

The Cotswold Group

Supplier Code of Conduct



The Cotswold Group Code of Conduct for Suppliers

This Code of Conduct defines the basic requirements placed on The Cotswold Group suppliers of goods and services concerning their responsibilities towards their stakeholders and the environment.

The Cotswold Group reserves the right to reasonably change the requirements of this Code of Conduct due to changes of The Cotswold Group Compliance Program. In such event The Cotswold Group expects the supplier to accept such reasonable changes.

The Cotswold Group reserves the right to review the policies & procedures of the supplier and audit these where appropriate.

The supplier declares herewith:

- Legal compliance
 - To comply with the laws of the applicable legal system(s).
- Business ethics
 - To have appropriate business ethics policies and procedures. These must be in the appropriate local language(s) and distributed to employees, suppliers and agents. Suppliers must be committed to the highest standards of ethical conduct when dealing with workers, suppliers, and customers.
- Prohibition of corruption and bribery
 - To tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government or public official for the purpose of influencing decision making in violation of law;
 - To maintain adequate procedures to prevent employees and others performing services on their behalf from paying and receiving bribes.
 - To comply with UK Bribery Act, USA Foreign Corrupt Practices Act (FCPA), and any other relevant international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate,
- Respect for the basic human rights of employees
 - To promote equal opportunities for and treatment of its employees irrespective of, race, nationality, social background, disabilities, sexual orientation, pregnancy or maternity, political or religious conviction, sex, age; marital or civil partnership status or any other factor which cannot be justified.
 - To respect the personal dignity, privacy and rights of each individual;
 - To refuse to employ or make anyone work against his will;
 - To refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
 - To prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
 - To provide fair remuneration and to guarantee the applicable national statutory minimum wage, union agreements or industry standards;
 - To comply with the maximum number of working hours laid down in the applicable laws;
 - To recognise, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organisations or trade unions.
- Prohibition of child labour
 - To employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.

- Health and safety of employees
 - To take responsibility for the health and safety of its employees;
 - To control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
 - To provide training and ensure that employees are educated in health and safety issues;
 - To set up or use a reasonable occupational health & safety management system.
 - To comply with all relevant local laws and regulations.
- Environmental protection
 - To act in accordance with the applicable statutory and international standards regarding environmental protection;
 - To minimise environmental pollution and make continuous improvements in environmental protection;
 - To provide The Cotswold Group with details of their environmental policy
 - To set up or use a reasonable environmental management system and demonstrate a commitment to reducing their environmental impact
 - The Cotswold Group may require measurement of supplier carbon emissions as part of a Scope 3 GHG measurement requirement.
- Supply chain
 - To use reasonable efforts to promote among its suppliers compliance with this Code of Conduct;
 - To provide The Cotswold Group with details of their diversity and inclusion policy and where requested provide evidence of how this policy is put into practice
 - To be committed to ensuring its supplier selection processes are transparent, objective and non-discriminatory and provide fair and equal opportunities for all organisations including Small and Medium Enterprises (SMEs), Black Asian and Minority Ethnic (BAME), and organisations owned by under-represented groups".
 - To confirm the ability to report periodically to The Cotswold Group on workforce demographics and other diversity related issues as required
- Sustainability
 - To seek to operate in a manner which provides benefits to society and the economy, whilst minimising damage to the environment
 - To give consideration to the economic, environmental and social consequences of its choice of design, materials, manufacture, production, logistics, service delivery, operation, maintenance, recycling and disposal and to how best to address these consequences.
- Screening of employees
 - Where specially required by The Cotswold Group to undertake employee screening in line with industry standard for all employees who directly provide services to The Cotswold Group
- Documentation and Records
 - To have processes to identify, monitor, and understand applicable laws and regulations and the additional requirements imposed by this Code.
 - To obtain, maintain and keep current a valid business license as required by applicable laws and regulations.
- Management Commitment
 - To adopt or establish a management system designed to ensure compliance with this Code and applicable laws and regulations, identify and mitigate related operational risks, and facilitate continuous improvement