

Supply Chain Code of Conduct



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1

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1. Introduction

- 1.1. It is the policy of Peel L&P Group Management Limited Peel Group Management Limited and its subsidiary companies (Peel), to conduct all of its business in an honest and ethical manner. Peel takes a zero-tolerance approach to breach of its policies. Further detail can be found in Appendix 1 Supply Chain Guide to Peel Policies.
- 1.2. Peel's own Financial Policies outlines the standard of conduct expected from individuals working at Peel. This Supply Chain Code of Conduct highlights the specific values and principles which Peel expect its supply chain to embrace and put into practice.
- 1.3. This document is relevant to all Peel's suppliers, contractors, supplier sub-contractors, consultants and development partners or any other person or persons associated with Peel from a supply chain perspective at any level of the organisation.
- 1.4. Peel is committed to acting professionally, fairly, honestly and with integrity in all its business dealings and relationships wherever it operates, implementing and enforcing effective systems to malpractice as set out in this document.
- 1.5. Peel will uphold all laws relevant to the content of its policies in all the jurisdictions in which it operates. Peel does, however, remain bound by the laws and Acts of the UK in respect of its conduct both at home and abroad.
- 1.6. The overarching goal of a supply chain code of conduct is to instil financial and social transparency in the supply chain, with the intention of creating accountability and full disclosure arounds issues such as human rights, health and safety and environmental impacts.
- 1.7. Peel is committed to deliver excellent services that represent value for money. Peel's values depend on its supply chain as an extension of Peel's capability and recognises that its supply chain play an important role in the delivery of these services and are critical to delivering on Peel's commitments.

2. Objective

- 2.1. The overall objective of the Peel Supply Chain Code of Conduct is to build open and trusting relationships with its supply chain partners in order to drive improved performance, provide value for money and

set out the behaviours and compliance that Peel expects from its supply chain.

- 2.2. Peel expects its supply chain, in delivering goods and services on behalf of Peel, wherever they operate, to act in a manner that is compatible with and upholds Peel's values, promotes innovation and expertise and contributes to Peel's growth in a positive manner.
- 2.3. Peel expects this Supply Chain Code of Conduct to be communicated to all those within in its supply chain including but not limited to its employees, parent company, subsidiaries and sub-contractors.

3. Key Principles

- 3.1. Peel expects its supply chain to adhere to the key principles set out in this policy and any subsequent requirements and controls which Peel may request, including without limitation to:
 - 3.1.1. comply with all applicable legislation and standards;
 - 3.1.2. adopt fair and ethical employment practices;
 - 3.1.3. take steps to identify and reduce risks of child labour, human trafficking and modern slavery in its supply chain;
 - 3.1.4. provide the National Minimum Wage (for those of at least school leaving age) and National Living Wage (for those aged 23 years and over within its supply chain);
 - 3.1.5. take active steps to disclose and manage any actual, potential, or perceived conflicts of interest in relation to its engagement with Peel;
 - 3.1.6. refrain from offering gifts to Peel employees, and to only offer hospitality in line with the Peel's policy on entertainment and gifts;
 - 3.1.7. promote equal opportunities for all and embrace diversity in its workplace;
 - 3.1.8. take steps to reduce the environmental impacts of its products or services;
 - 3.1.9. take opportunities to make a positive impact in its local community;

- 3.1.10. take a proactive approach to the wellbeing of its workforce and provide a safe working environment for its employees and those affected by its activities;
- 3.1.11. have proportionate business continuity capabilities in place, based on how critical its service is to Peel;
- 3.1.12. comply with all applicable data protection laws, contractual obligations and associated risk management procedures;
- 3.1.13. notify Peel if it becomes aware of any security incident that may affect Peel data or assets;
- 3.1.14. comply with Peel's information and cyber security requirements and standards.

4. Compliance

- 4.1. This Supply Chain Code of Conduct is intended to set out the way in which Peel and its suppliers behave towards each other. The provisions of this Code should be regarded as part of the contractual agreement with Peel. However, it is not intended to undermine Peel's contracts with its suppliers or the rules set out when procuring Peel goods and services, which at all times shall take precedence. For the avoidance of doubt, the Supply Chain Code of Conduct does not take precedence where the courts or other institutions such as a regulatory agency, authority or body have jurisdiction.
- 4.2. Suppliers who provide goods and services to Peel are expected to comply with all aspects of this Supply Chain Code of Conduct. Both parties should be open and transparent with each other and report any instances of non-compliance. In these circumstances, the first step is for Peel and the supplier to discuss and, where appropriate, agree suitable remedial actions. If a party considers that an issue has not been resolved by discussion, it may be escalated to Paul Chappels.

