**BARKER BRETTELL**

**SUPPLIER CODE OF CONDUCT V1**

**MARCH 2022 – CLAIRE HUNT**

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# **Introduction**

Barker Brettell is committed to conducting its business in an ethical, legal, and socially responsible manner, embracing internationally recognized standards for business integrity, human rights, and environmental sustainability. We see this as a shared commitment that extends to our vendors, contractors (including subcontractors), consultants and other providers (each a “Supplier”).

This Supplier Code of Conduct (“Code”) defines the basic business practices we require of our Suppliers and should be regarded as a minimum standard that operates in addition to, and not in replacement of, a Supplier’s existing legal and contractual obligations to Barker Brettell.

We expect our suppliers to share our commitments and approach and we state below guidelines that we require of all our suppliers. We expect them to adhere to the guidelines and to confirm in signing up to this code that they expect these requirements also of their supply chain, including sub-contractors. By collaborative working we believe we can jointly have a positive impact on society.

# **General Disclaimer**

This code does not dilute a Supplier’s legal obligations, and supplements, and does not supersede the contracts between Barker Brettell and the Suppliers.

# **Compliance with Laws**

Suppliers must comply with all applicable laws and regulations of the countries in which operations are managed or services provided. When conducting international business, Suppliers must comply with applicable local and international laws and regulations. This includes, but is not limited to, laws and regulations relating to the environment, occupational health and safety, labour practices, International Labour Organisation (ILO) conventions, trade control, fair competition, anti-money laundering, anti-bribery and anti-corruption.

## **Anti-Corruption Laws**

* + Suppliers must adhere to the highest standards of moral and ethical conduct and comply with applicable national and international anti-bribery and anti-corruption laws, directives and regulations including the UK Bribery Act and any analogous legislation of this and any other jurisdictions.

## **Fraud**

* + Every form of fraud is prohibited

## **Competition and Anti-Trust**

Suppliers must always engage in fair and honest competitive business practices. Suppliers shall comply with all applicable anti-trust and competition laws in every jurisdiction where their operations are conducted

## **Money Laundering and Tax Evasion**

Suppliers must always:

* + Comply with anti-money laundering laws and regulations
  + Comply with tax laws and regulations in the jurisdiction in which they operate
  + Act carefully to prevent Barker Brettell from being involved or used in money laundering, tax evasion or other criminal activities: and
  + Recognise and monitor potential warning signals that could help detect unusual or suspicious activity

## **Conflict of Interest**

Suppliers must always:

* + Completely and truthfully disclose, in writing, any actual, potential, or perceived conflicts of interest to their Barker Brettell contact before entering negotiations and/or starting a business relationship with Barker Brettell.
  + Promptly disclose in writing to their Barker Brettell contact any conflicts of interest arising during their business relationship with Barker Brettell.
  + Avoid any conflicts of interest, whether actual, potential, or perceived, that are not properly disclosed and mitigated.

# **Employment Practices**

## **Underage Labour**

Suppliers shall ensure that no underage labour has been used in the production or distribution of goods and services.

## **Forced Labour**

Suppliers will not use or tolerate in their supply chain any form of slavery, servitude, indentured, bonded, involuntary prison, military or compulsory labour or any form of human trafficking.

## **Working Hours**

Suppliers must ensure working hours comply with national laws and standards and should not expect workers to work (including overtime) in excess of hours set out in relevant working time legislation

## **Healthy and Safe Working Conditions**

Suppliers must provide safe and clean conditions for workers at sites of working and residential facilities.

## **Discrimination**

An inclusive and diverse work environment is encouraged, with equal opportunities for all workers. All employees must be treated fairly and not discriminated against in any form of employment.

# **Information Protection**

## **Confidential/Proprietary Information**

Suppliers shall protect all sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose other than the business purpose for which it was provided unless there is prior authorisation from the owner of the information.

## **Intellectual Property**

Suppliers shall respect the intellectual property rights of others, including Barker Brettell, its affiliates and business partners. Suppliers must comply with all applicable laws governing intellectual property rights, including IP designated as a trade secret, as confidential, or that is subject to patents, copyrights, or trade mark restrictions.

## **Information Security**

Privacy, and data and information security are of the utmost importance to Barker Brettell. Suppliers shall protect personal data and confidential and proprietary information of Barker Brettell and others, from unauthorised access, use, modification, destruction, and disclosure through appropriate physical and electronic security procedures. Suppliers must evaluate the data collected from possible data subjects and the applicability of the General Data Protection Regulation (GDPR) to its business and its relationship with Barker Brettell and take appropriate measures to ensure its compliance with this and all applicable data and privacy laws.

# **Reporting Violations**

Suppliers must report to Barker Brettell any questionable conduct, including conduct of any Barker Brettell employee, that the Supplier believes in good faith to be an actual, apparent, or potential violation of this Code.

# **Compliance with Code**

This Supplier Code of Conduct is intended to promote a culture within our supply chain that complies with not only the letter, but also the spirit, of all applicable laws, rules, and regulations.

You should refer to the principles set out in this Supplier Code of Conduct when ethical and compliance issues arise. Each of the principles in this Supplier Code of Conduct is fundamental to how we do business. However, this Supplier Code of Conduct cannot anticipate every possible instance in which an ethical issue may arise, and so it aims to reinforce the ethical and responsible way in which we require you to conduct your business and the integrity, honesty and transparency which is required in your operations.