, the Business Partner must take all such appropriate remedial actions as requested by GWR to address any areas of concern.

Failure to remedy any area of concern may result in GWR taking further appropriate action, including contract termination.

2. People

2.1 Diversity, Inclusion & Belonging

GWR is committed to encouraging diversity, inclusion and belonging, and eliminating unlawful discrimination.

Diversity, inclusion and belonging is fundamental to the success of GWR, and we strive for a transparent environment where our globally dispersed voices are heard and welcomed. The aim is for all GWR's employees to feel respected and included, enabling everyone to give their best, and to ensure our workforce truly reflects the diversity of our audiences.

GWR believes that many different ideas and perspectives coming together create a positive culture and environment for everyone where creativity and innovation is celebrated.

GWR expects its Business Partners to conduct their business in a manner which encourages and promotes a similar commitment to diversity, inclusion and belonging.

2.2 Dignity at Work

GWR's employees have a responsibility to always treat others with dignity, respect and courtesy. All employees are expected to exhibit conduct that reflects these behaviours, as well as attend training to enhance knowledge and awareness.

GWR's Dignity at Work policy plays a crucial role in preventing employees from experiencing bullying and harassment at work and ensures everyone is clear about what is acceptable conduct in the workplace. The Dignity at Work policy provides that all GWR's people are entitled to:

- Be treated with dignity, respect and courtesy; and
- Be valued for their skills, experience and abilities; and
- Work in an environment free from bullying, harassment, victimisation or discrimination.

GWR does not tolerate discrimination because of age, colour, disability, ethnicity, family or marital status, gender, gender identity or expression, nationality, physical and mental ability, race, religion, sex, sexual orientation, socio-economic status and any other characteristic that makes all of us unique.

Our Business Partners must conduct their business in a respectful and dignified manner, in an environment which treats its employees with dignity, free from harassment, bullying, discrimination, physical and verbal abuse, threats or intimidation of any description.

2.3 Health and Safety

GWR provides and maintains a healthy and safe working environment for all its employees and for others who visit its places of work. GWR does all that is reasonable and practicable to prevent personal injury and to comply with the duties laid upon the company as an employer under relevant legislation.

Similarly, our Business Partners shall provide a healthy and safe working environment for their employees by observing the laws and rules on health and safety in the workplace.

3. Business Integrity

3.1 Compliance with the Law

As a truly international company, GWR is committed to comply with all applicable laws and regulations. To ensure a transparent and trusting business relationship, we also expect the same commitment from our Business Partners.

All Business Partners shall be familiar with applicable laws, regulations and guidelines that are relevant at the local, national and international level to their respective activities for, in collaboration with, or on behalf of, GWR.

National and international laws regulate the import, export and domestic trade of goods and services, and capital movements and payments. Our Business Partners must have adequate procedures in place to ensure that transactions with third parties do not contravene economic embargoes or regulations of trade, import and export control or regulations for the combating of terrorism financing.

In specific countries or markets, stricter rules than those described in the Code may be in force. In such an event, the stricter rules are to be applied.

3.2 Anti-Corruption, Bribery and Fraud

It is our policy to conduct all GWR business in an honest and ethical manner. We take a zero-tolerance approach to bribery, corruption and fraud, and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

Corruption is contradictory to the objective of doing good business. By 'corruption' we mean a form of dishonest or unethical conduct by a person entrusted with a position of authority, often to acquire personal benefit. Corruption can be in any form, including but not limited to bribery and fraud. Corruption damages the confidence and trust that our stakeholders have in GWR and in the GWR brand. Furthermore, corruption undermines the rule of law, distorts markets, and deprives other people's rights and resources. GWR condemns corruption in any form, including embezzlement, theft, misappropriation, tax evasion or money laundering.

