

Dept: Procurement
Author: Ross Steer
Authorised by: Group Head of Safety, Wellbeing & Operational Risk
Date reviewed: 01/08/2024
Date of Next Review: 01/07/2025
Accreditation/ Keywords: ISO 20400/ Bidwells Value
Doc. ref/version: GO_PRO_FW_POL_0006_01.1
Classification: External



SUPPLIER CODE OF CONDUCT

Scope

This Supplier Code of Conduct applies to all suppliers, vendors, contractors, and sub-contractors who provide goods, services, or labour to Bidwells, whether directly or indirectly. This includes, but is not limited to, suppliers of utilities and materials for Bidwells premises, as well as sub-contractors appointed by Bidwells to work on client sites. The Code is applicable to all tiers of the supply chain, ensuring that our commitment to ethical practices, legal compliance, and sustainability is upheld across all operations connected to our business. All third parties are expected to adhere to the principles outlined in this Code while also complying with all applicable laws and regulations in the jurisdictions where they operate.

Introduction

Bidwells upholds a high standard of service across its client base, conducting business in a responsible and sustainable way. As a Certified B Corp, we are committed to balancing purpose and profit, ensuring that our business operations positively impact our clients, employees, communities, and the environment. This certification reflects our dedication to the highest standards of verified social and environmental performance, public transparency, and legal accountability. This is in alignment with the [UN Sustainable Development Goals](#), which forms the universal call to action to end poverty, protect the planet and ensure that everyone enjoys peace and prosperity by 2030.

To further these high standards, and in alignment with the [ISO 20400:2017](#) Sustainable Procurement Guidance, we believe it is essential to share the key principles and best practices that we consider crucial to sustaining effective and enduring business relationships with all third-party suppliers, their affiliates, and subcontractors who provide goods or services to Bidwells. This Supplier Code of Conduct outlines these principles and practices, which we expect to be adhered to while ensuring full compliance 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. Please note that the terms of this Supplier Code of Conduct are in addition to any other commercial or contractual terms agreed.

Ethics, Integrity, and Anti-Bribery

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

Suppliers must operate a zero-tolerance approach to any activity that could be perceived as an attempt or acceptance of bribery. Suppliers should comply with all applicable laws and regulations and enforce robust governance and internal control systems in their supply chains, considering the UK Bribery Act 2010 and any other applicable laws in the countries in which they operate.

Diversity, Inclusion, and Supplier Diversity

We are committed to promoting a culture where all our employees feel included and able to fulfil their potential. Suppliers are expected to also take active steps to promote diversity, equity, 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.

Suppliers are encouraged to implement supplier diversity programs aiming to include businesses owned by underrepresented groups in their supply chains.

Modern Slavery and Forced Labour

Bidwells ensures that all potential modern slavery risks related to its business are understood and that steps are in place that aim 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 our Supplier relationships, and to implementing and enforcing effective systems and controls to ensure that Modern Slavery and Human Trafficking are 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 conduct business, to ensure that no employee or individual working in any supply chain is being exploited. In addition, we 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.

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.

Furthermore, we encourage our suppliers to respect the principles set down in the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the Declaration of the International Labour Organisation ([ILO](#)) on Fundamental Principles and Rights at Work, and the Ethical Trading Initiative ([ETI](#)) Base Code.

Right to Work Requirements

Suppliers must ensure that all employees engaged in providing goods or services to Bidwells are legally entitled to work in the country where they are employed. Suppliers are responsible for verifying the right to work status of their employees and must comply with all relevant immigration laws and regulations. This includes maintaining accurate records and documentation to demonstrate compliance with right to work requirements. Suppliers must not employ or subcontract individuals who do not have the legal right to work, and they should have robust processes in place to prevent illegal employment practices. Failure to comply with these requirements may result in the termination of the supplier relationship.

Compensation and Working Hours

Suppliers must comply with the appropriate wage and hour labour laws and regulations governing employee compensation and working hours. In addition, we strongly encourage suppliers to pay all employees at least the Living Wage, ensuring that workers are compensated fairly for their labour. 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.

Worker Protection

Suppliers shall provide training to their employees on the Workers Protection Act 2023 (which amends the Equality Act 2010) and shall take all reasonable steps to prevent [sexual harassment](#) within the workplace and in interactions with third parties.

Health, Safety, and Environmental Sustainability

Bidwells suppliers will make proper provision for the health, safety, and welfare of their people, visitors, 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 practices 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.

Suppliers are encouraged to align with international climate agreements such as the Paris Agreement and implement measures to reduce greenhouse gas emissions. Regular reporting on environmental impact, including carbon footprint, is expected. In addition, we encourage the support of sustainable and healthy materials and circular economy principles as mandated in Europe by the [EU Circular Economy Action Plan](#).

Payment Terms and Financial Integrity

Bidwells is committed to maintaining fair and transparent financial practices, including the timely payment of suppliers. We understand the importance of prompt payment in maintaining healthy business relationships and ensuring the smooth operation of the supply chain.

- **Payment Commitments:** Bidwells will pay all undisputed invoices within the established period in the supply contract or 30 days from the date of receipt, whichever is shorter, provided that all goods and services have been delivered in accordance with the agreed terms.
- **Supplier Expectations:** We expect our suppliers to extend the same commitment to prompt payment throughout their own supply chains. Suppliers are encouraged to adopt fair payment practices, ensuring that their sub-contractors and partners are also paid in a timely manner.
- **Financial Transparency:** Suppliers must maintain accurate financial records and be transparent about their financial dealings with Bidwells. This includes promptly addressing any payment disputes or discrepancies to ensure they are resolved without undue delay.

Fair Business, Competition, and Anti-Competitive Behaviour

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

Suppliers shall understand the different types of anti-competitive behaviours and 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 and Information Disclosure

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 need to be reported immediately to GDPRinfo@bidwells.co.uk.

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

Ethical AI and Technology Use

Suppliers should adopt principles for the ethical use of technology, including artificial intelligence. This

includes ensuring transparency, fairness, and accountability in their use of technology.

Risk Assessment and Management

Suppliers shall have a process to identify the environmental, health and safety, 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.

Whistle-Blower Protection and Anonymous Complaints

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

Contact Type	Speak Up Details
Contact/Email	Line Manager/Main Point of Contact
Contact/Email	HR Team
Email	kelly.bream@bidwells.co.uk or hannah.roman@bidwells.co.uk
'Protect' (independent whistleblowing charity)	Telephone: 020 3117 2520 Website: https://protect-advice.org.uk/
RICS 'Speaking Up'	Click here for details

Stakeholder Engagement

Suppliers are encouraged to engage with their stakeholders, including employees, customers, communities, and investors, to gather feedback and improve practices.

Supplier Responsibility and Continuous Improvement

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

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.

Conclusion

Bidwells values the commitment of its suppliers to uphold the principles outlined in this Supplier Code of Conduct. By adhering to these standards, suppliers contribute to the creation of a responsible and sustainable supply chain that benefits all stakeholders.