5. Employees and Service End Users

- 5.1. Respectful Treatment:
 - 5.1.1. Peel expects that its employees, those of Peel's supply chain, and service end users (stakeholders) have the right to respectful treatment.
 - 5.1.2. Peel will not tolerate discrimination, harassment or victimisation in the workplace or in connection with any

supply service. Peel expects its supply chain to provide the same commitment, including to their own employees.

- 5.1.3. The Equality Act 2010 protects against discrimination, harassment and victimisation. Peel expects that its supply chain does not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender/gender identity, marital status, sexual orientation, union membership or political affiliation.
- 5.1.4. Peel requires that its supply chain obligations to employees under labour or social security laws and regulations arising from regular employment relationship shall not be avoided through the excessive use of labour only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.
- 5.1.5. Peel does not tolerate within its supply chain physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.

5.2. Professional Behaviour:

- 5.2.1. Peel expects to work constructively and collaboratively with its supply chain. Peel expects suppliers to be prepared to invest in their relationships with Peel and establish trust with Peel's staff and with other suppliers involved in delivery.
- 5.2.2. Peel expects suppliers to be able to speak out when other people or other suppliers are not upholding the values embedded in this Supply Chain Code of Conduct.
- 5.2.3. Peel also expects its suppliers to speak out, without fear of consequences, when a project or service is unlikely to succeed because of Peel's behaviours or a lack of good governance. Peel expects the same behaviour when a contract is no longer fit for purpose, for example, in its contractual stipulations or measures.

5.3. Meeting Peel Stakeholder Needs:

- 5.3.1. Peel expects that contracts with Peel's suppliers meet the needs of Peel's service end users – its stakeholders. Peel will work together with its supply chain to articulate these

outcomes to ensure that the goods and services being provided meet the needs of end users. Peel expects fully reciprocal behaviour from its suppliers.

5.4. Human Rights and Employment Law:

- 5.4.1. Peel requires that its supply chain must comply with all applicable human rights and employment laws in the jurisdictions in which they work and not be engaged in slavery, servitude, forced or compulsory labour or human trafficking.
- 5.4.2. Peel expects that its supply chain shall take reasonable and proportionate steps, having regard to the nature of their business, to identify potential high and medium risks of slavery, servitude, forced and compulsory labour or human trafficking in their supply chains.
- 5.4.3. To the extent it is commercially practicable, Peel's supply chain should use their buying power to influence their suppliers from such prohibited activities. This includes complying with the provisions of the Modern Slavery Act 2015.
- 5.4.4. Peel expects that its supply chain provides all workers with written and understandable information about their employment conditions and wages before they enter its employment. Suppliers must have robust means of ensuring that their sub-contractors in their supply chain are also compliant.

5.5. Diversity and Inclusion:

- 5.5.1. Peel requires its supply chain to promote equal opportunities for all and embrace diversity in the workplace.
- 5.5.2. Peel expects its supply chain to have a policy which explicitly prohibits discrimination including on the grounds of the protected characteristics stated in the Equality Act 2010 (age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex, sexual orientation).
- 5.5.3. Suppliers are expected to take active steps to prevent any form of discrimination on these grounds and embed the requirements of the Equality Act 2010 (or equivalent local legislation if providing services from outside the UK) and

ensure its services are inclusive and accessible to all intended users, including individuals with disabilities.

5.6. Wellbeing:

- 5.6.1. Peel requires its supply chain to comply with applicable occupational health and safety regulations by providing a workplace that is conducive to the good health and wellbeing of its employees and supporting its employees mental and physical health by taking a proactive approach to the wellbeing of its workforce and building an inclusive culture. This could take the form of initiatives to support wellbeing, including a healthy work and family balance and provision of employee benefits designed to enhance wellbeing.

6. Business Practices

6.1. Management of Risk:

- 6.1.1. Peel does not expect its suppliers to pass down risk inappropriately to its sub-contractors, and not to assert that they can manage risk that is in fact better managed by the supplier.
- 6.1.2. All parties should be prepared to share intelligence of supply chain risks, so that material commercial and operational risks, for example, the impact of losing a key supplier can be mitigated.
- 6.1.3. Peel expects its suppliers of critical services to develop contingency plans, deployable in the event of a corporate insolvency or other such event to ensure that critical services continue.

