

# Supplier Code of Conduct





# Contents

1	Introduction
2	How we will work with suppliers to assess compliance
2	Our commitments
3	Climate change and sustainability
4	Health, safety and wellbeing
5	Business ethics and integrity
6	Human rights
7	Diversity and inclusion
8	Information security, data privacy and intellectual property



## Introduction

Our suppliers are integral to our ability to fulfil the commitments we've made. That's why we focus on building strong, lasting relationships, and making sure that the values and standards we care about are shared across our supply chain.

By working together, we aim to encourage positive, fair practices that help both the environment and the societies in which we operate.

Sara Bailey, Senior Partner

## How we will work with suppliers to assess compliance

Our suppliers vary in size, operate across different sectors, and provide a wide range of products and services, so we recognise that a one-size-fits all approach doesn't work.

We have developed this Supplier Code of Conduct ("the Code") as a starting point for open conversations across our supply chain. It sets out the commitments we have made and helps our suppliers understand our approach, so we can work together to uphold high standards of conduct.

We will support our suppliers in implementing the Code through ongoing conversations, recognising that approaches may evolve over time.

To help ensure alignment with our expectations, we may carry out self-assessment questionnaires, audits, or other reviews. Whilst we will always aim to work collaboratively to address any issues, non-compliance may mean we need to review the future of our business relationship.

We also encourage suppliers to provide a safe and confidential way for workers to raise any concerns, and to keep us informed of any issues or potential risks related to the goods or services they provide.

The Code will be reviewed periodically to ensure it reflects best practice and continues to support meaningful progress.

## Our commitments

This section outlines:

- **Our commitments:** The commitments and targets we have set ourselves and will report progress against.
- **Supply chain standards:** The standards we aim to align across our supply chain, reflecting our core values and objectives. Together, we seek realistic, achievable goals that support continuous progress. We expect direct suppliers to uphold and promote this Code throughout their own supply chains, ensuring subcontractors and partners do the same where applicable.
- **The key performance indicators (KPIs)** that we may ask you to report on. We will use these to track progress, drive continuous improvement and ensure accountability.

All our suppliers must comply with all domestic and international laws and regulations that are applicable to the goods and/or services that they provide.





# Climate change and sustainability

## Mission

By working together to uphold the commitments and standards outlined below we can support the transition to a net zero economy, driving meaningful reductions in emissions and enhance the resilience of our supply chain to climate risks.

Through shared efforts, we can reduce waste and promote circular economy solutions, creating a lasting positive impact. By aligning our actions with sustainable innovations and investing in environmentally friendly technologies, we can significantly reduce our collective carbon footprint.

## Our commitments

- **Net zero by 2050:** We are committed to reducing our carbon footprint in line with climate science.
- **Sustainable procurement:** We integrate environmental impact and sustainability criteria into supplier selection and decision-making.
- **Circular economy and waste reduction:** We prioritise resource efficiency, waste reduction and the reuse of materials where possible.
- **Transparency and reporting:** We track and disclose emissions, resource use and sustainability performance.
- **Reducing indirect emissions:** We work to lower our scope 3 emissions from suppliers, business travel and purchased goods and services.
- **Encouraging innovation:** We seek to support suppliers that develop and adapt environmentally responsible solutions.

## Supply chain standards

- **Explore commitment and adoption of a net zero target aligned** with climate science or verified by the Science-Based Targets initiatives (SBTi).
- **Work to reduce your direct and indirect carbon emissions** where possible or outline a clear plan of how you intend to do this in the future.
- **Procure renewable energy** where possible or explain why you are unable to do this.
- **Explore collaborative opportunities** to reduce carbon output and enhance resilience to climate related risks.
- **Implement circular economy principles** including reducing waste, increasing reuse of materials and improving resource efficiency.
- **Assess and mitigate climate risks** in your operations and supply chain to help us to understand your environmental impact.
- **Provide suggestions of innovative approaches to service delivery** to reduce carbon emissions.

## Key performance indicators (KPIs) we may ask you to report on

- Total greenhouse gas (GHG) emissions (scope 1, 2 and 3).
- Use of renewable energy and sustainability certifications (e.g., X% renewable energy, REGO certification, B Corp, ISO 14001 or SBTi commitment).
- Emissions or environmental intensity metrics (e.g., tonnes CO2 per unit, revenue, weight, or transport km).
- Waste reduction or circular economy initiatives.
- Resource efficiency performance.
- Carbon reduction initiatives implemented.
- Proposals for reducing the environmental impact of service delivery.
- Investment in or use of environmentally friendly technologies (e.g., energy-efficient office equipment, sustainable office supplies, low-carbon transportation, and paperless systems).



# Health, safety and wellbeing

## Mission

By working together to deliver on the commitments outlined below we can ensure safe, inclusive, and healthy environments for all. Shared commitment to high standards helps prevent harm, promotes wellbeing, and strengthens resilience across the supply chain.

Through proactive collaboration, we can embed good practice, raise awareness, and support continuous improvement in workplace safety and culture.

