

# **SUPPLIER CODE OF CONDUCT**

## **Procurement Documentation**

**Document Issued and Verified by the Procurement Team  
January 2023**

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## **1. INTRODUCTION**

- 1.1. Oxford Brookes University (The University) sets out to ensure it maintains the highest standards. As such, we only work with suppliers who have the ability to consistently meet these standards and specifications, and are committed to values of conduct that are compatible with our own.
- 1.2. This Supplier Code of Conduct (the Code) sets out the minimum standards of behaviour and practices we require from our suppliers. We expect our suppliers to adhere to this Code, in addition to the provisions of any commercial terms agreed between The University and the supplier.
- 1.3. In the event that local law, regulation or rules impose stricter requirements than this Code, suppliers must comply with those requirements.
- 1.4. The Code is applicable to all suppliers, sub-contractors and partners (“Suppliers”) who supply product or services related to The University contracts or purchase orders. Suppliers are expected to cascade these values to their own suppliers in order to ensure alignment across the supply chain. This may involve the establishment of supply chain management processes that integrate the requirements of this Code.
- 1.5. If any employee of a supplier has an actual or potential ethical concern they are encouraged to make The University aware.

## **2. LAWS AND ETHICAL STANDARDS**

- 2.1. Suppliers shall comply with all laws applicable to its business.
- 2.2. The supplier should support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, the Ethical Trading Initiative base code, as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national law and practice.
- 2.3. Where the provisions of law, and this Supplier Code of Conduct, address the same issue, the provision that is most stringent shall apply.

## **3. LABOUR STANDARDS AND CONSIDERATIONS**

### **3.1. Child Labour**

- 3.1.1. We do not accept child labour or any practice that inhibits the development of children.
- 3.1.2. Suppliers must never use or support practices that inhibit the development of children.
- 3.1.3. Suppliers will not hire people under the age of 15, (or 14 where the International Labour Organisation exemption for developing countries allows) unless local minimum age law

stipulates a higher age for work or mandatory schooling, in which case the higher age would apply, as defined by the International Labour Organisation. Where local laws do not exist or where they set lower standards than the ILO, the ILO standards shall prevail.

- 3.1.4. Where a child worker must be displaced, adult family members should have the opportunity to assume the child's position in order to maintain family earnings.

### **3.2. Forced Labour**

- 3.2.1. All employment should be freely chosen.
- 3.2.2. Suppliers must not hold an individual or group in slavery or servitude. This includes any form of physical or mental coercion.
- 3.2.3. Suppliers must not use any form of involuntary labour including forced, compulsory, prison or debt-bonded labour.
- 3.2.4. Suppliers must not traffic individuals or groups for the purpose of labour exploitation.
- 3.2.5. Suppliers are expected to observe the Modern Slavery Act 2015.

### **3.3. Compensation and Working Hours**

- 3.3.1. Suppliers will ensure regular working hours must not exceed legal limits and over time must not exceed the maximum allowed by law.
- 3.3.2. Suppliers will ensure that overtime hours are compensated either according to the law, or where the law is silent workers must receive adequate compensation for any overtime worked.
- 3.3.3. Suppliers must ensure workers are provided at least one (1) day off during every seven (7) day period.

### **3.4. Freedom of Association**

- 3.4.1. Suppliers will recognise and respect that workers, without distinction, have the right to form or join trade unions of their own choosing and to bargain collectively.
- 3.4.2. Suppliers will comply with all applicable laws that pertain to freedom of association and collective bargaining.
- 3.4.3. Suppliers should not discriminate on the basis of affiliation or non-affiliation.
- 3.4.4. Suppliers should not allow interference by management in the organisation of workers.

3.4.5. Suppliers should not subject its employees to harassment, intimidation, or retaliation in their efforts to freely associate or bargain collectively.

3.4.6. Suppliers will provide a confidential and anonymous means for employees to raise grievances and will record this process.

## **4. ECONOMIC CONSIDERATIONS**

### **4.1. Wages and Benefits**

4.1.1. The University recognises that wages are essential to meeting employees' basic needs and the need to reward fairly for skill, contribution and performance.

4.1.2. Suppliers shall pay employees, as a minimum, at least the minimum wage required by local law or the prevailing industry wages, whichever is higher, and shall provide legally mandated benefits.

4.1.3. Suppliers will pay workers directly and provide workers with clear, written accounting of hours worked, deductions, and regular and overtime wages in a language they can understand.

4.1.4. Suppliers will provide all legally mandated benefits, such as public holidays, paid vacation/annual leave, sick days and maternity/paternity/family leave

### **4.2. Social Value – Local Opportunities**

4.2.1. The University is committed to building positive relationships with the communities in which we live and work.

4.2.2. Suppliers are encouraged to seek similar opportunities in their local communities.

4.2.3. Suppliers are expected to listen carefully to requests or concerns from the community and address them appropriately.

## **5. ETHICAL CONSIDERATIONS**

### **5.1. Bribery and Corruption**

5.1.1. The University has a zero tolerance policy for bribery and corruption.

5.1.2. Suppliers are expected to behave ethically in all business dealings.

5.1.3. Suppliers must not offer, give or accept anything of value that may be viewed as, or has the effect of, improperly influencing business decisions.

5.1.4. Suppliers must not offer or give gifts or hospitality to any employee that is intended as, or may be viewed as, an attempt to improperly influence business decisions.

#### **5.1.4.1. Improper Payments**

5.1.4.1.1. An “Improper Payment” is a bribe, kickback or facilitation payment.

5.1.4.1.2. The University prohibits the offering or making of improper payments, whether directly or indirectly through a third party. The University also prohibits the creation of false documents or records in connection with any improper payment. It is equally improper to seek or receive an improper payment (for example from a supplier to the University or a University employee). An offer or promise to pay is sufficient to attract liability, even if an improper payment is never actually made.

