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SUPPLIER CODE OF CONDUCT

Introduction

Bidwells upholds a high standard of service across its client base, conducting business in a responsible and sustainable way. We believe this to include a responsibility to our clients to ensure that the best standard of practice is taking place not only within our business but also across all our external relationships. We strive to act ethically and value the principles of integrity, honesty and respect which we aim to apply consistently in our own actions and across our relationships, ensuring the best standard of performance for our clients.

To further these high standards, we believe it is important to share the key principles and best practice standards we consider crucial to sustaining effective and enduring business relationships with all third party suppliers and their affiliates and subcontractors, which provide goods or services to Bidwells in this Supplier Code of Conduct. We expect the Code of Conduct to be adhered to whilst always complying with all applicable laws and regulations.

We encourage Suppliers to comply with the principles as set out in this Supplier Code of Conduct, and any other relevant documents referenced within. We are grateful to Suppliers for their full support and understanding in this regard. Please note that the terms of this Supplier Code of Conduct are in addition to any other commercial or contractual terms agreed.

Ethics and Integrity

To meet social responsibilities, suppliers are required to conduct business in an ethical manner and act with integrity.

Suppliers should aim to provide equality of opportunity and treatment regardless of race, colour, gender, religion, nationality, sexual orientation, age, or disability. Suppliers are expected to support equal pay for work of equal value. Suppliers must oppose discrimination or intimidation towards employees including all forms or threats of physical and psychological abuse.

Hospitality and Gifts

Our gifts and hospitality policy require that all gifts and hospitality received by staff must be approved and recorded, in line with our Policy. Staff must exercise discretion when accepting gifts or hospitality. We would expect our Suppliers to respect that no employee should accept extravagant or excessive gifts or entertainment or accept gifts or entertainment with undue frequency. Invitations should not be offered if they could be construed as being unusual or risk creating a sense of obligation to the host or bias in their favour.

Diversity, Inclusion and Belonging

We are committed to promoting a culture where all of our employees feel included and able to fulfil their potential. Suppliers should also take active steps to promote diversity and inclusion in line with best practice and comply with relevant employment laws, regulations and standards. We may also request that Suppliers provide additional information in relation to their diversity and inclusion policies.

Modern Slavery

Bidwells ensures that all potential modern slavery risks related to its business are understood and that steps are in place that aims to ensure there is no slavery or human trafficking within its own firm, clients and supply chains. Bidwells Modern Slavery Statement reflects our commitment to acting in an ethical manner and with integrity in all of our Supplier relationships and to implementing and enforcing effective systems and controls to ensure that Modern Slavery and Human Trafficking is not taking place anywhere within our supply chains. We expect that all Suppliers will act in accordance with the UK Modern Slavery Act 2015 if applicable, or any similar laws in the countries in which they carry out business to ensure that no employee or individual working in any supply chain is being exploited. In addition, we would expect that all employees are working within a safe environment and that all relevant employment, health and safety and human rights laws and international standards are followed.

Anti-Bribery

We are committed to carrying out all business activities fairly, honestly and openly and operate a zero tolerance approach to any activity that could be perceived as an attempt or acceptance of bribery. We provide support to our staff in this area by maintaining appropriate policies, training and reporting procedures. Suppliers must operate the same approach, comply with all applicable laws and regulations and enforce robust governance and internal control systems in their supply chains taking account of the UK Bribery Act 2010 and any other applicable laws in the countries in which they operate.

Forced or involuntary labour

Suppliers must not participate in human trafficking; use forced, involuntary, or slave labour; or purchase materials or services from companies using forced, involuntary, or slave labour. They must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.

Compensation and working hours

Suppliers must comply with the appropriate wage and hour labour laws and regulations governing employee compensation and working hours. Suppliers should conduct operations in ways that limit overtime to a level that ensures a humane and productive work environment.

Child labour

Bidwells is opposed to the use of any form of child labour or practices that inhibit the development of children. Suppliers must comply with all child labour laws and should not employ anyone under the age of 15, or where it is higher, the mandatory school leaving age.

Health and Safety and Environment

Bidwells suppliers will make proper provision for the health, safety and welfare of their people, visitors and contractors and those in the community who may be affected by their activities. A safe and hygienic working environment should be provided and best occupational health and safety practice promoted, bearing in mind the prevailing knowledge of the industry, and of any specific hazards.

Suppliers are expected to conduct their operations in a way that minimises the impact on natural resources and protects the environment, customers, and employees. They must ensure their operations comply with all laws related to air emissions, water discharges, toxic substances, and hazardous waste disposal. Suppliers must maintain sufficient knowledge of input materials and components to ensure they were obtained from permissible sources, in compliance with laws and regulations. Suppliers may be required to validate this origin.

Risks assessment and risk management

Suppliers shall have a process to identify the environment, health and safety and labour practice and ethics risks associated with their operations. The process shall determine the relative significance of each risk and the

implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

Disclosure of information

Information regarding supplier's business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

Fair business and competition

Suppliers shall uphold all standards of fair business, advertising and competition, including all laws and regulations.

Whistle-blower protection and anonymous complaints

Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Suppliers shall protect whistle-blower confidentiality and prohibit retaliation.

Anti-Competitive Behaviour

Suppliers shall understand the different types of anti-competitive behaviours and to behave in a manner that cannot be deemed as anti-competitive. Sharing confidential information with competitors or Suppliers would be an example of this.

Data Protection

Bidwells endeavours to protect all data held within the business relating to both staff and clients. As will often be outlined in our legal contracts, we require Suppliers to protect any sensitive and/or confidential data which we may transfer to you and ensure compliance with all applicable Data Protection laws and regulations including the General Data Protection Regulation. Any potential or actual data breaches involving the exposure of Data without our consent needs to be reported immediately to GDPRinfo@bidwells.co.uk.

Supplier responsibility

Suppliers shall have a process to monitor their compliance to the Code and all applicable laws and regulations.

Continuous improvement

Suppliers are expected to continuously improve their performance in general and by implementing appropriate measures to help them comply with labour, health and safety and environmental standards required by this Code. Suppliers shall have a process for timely correction of deficiencies identified by assessments, inspections, investigations and reviews undertaken by themselves or other third-parties.