## Our commitments

- **Safe, healthy working environments:** We provide and maintain safe and secure working environments that support wellbeing and prevent harm.
- **Training and capability:** We upskill our people to meet evolving standards through training, tools and clear responsibilities.
- **Shared responsibility:** We work together to raise standards, reduce risk and enhance wellbeing across our operations.
- **Systems and continual improvement:** We embed robust policies supported by clear roles, regular reviews, and practical application.
- **Engagement and empowerment:** We promote a culture where people feel safe, included and empowered to contribute positively to continuous improvement and shared success.

## Supply chain standards

- **Provide and maintain safe and hygienic working conditions** including ventilation, lighting, temperature control, sanitation, and access to clean water.
- **Maintain effective systems** that support health, safety and wellbeing, underpinned by clear policies, procedures and risk assessments.
- **Work with us to raise standards** and continuously improve workplace health, safety and wellbeing.
- **Comply with our site-specific procedures** including building security, site access protocols, and emergency response procedures.
- **Actively engage with health, safety and wellbeing initiatives**, demonstrating proactive participation in training and responsible behaviours.

## Key performance indicators (KPIs) we may ask you to report on

- Your health, safety and wellbeing systems (e.g., how it is structured, integrated into day-to-day operations and the review process).
- Healthy and safety records of risk assessments, policy documents and insurance documentation.
- Certifications, audit outcomes, and incident records (e.g., near misses, ongoing investigations, enforcement notices and improvement actions).
- Training records and examples of engagement in initiatives that support health, safety and wellbeing.
- Evidence of compliance with site procedures and involvement in health, safety and wellbeing measures in on-site activities.





# Business ethics and integrity

## Mission

By working together to uphold the commitments and standards outlined below we can foster a culture of integrity and transparency across our supply chain.

By applying stringent, ethical business practices we will strengthen trust, promote fairness and ensure the wellbeing of our workers and communities. By aligning our actions with the highest standards of governance, we will not only protect against risks such as bribery and corruption but also create lasting, positive impact across our operations.

## Our commitments

- **Ethical standards:** We uphold the highest ethical standards and principles in all our dealings.
- **Bribery and anti-corruption:** We have a zero tolerance for bribery and corruption in any form (including any improper or illegal payments, gifts or hospitality).
- **No-conflict:** We ensure all business decisions are made in the best interests of the company and without bias.
- **Tax evasion:** We comply with all tax laws and regulations in the jurisdictions in which we operate.
- **Social media:** We maintain a responsible and respectful presence on social media platforms.
- **Payment code:** We pay our suppliers on time and according to agreed payment terms.

## Supply chain standards

- **Adhere to legal and ethical business practices** including a zero tolerance policy for bribery, corruption, extortion or other similar unethical practices.
- **Avoid conflicts of interest** and report any potential conflicts of interest to us.
- **Comply with anti-corruption laws** and maintain transparency in transactions.
- **Have procedures in place** to cover improper or illegal payments, gifts or hospitality.
- **Implement reasonable procedures** to prevent fraud, tax evasion or aggressive tax avoidance practices.
- **Ensure appropriate conduct** on all social media platforms.
- **Pay suppliers on time** and ensure there is a system in place to deal with supplier complaints and disputes.

## Key performance indicators (KPIs) we may ask you to report on

- Supplier certifications in social responsibility (e.g., ISO 26000).
- Worker complaints or violations.
- Workforce being paid the real living wage.
- Number of bribery-related incidents.
- Training completion rate on anti-bribery policies.
- Number of conflict-of-interest disclosures.
- Tax related audits or compliance certifications.
- Number of social media violations or breaches.
- Payments made to agreed payment terms.



# Human rights

## Mission

By working together to deliver on the commitments outlined below we can create a supply chain where human rights are respected, and dignity is preserved for every worker.

Our shared commitment to eradicating slavery, child labour, human trafficking, and inhumane treatment, will build a fairer and more transparent supply chain. By ensuring fair wages, respecting workers' rights to form unions, and limiting excessive overtime, we will promote a positive, safe, and respectful working environment.

## Our commitments

- **Promoting human rights and welfare:** We are committed to promoting human rights and welfare, including recognising and preventing human rights breaches and modern slavery in all its forms.
- **Modern slavery and forced labour:** We ensure that all our employees can make a free choice about their employment. We also support the elimination of modern slavery and forced and child labour across all our operations.
- **Fair pay and hours:** We ensure that wages meet or exceed national minimum standards. Overtime is voluntary and fairly compensated. We also exclude zero-hour contracts unless requested by the employee.
- **Freedom of association:** We respect our employees' right to form unions and seek representation.
- **Community development investment:** We invest in the welfare and sustainable development of the communities where we operate.

## Supply chain standards

**Uphold the standards and principles** enshrined in human rights standards and legislation (e.g., United Nations Universal Declaration of Human Rights (UNUDHR) and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work).