5.1.5. Suppliers must comply with all applicable anti-bribery and corruption laws and regulations of the countries in which they operate.

## **6. HARASSMENT AND/OR ABUSE**

6.1. The University does not engage in physical, mental, verbal, and sexual or any other abuse, inhumane or degrading treatment, corporal punishment or any form of harassment.

6.2. The University expects Suppliers to treat all employees with respect and dignity and to comply with local legislation on disciplinary practices.

6.3. Suppliers are to maintain formal written disciplinary procedure and these procedures must be clearly communicated to all employees and prospective employees. All disciplinary measures must be recorded and the employee(s) affected by disciplinary action must acknowledge the action in writing.

6.4. Suppliers will not establish monetary fines and/or take deductions from wages for disciplinary reasons.

6.5. Suppliers will establish written and/or verbal procedures for handling grievances from workers concerning workplace conditions and treatment.

6.6. Supplier will conduct security procedures in a gender-appropriate and non-intrusive manner, if applicable.

## **7. EQUALITY AND ANTI-DISCRIMINATION**

### **7.1. Fair and Equal Treatment and Discrimination**

7.1.1. Supplier’s terms and conditions of employment, including hiring, training, working conditions, compensation, benefits,

promotions, discipline, termination or retirement, are to be based on the individual's qualifications, performance, skills, and experience.

7.1.2. Supplier should maintain workplaces that are free from discrimination on the basis of race, colour, age, sex, gender or gender identity, caste, political opinion, national origin, religion, marital status, sexual orientation, disability or genetic information, maternity, membership, affiliation or any other status of the individual unrelated to the ability to perform the job.

7.1.3. Suppliers should not conduct medical tests on employees that can be used to discriminate (e.g. pregnancy testing). The results of any tests that are required by local legislation shall not be used in a discriminatory way

## **8. HEALTH AND SAFETY**

8.1. The University expects our suppliers to strive to implement the standards of occupational health and safety at a high level.

8.2. The supplier complies with applicable occupational health and safety regulations and provides a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work related illnesses.

8.3. Suppliers are expected to develop, implement and maintain a management system for managing health, safety and environmental risks. This system may be integrated into the supplier's business management system and associated processes, or act as a standalone health and safety management system. As a minimum this management system shall include processes for:

8.3.1. Identifying, assessing and managing health and safety risks and opportunities

8.3.2. Planning improvements and establishing objectives and targets where applicable

8.3.3. Identifying and delivering learning relevant to identified risks

8.3.4. Monitoring performance

8.3.5. Assurance of the effective management of health and safety risks Suppliers are encouraged to have management systems in place.

8.4. Suppliers who carry out activities on our premises, in our facilities or under our direct control shall follow the requirements set out in the University's health and safety procedures.

## **9. ENVIRONMENTAL COMMITMENT**

9.1. Suppliers must select or manufacture products or undertake works or services in a way which helps to protect the earth's natural resources and biodiversity.

- 9.2. Suppliers are to fully understand the environmental impacts of their business throughout all of its activities from design, production, and delivery, and use to end of life disposal of their supplied products or services and continually seek to minimise negative impacts.
- 9.3. Suppliers shall ensure all waste materials, as a by-product of production, are disposed of properly in an environmentally responsible manner and according to the local and international laws and regulations.
- 9.4. Suppliers are to seek out leading industry practices aimed at conserving natural resources and reducing carbon emissions.
- 9.5. Suppliers shall commit to packaging standards that minimise the amount of materials used and where possible use materials that have significant recycled content.
- 9.6. Suppliers are to ensure compliance with third party, bona fide, local and international standards for materials and ethical conduct.

## **10. DATA PROTECTION & INFORMATION SECURITY**

- 10.1. The University is committed to maintaining the confidentiality, integrity and availability of its information assets and recognises the important role suppliers play in this.
- 10.2. All suppliers with access to the University personal data (provided either directly or indirectly) must comply with the UK Data Protection Act 2018 (and associated privacy legislation) and be prepared to provide evidence of compliance to the University.
- 10.3. All suppliers are expected to have nominated contacts for data protection and / or information security management.
- 10.4. The University expects all suppliers to consider the information risks associated with provision of goods and services to us and assess how such risks can be effectively reduced or otherwise managed.
- 10.5. The University expects suppliers to align their information security management approach to a recognised framework such as: ISO27001:2013; CyberEssentials Plus; NIST SP 800-53; or PCI-DSS and to consider independent audit and certification.
- 10.6. Suppliers should promptly inform the University of all information security and data protection incidents, breaches, near-misses and vulnerabilities that affect, or have the potential to affect, University information assets and / or University systems.

## **11. COMPLIANCE PROCEDURES**

- 11.1. The University expects all its suppliers to respect its Supplier Code of Conduct and to actively do their utmost to achieve the University's standards.
- 11.2. The University believes in cooperation and the University is willing to work with its suppliers to improve performance where necessary.
- 11.3. The University may require that suppliers provide details on factory and production facility locations of suppliers and subcontractors and may make this information publicly available (i.e. annual reports, web site postings, etc.).
- 11.4. The University reserves the right to ask for proof of compliance with all applicable labour, health, safety, and environmental laws, and may inspect working conditions, at any time (or request independent verification of compliance).
- 11.5. Suppliers must maintain current and sufficiently detailed records to substantiate their compliance with the Supplier Code of Conduct and the University may ask that they are independently verified at the supplier's expense.