Consequently, we require all Business Partners to comply with the following principles:

- No one acting on behalf of GWR, or with whom GWR has a relationship, may directly or indirectly request, offer, pay, accept or receive bribes or conduct other corrupt practices.
- No form of facilitation payment is allowed.
- GWR's representatives do not ask for gifts or hospitality and are not permitted to accept and/or provide gifts or hospitality from, or to, any Business Partner or third party.

Business Partners shall condemn any form of corruption, bribery or fraud.

Trust and honesty are cornerstones of the GWR culture; therefore, we reserve the right to enquire or investigate any Business Partner if any form of corruption is suspected.

3.3 Prohibition of Forced and Child Labour

Business Partners must not use any form of forced, bonded or involuntary labour.

This prohibition applies to all work or service which is demanded from any person under the threat of any penalty and for which the individual has not offered themselves voluntarily, modern forms of slavery and trafficking for labour.

Business Partners are also prohibited from using any form of child labour.

Child labour is defined in accordance with the International Labour Organization (ILO) Conventions 138 and 182, and national laws. All workers must have reached the age of 15 or have reached the minimum legal working age under national law, whichever age is the higher.

3.4 Data Privacy and Protection

Business Partners have a legal responsibility to safeguard the privacy of their clients, employees and other parties, and must comply with all applicable laws and rules when personal data are collected, processed, transferred or stored. In particular, the personal data used by Business Partners must be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for which the personal data are processed, and.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing against accidental loss, destruction or damage, using appropriate technical or organisation measures.

3.5 Information Security

Business Partners must only use information provided to them by GWR to fulfil their contractual obligations and shall protect it from internal and external misuse by implementing appropriate security measures. Failure to implement such measures can have significantly damaging consequences, such as cyber-attack, data loss, intellectual property infringement or identify theft.

Business Partners shall not use any information provided by GWR for any personal purpose, or a purpose which may be improper, unethical or illegal.

Prior to GWR granting access to its systems or data, Business Partners are required to respond satisfactorily to an information security questionnaire.

GWR reserves the right to deny prospective Business Partners access to its systems where GWR is not satisfied that appropriate security measures have been implemented.

3.6 Financial Integrity

Business Partners must conduct their business, store documents and perform financial reporting with integrity.

Business transactions, assets and liabilities will be kept accurate and correct, and documented in accordance with legal requirements.

All payments and transactions must follow all applicable laws and established accounting policies. Business Partners shall have appropriate procedures in place to detect and report money laundering.

GWR reserves the right to undertake credit checks and/ or request references from third parties to ensure its Business Partners meet its financial integrity requirements.

3.7 Fair Competition

Business Partners must comply with all applicable anti-trust and competition laws.

As ethical organisations, our Business Partners are committed to behaving openly and fairly when competing for customers' business. They will not make false claims that unfairly denigrate competitors, or improperly interfere with a competitor's business relationships.

Business Partners will not engage in or tolerate any anti-competitive behaviour, including entering into restrictive agreements with competitors, suppliers, distributors, retailers or customers.

This includes, but is not limited to, price-fixing agreements with competitors; any form of market division or allocation agreement; bid-rigging; or the unlawful sharing of competitively sensitive information with competitors.

3.8 Protection of Intellectual Property

As a company whose reputation is built on the creation and protection of intellectual property ("IP"), GWR understands the crucial importance of the investment in, and value of, IP.

Intellectual property covers any works of intellectual creation, including but not limited to, literary works, photographs, television programmes and clips, sound recordings, designs, databases, trademarks, and patents.

GWR is also crucially aware of the damage that can be caused when IP is used improperly or infringed. Intellectual property infringements include, but are not limited to, the publication, distribution or display of copyright or trademark material without permission or licence, and the creation and distribution of unauthorised copies of intellectual property, both in physical or digital form.

We therefore expect Business Partners to respect and protect all types of intellectual property, whether it belongs to GWR or anyone else.

