

SUPPLIER CODE OF CONDUCT

November 2022

Introduction

Through our sustainable procurement and supply chain management approach, we aim to provide value for money whilst delivering greater social, environmental and economic benefits across the whole lifecycle of our activities.

We recognise that there are important impacts, risks and opportunities within our supply chain and we expect our suppliers to join with us to embed sustainability into their operations, products and services.

This supplier code of conduct sets out the minimum not maximum standards we expect suppliers to meet, and we encourage suppliers to exceed these standards where they can.

Suppliers are expected to comply with all applicable legislation and, where the provisions of law and this code address the same subject, to apply the provision that affords the greater protection.

We do not expect suppliers to be perfect before they begin working with the College, but we do expect commitment, direct involvement and improvement over time.

We encourage all suppliers to have or to develop appropriate systems and controls to abide by our Supplier Code of Conduct and ensure that the following requirements are met both within their organisation and their supply chain.

1. Employment and welfare standards

Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The recognised standards, as set out in the annex, were used as references in preparing the Code and may be a useful source of additional information. The labour standards are:

This employment and welfare standards are drawn from the [Ethical Trading Initiative base code](#), recognised as good practice in this area.

Suppliers shall ensure that:

1.1 Freely chosen employment and modern slavery

1.1.1 There is no forced, bonded or involuntary prison labour

1.1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employers after reasonable notice

1.1.3 Suppliers are required to observe the spirit of the Modern Slavery Act 2015. Suppliers must ensure they are not directly engaged in slavery, servitude, forced and compulsory labour or human trafficking.

1.1.4 Suppliers must take steps they consider reasonable and proportionate, having regard to the nature of their business, to identify potential high and medium risks of slavery, servitude, forced and compulsory labour or human

trafficking in their supply chains. To the extent it is commercially practicable suppliers should use their buying power to influence their suppliers from such prohibited activities.

1.1.5 Suppliers must be prepared to provide to us the names and geographical locations of their own suppliers, to the extent that these are the source of products supplied to us.

1.1.6 Suppliers must permit any of the College's staff, consultants acting on its behalf, or similar to inspect the Supplier's premises and interact with workers without notice at any reasonable time. The Supplier must co-operate with any such inspection and notify the RCM of the outcome of an equivalent visit by a party not associated with the College.

1.2 Freedom of association

1.2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

1.2.2 Suppliers will adopt an open attitude towards the activities of trade unions and their organisational activities.

1.2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplaces.

1.2.4 Where the right to freedom of association and collective bargaining is restricted under law, the supplier will facilitate and does not hinder the development of parallel means for independent and free association and bargaining.

1.3 Child labour shall not be used

1.3.1 There shall be no new recruitment of child labour.

1.3.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; ("child" and "child labour" as defined by the ILO).

1.3.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

1.3.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

1.4 Living wages shall be paid

1.4.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

1.4.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

1.4.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

1.5 Reasonable working hours

1.5.1 Working hours must comply with national laws, collective agreements, and the provisions in section 1.5.2 below, whichever affords the greater protection for workers.

Sub-clauses are based on international labour standards.

1.5.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. *

1.5.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment.

1.5.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 1.5.5 below.

1.5.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

1.5.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

1.6 No discrimination

1.6.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

1.6.2 Opportunities will be pursued to increase diversity and inclusivity across all operations.

1.7 Regular employment is provided

1.7.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

1.7.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or homeworking arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

1.8 No harsh or inhumane treatment

1.8.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

2. Health and safety

2.1 Safe and hygienic working conditions

2.1.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

2.1.2 Workers are to be provided with appropriate, well-maintained personal protective equipment. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers. Workers should be encouraged to raise health and safety concerns.

2.1.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

2.1.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

2.1.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

2.1.6 Workers are to be provided with appropriate support so as to ensure their wellbeing and mental health.

3. Business ethics & economic development

3.1 Compliance with legislation and social norms

3.1.1 As a minimum, comply with all laws and regulations of the countries they are working in, manufacturing in or trading with, as applicable.

3.1.2 As a minimum, comply with all financial regulations and taxations of the countries they are working in, manufacturing in or trading with, as applicable.

3.2. Fair business practices

3.2.1 Not be involved in any way with acts of corruption or bribery, or support acts of conflict, violence or terrorism or abuse of individual people or communities.

3.2.2. Not force unsustainable or unfair contract terms on their suppliers, or throughout their supply chain, nor allow unfair exploitation of a dominant market or customer position.

3.2.3 Support fair trade conditions for producers, where applicable.

3.2.4 Appoint sub-contractors through an open and fair process such as public advertising of such opportunities wherever possible.

3.2.5 Act at all times with respect and integrity, including open and transparent accounting.

3.3 Whistleblowing

3.3.1 Provide an accessible whistleblowing service.

3.3.2 Allow staff protection if reporting misconduct or raising concerns with respect to their own, or another organisation, and ensure all affected staff are treated in a fair and transparent manner.

3.4 Community benefit

3.4.1 Seek out community benefit delivery in the locality of where the contract is performed (including publishing and delivering levels of local training and employment opportunities etc.).

4. Environmental compliance

4.1 Compliance with legislation

4.1.1 As a minimum, comply with all local and national environmental laws, regulations and directives of the countries they are working in, manufacturing in or trading with, as applicable.

4.2 Environmental impacts

4.2.1 Actively avoid causing environmental damage and/or negative environmental impact through manufacture and supply of the goods or services and disposal of supply chain waste.

4.2.2 Have a business plan in place, and be acting on it, to minimise their environmental impact year on year and adopting or working towards internationally recognised environmental standards and/or behaviours.

4.2.3 Encourage the development and use of environmentally friendly technologies.

4.2.4 Promote positive environmental impacts (such as reduced carbon emissions, better carbon management, waste management and water management, reduced pollution levels and technological improvements) through their activities wherever possible.