

halfords

# GLOBAL SOURCING CODE



Approved by the Halfords Group plc Board on 10 September 2026  
Next review due before 10 September 2027



# OUR GLOBAL SOURCING CODE

**Halfords Group Plc (“Halfords”) is the UK’s leading provider of motoring and cycling products and services. We are a household-name retailer with over 130 years of heritage and market-leading awareness of our brand.**

Our mission is to realise a sustainable future by championing all forms of electric transport and supporting colleagues and consumers in making smarter transport choices. Whilst the principles set out in this Global Sourcing Code (“Code”) are instrumental in enabling our commercial and responsible sourcing goals, they also work to raise global supply chain standards and positively enhance the lives of the many people working in our global supply chain.

This Code supports our commitment to respect human rights and uphold international standards, including the United Nations (UN) Guiding Principles on Business and Human Rights and the Organisation for Economic Cooperation and Development (“OECD”) Guidelines for Multinational Enterprises. This Code details the **minimum standards** we expect our suppliers to adhere to and in turn ensure that their own business partners meet similar standards.

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# Monitoring Compliance

1

**We work with EcoVadis to enable our responsible sourcing programme and monitor compliance with our Code.**

As such we require suppliers to complete self-assessments through the EcoVadis platform, which help to assess a supplier's performance in various areas including: ethics; environmental management; labour practices; and human rights. We will take all reasonable and practical steps, including factory/site inspections and independent audits, as required, to ensure the principles detailed in our Code are being met by our suppliers and in turn by their own business partners.

We will only trade with those who comply fully with our Code and in the event of any failure to do so, we reserve the right to end the business relationship and cancel outstanding orders. We recognise that in the event of non-compliance, withdrawal of our business may cause severe hardship to those employed. Therefore, our preference is to work with our suppliers in partnership to achieve compliance and carefully review progress made before considering severing the relationship.



## Operating with Integrity

# 2

**We expect our suppliers to comply with all relevant laws, codes, and regulations in the countries where they operate and to conduct business with integrity.**

We expect suppliers to notify Halfords promptly should any legal, administrative sanction or fine be brought against them in relation to any of the requirements set out in this Code.

**As such, we expect suppliers to:**

- Conduct their business ethically without **bribery**, **corruption**, or any type of fraudulent business practice;
- Avoid **conflicts of interest** in their business dealings and operate with full transparency with respect to any circumstances where a conflict may arise;
- Safeguard **confidential and personal information** and meet the requirements of applicable data privacy laws and regulations;
- Not offer or accept **gifts and entertainment** where to do so would constitute, or would be perceived as constituting, corrupt activity; and
- Not engage in deliberate illegal **tax evasion** or facilitate such evasion, ensuring open transparency with tax authorities.



## Respect for Human Rights

3

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**We respect the human rights of our employees  
and the workers within our supply chain.**

Our commitment to respect human rights is based on the International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights; and the International Labour Organization's ("ILO") Declaration on Fundamental Principles and Rights at Work.

## As a minimum, we expect suppliers to ensure:

### Operations are free from child labour:

- All workers must be above 15 years of age or the legal minimum age for work in the local jurisdiction, whichever is higher.
- The minimum age for work should not be below the legal age for finishing compulsory schooling.
- Young persons under the age of 18 years will not be employed in conditions which may be considered hazardous or likely to harm the health, safety or morals of children.

### Workers are treated fairly and with respect:

- Contractual terms and conditions of employment will ensure that workers are not unfairly treated, including those from vulnerable groups.
- Workers are not subject to any forms of harassment or intimidation.
- There will be no exploitation or discrimination of workers based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Workers are free to choose whether or not to associate with any recognised trade union group and bargain collectively.

### Workers do not work excessive hours:

- Working hours should be in accordance with national laws and ILO standards on working hours.
- In the absence of applicable laws or collective agreements, normal working hours should not on a regular basis exceed a maximum of 48 hours per working week, or 60 hours per working week including overtime.
- Employees shall be allowed at least one day of rest in every seven-day period.