For GWR, respecting IP means, in particular:

- Treating other parties' IP as you would your own.
- Obtaining written authorisation in advance of use, and
- Respecting the limited applicability of the concepts of fair use and fair dealing.

3.9 Conflicts of Interest

For the purposes of the Code, a potential conflict of interest occurs when the outside interests of an employee of a Business Partner [for example, their financial or personal interests] interfere with GWR's interests or the employee's work-related duties. For example, a conflict of interest may occur when a Business Partner's employee is able to influence a decision that may result in a personal gain for the employee or the employee's family member because of business dealings with GWR.

Business Partners who are affected by a potential or actual conflict of interest in their activities in relation to GWR are obliged to disclose and resolve these as quickly as possible.

3.10 Confidentiality and Business Information

GWR is committed to preserving the confidentiality and integrity of all its business information assets to preserve its competitiveness, cash-flow, profitability, legal, regulatory and contractual compliance, as well as its commercial reputation.

GWR confidential information is information that is sensitive, or confidential, within the organisation and intended for business use only by those with a need-to-know. Unauthorised disclosure of such information could cause significant harm, including legal or financial liability and damage to GWR's, as well as its Business Partners', reputation.

Business Partners must ensure that confidential information and data are stored securely, that information is only made available to authorised individuals, and is only used for agreed business purposes.

Unauthorised disclosure of confidential information about GWR or its Business Partners to third parties, such as the media or competitors, shall constitute a breach of the Code.

4. Environmental Standards

GWR is committed to ensuring the ethical and responsible sourcing of its product-related materials. For example, 100% of the two million GWR books produced in 2020 were accredited by the Programme for the Endorsement of Forest Certification ("PEFC"). GWR's books are also 98% recyclable, containing PEFC accredited paper sourced in Finland, and other paper products (boards, endpapers, and covers) printed with vegetable-based inks, and packed in Forest Stewardship Council accredited cartons.

GWR has also made a long-term commitment to improve the wider sustainability of its entire supply chain, from paper mills to printer to distributors, and the transport that links each part of the chain.

Business Partners must share GWR's awareness of environmental matters and commitment to improve environmental standards, and at the very least must comply with applicable local environmental laws and regulations and any additional environmental standards as GWR may notify in writing.

Business Partners agree that the responsible use of natural resources, waste reduction, increased recycling and use of environmentally friendly products from sustainable sources, are important parts of a shared responsibility towards the environment.

5. Implementation

5.1 Observation of the Code

As part of its contractual relationship with GWR, Business Partners shall guarantee that the Code is observed and implemented.

Business Partners must also ensure that those employees who perform activities for GWR also comply with the provisions of the Code.

5.2 Supply Chain Compliance

Business Partners must adopt effective systems for the implementation of the provisions of the Code by its own business partners who they appoint within the scope of their activities for GWR, and for monitoring and documenting compliance with its provisions to the satisfaction of GWR.

5.3 Violations of the Code

The Code is an integral part of all contractual agreements with GWR.

If GWR considers that a Business Partner is not in compliance with the Code, the Business Partner must take all such appropriate remedial actions as requested by GWR to address any areas of concern, including supporting any investigation conducted by GWR or its appointed representative(s).

Failure to remedy any area of concern within a reasonable timeframe may result in GWR taking further appropriate action, including contract termination.

GWR reserves the right to terminate if, in its reasonable opinion, Business Partners have failed to demonstrate to the satisfaction of GWR:

- A genuine willingness to work towards meeting all the provisions of the Code within a reasonable timeframe, or
- A sufficient openness and transparency to allow a robust verification of their working practices.

6. Reporting Violations

Should Business Partners have any queries regarding any part of the Code, please get in touch with your existing GWR business contact.

Any suspected violation of the Code should be reported to GWR's Governance Team, which includes the heads of Finance, Legal, Operations, and People & Culture.

The GWR Governance Team: <https://www.guinnessworldrecords.com/contact/code-of-conduct-enquiry>

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