**Comply** with all applicable anti-slavery and human trafficking laws and regulations.

**Implement** policies and procedures that promote the **fair and responsible** treatment of workers to ensure that:

- All employees are employed voluntarily
- Forced and child labour is strictly prohibited
- All employees are paid fairly for the hours that they work and in line with national minimum standards

**Protect employees' rights to form and join trade unions**, to bargain collectively and to engage in peaceful assembly.

**Support and contribute to local communities** where you operate, investing in programmes that promote education, healthcare and sustainable developments.

## Key performance indicators (KPIs) we may ask you to report on

- Reported incidents of human rights violations (e.g., forced labour, child labour).
- Percentage of employees working overtime and, if possible, split between voluntary and compulsory overtime.
- Percentage of employees on zero-hour contracts.
- Employees trained in human rights and ethical labour practices.
- Employee retention rate.
- Amount invested in local communities, such as education, healthcare, and social welfare programs linked to supply chain operations.





# Diversity and inclusion

## Mission

By working together to uphold the commitments and standards outlined below we can foster a culture of equity, respect, and belonging across our supply chain. Embracing diversity and embedding inclusive practices strengthens collaboration, drives innovation, and reflects the communities we serve.

Through shared commitment, we can break down barriers, support underrepresented groups, and ensure everyone feels valued and empowered to thrive.

## Our commitments

- **Equity:** We strive for equity, fair treatment, access and equality of opportunity for everyone, working to remove barriers that might contribute to disadvantage.
- **Diversity:** We set measurable targets to help guide progress and inform actions that support improvements to the diversity of our workforce and leadership.
- **Inclusion:** We create a safe and open environment in which everyone feels heard, respected and supported, enabling people to collaborate effectively.

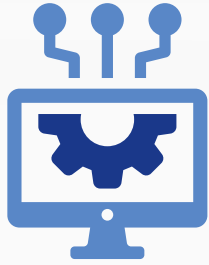
## Supply chain standards

- **Support the development** of an inclusive and diverse working environment, which promotes fairness and equal opportunities for all.
- **Ensure** employment decisions, including hiring, compensation, and promotion, are based on merit and free from bias, discrimination or harassment.
- **Provide a mechanism** for raising concerns and ensure timely, fair resolution of grievances without fear of retaliation.
- **Develop and maintain** policies that support diversity, equity and inclusion.

## Key performance indicators (KPIs) we may ask you to report on

- Workforce diversity statistics.
- Leadership diversity representation.
- Employee engagement or feedback scores.
- Existence and implementation of equity, diversity and inclusion policies and related practices.





# Information security, data privacy and intellectual property

## Mission

By working together to deliver on the commitments outlined below we can uphold the highest standards of information security, data privacy and intellectual property protection. We expect our suppliers to maintain the same standards while processing and managing personal data and sensitive information.

Through shared responsibility and robust safeguards, we can ensure the confidentiality, integrity and availability of the data we manage. Suppliers should stay aligned with evolving legislation and regulatory requirements to help maintain compliance and reduce risk.

## Our commitments

- **Safeguard the integrity and security of our systems:** We ensure that we have the appropriate safeguards, measures and infrastructure in place to protect and maintain data security. The system is certified to Cyber Essentials Plus.
- **To comply in full with all applicable data legislation:** We ensure that data governance is carried out and we are compliant with all applicable data legislation within all operational jurisdictions.
- **Ensure confidentiality, integrity and availability of data and sensitive information:** We follow the ISO 27001:2022 framework to ensure confidentiality, integrity and availability of data.
- **Only collect data that is required:** We only collect data which is required to fulfil our contractual obligations with our clients.
- **Managing data and cyber breaches:** We report any data and cyber breaches (including ransomware attacks) in line with our contractual and regulatory requirements.
- **Protection of intellectual property rights:** We protect our intellectual property rights and respect any applicable protections of the intellectual property rights of our clients and third parties.

## Supply chain standards

- **Appropriate technical framework and security:** Our suppliers should have the appropriate security in place to ensure the safety of our data.
- **Cyber security framework:** We expect our suppliers to have the appropriate framework (ideally Cyber Essentials/Plus, ISO 27001 or similar) in place to ensure data confidentiality, integrity and availability.
- **Comply:** You are required to comply with applicable data legislation in all operational jurisdictions.
- **Reporting data and cyber breaches:** You are required to report any data breaches and cyber attacks (including ransomware attacks) in line with contractual agreements and applicable legislation.
- **Protect and respect:** Protect and respect our intellectual property rights and those of our clients.
- **Comply:** Comply with any contractual or other guidelines (including our Branding Guidelines) in respect of the use and presentation of our intellectual property, and do not use our intellectual property without our prior written consent.

## Key performance indicators (KPIs) we may ask you to report on

- Reported data security incidents or breaches involving our data.
- Frequency and completion rates of security and data protection training.
- Policies and processes in place to protect shared personal data and sensitive information.
- Audit outcomes, including any data governance or IT infrastructure assessments.
- Data breach and incident response records.
- Sub-contractor(s) involved in the service provision.
- Where and how our intellectual property (and, if applicable, that of our clients) is stored, accessed or used in service delivery.



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