### All work is voluntary:

- Forced or involuntary labour will not be accepted. Labour should be free from modern slavery, which includes slavery, servitude and forced, compulsory, bonded, involuntary, trafficked or unlawful migrant labour.
- Overtime will be voluntary.
- Workers should not be required to pay recruitment fees at any stage of the recruitment process.

### Fair wages and benefits:

- Wages and benefits will, as a minimum, be in accordance with legal minimum wage criteria or appropriate industry standards.

### A safe working environment:

- Work conditions must comply with all applicable local and national health and safety laws and regulations.
- Procedures must be established to identify and address workplace health and safety risks and implement safe working practices.
- Where relevant, appropriate personal protective equipment must be provided to prevent occupational injuries or illnesses.
- Workers should receive regular and recorded health and safety training.
- Workers must have access to clean toilet facilities and to potable water.
- Where accommodation is provided, this must be safe, hygienic and meet the basic needs of the workers.

### Responsible sourcing of materials:

- Procedures must be established to ensure that raw materials, minerals and derivatives of minerals (including cobalt, gold, tantalum, tin and tungsten, and the ores from which they originate) are sourced in compliance with all applicable laws and regulations and in a manner that respects human rights and preserves the natural environment.
- Where products or materials supplied to Halfords contain such minerals, suppliers must work to exercise appropriate due diligence and perform a reasonable country of origin inquiry, including requiring its suppliers to engage in similar due diligence.



# Minimise Environmental Impact

4

**We are committed to reducing our environmental impact and as such have committed to having net zero carbon impact across our value chain by 2050 at the latest.**

In order to achieve this, we require our suppliers to provide reasonable assistance, where requested, with information to support the reduction of environmental impacts of our products and services. This may include, but is not limited to, information relating to bill of materials, energy consumption, carbon emissions and waste data.

**We expect suppliers to:**

- Comply with all local and national environmental laws and regulation;
- Identify and actively seek to minimise their impact on the environment, including in the areas of water, waste, energy and carbon;
- Actively track and reduce energy use and greenhouse gas emissions in line with climate science and the Paris Agreement (2015), setting appropriate reduction targets;
- Integrate environmental consideration into product design and/or provision of services; and
- Reduce the level of packaging used and consider ease of recyclability. Where possible, minimise reliance on raw materials and consider recycled or renewable materials for both products and packaging.



## Raising Concerns

# 5

**We encourage a culture of ‘speaking up’ and expect our suppliers and their workers to do so in confidence and without fear of retaliation.**

**As such we expect our suppliers to:**

- Have effective procedures in place to enable their employees and contractors to ask questions, raise concerns and/or report suspected or actual breaches of the requirements of this Code and/or any illegal activity that may impact Halfords.
- Promptly investigate any credible concerns about suspected or actual breaches of the requirements of this Code and take appropriate action to minimise any actual impact.
- Report to Halfords any suspected or actual breaches of the requirements of this Code and/or any illegal activity that may impact Halfords, as soon as they become aware of them via the external and confidential SeeHearSpeakUp reporting channels:

### Telephone:

|             |                 |
|-------------|-----------------|
| UK          | 0800 056 2539   |
| Ireland     | 1 800 901 631   |
| Hong Kong   | 800 900 508     |
| China North | 1 0800 712 2685 |
| China South | 1 0800 120 2685 |
| Taiwan      | 0080 113 6354   |

The confidential reporting hotline is operated 365 days a year, 24 hours a day. All call handlers are professionally trained and qualified to ensure professionalism and confidentiality.

### Website:

[www.seehearspeakup.co.uk/submit-a-concern](http://www.seehearspeakup.co.uk/submit-a-concern)

**Email:** [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)  
Stating ‘Halfords’ in the subject header.

Concerns raised will be passed to senior officers within **Halfords Limited** to consider potential investigation. Personal details, such as name and contact information will not be shared unless consent is provided to **SeeHearSpeakUp**.



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