6.2. Health and Safety:

- 6.2.1. Peel expects its supply chain to achieve high standards in health, safety and welfare for all of its staff, contractors and visitors and provide a safe working environment for its employees.
- 6.2.2. Suppliers are expected to have a policy, or equivalent statement, outlining its approach to Health & Safety or evidence of arrangements to actively meet its duties including:

- 6.2.2.1. complying with relevant health and safety legislation;

- 6.2.2.2. having arrangements in place which effectively reduce and prevent incidents, accidents, or occupational ill health;
 - 6.2.2.3. having risk management procedures demonstrating how health and safety risks are identified;
 - 6.2.2.4. assessing, managing and can demonstrate how appropriate controls and safe working procedures are implemented.
- 6.3. Business Continuity:
- 6.3.1. Peel requires its supply chain to have a robust and flexible capability to respond quickly to, manage, and recover safely from disruptive events.
 - 6.3.2. Suppliers should have proportionate business continuity capabilities in place, based on how critical its service is to Peel this should include:
 - 6.3.2.1. a policy which describes how it will recover following a disruptive event;
 - 6.3.2.2. a fit-for-purpose Business Continuity Plan that has been reviewed/exercised at an appropriate frequency;
 - 6.3.2.3. an ongoing business continuity testing and exercising programme and when applicable, a post exercise report, which outlines any remediation plans or consequential changes to its operations.
- 6.4. Continuous Improvement:
- 6.4.1. Peel requires its supply chain to use recognised industry practices in the delivery of goods and services to, or on behalf of Peel.
 - 6.4.2. Peel also expects its supply chain to continuously improve these goods and services and bring innovation, ideas and expertise to help Peel address its strategic challenges and growth.
 - 6.4.3. Peel will endeavour to create the right conditions to allow its supply chain to innovate both during the procurement process and during the life of a contract and where appropriate Peel

will inform its supply chain of its innovation requirements during the procurement process.

6.5. End-to-End Delivery:

6.5.1. Some of the services that Peel requires are complex, and no single supplier will have complete contractual responsibility for every element of what is needed to deliver to the end service user. In such cases, Peel will endeavour to create and maintain a culture that facilitates collaboration between all suppliers to ensure that the right service outcomes are achieved. In order to achieve this, Peel expect suppliers to be aware of how they contribute to that overall delivery, and to work collaboratively with Peel and other suppliers to manage mutual dependencies and ensure that their product or service is used effectively in the delivery of a high standard of service.

6.6. Value For Money:

6.6.1. Peel expects to obtain value for money in all of its activities. This means that contracts should be priced to offer sustainable value throughout their life, including when changes are needed.

6.6.2. Whilst Peel accepts that its suppliers make a fair profit margin in return for the risk they are accepting and the commitments and investments they make in order to be able to deliver services for Peel, Peel expects its supply chain not to exploit an incumbent or monopoly position, an urgent situation or an asymmetry of capability or information to impose opportunistic or anti-competitive pricing.

6.6.3. Peel will engage constructively with its supply chain in relation to any required changes in the delivery of goods and services and expect suppliers to reciprocate this.

6.6.4. Peel expects its supply chain to work in good faith to resolve any disputes promptly and fairly during the life of a contract through good relationship management and where appropriate, contractual dispute resolution mechanisms, recognising that both of the parties' interests are rarely best served by protracted litigation.

6.6.5. Peel will seek to award contracts based on a number of factors, including without limitation value for money which includes price and quality and based on its suite of

sustainability and environmental, social and governance (ESG) policies Peel will measure supplier performance on relevant and proportionate indicators and apply proportionate contractual remedies for non-compliance.

6.7. Reputation:

- 6.7.1. Peel wishes to work with suppliers who are proud of their reputation for fair dealing and quality delivery.
- 6.7.2. Peel wishes working with them to be seen as reputation enhancing for its supply chain.
- 6.7.3. Peel expects its supply chain to be mindful of the need to maintain trust and protection of Peel's reputation, and ensure that neither they, nor any of their partners or subcontractors, bring Peel into disrepute by engaging in any act or omission which is reasonably likely to diminish the reputation of Peel. This is not intended to limit any supplier's legal obligations.

6.8. Cyber Security and Data Protection:

- 6.8.1. Peel requires its supply chain to safeguard the integrity and security of their systems and comply with the relevant Peel policies. Data protection and privacy laws regulate the collection, storage, disposal, use and disclosure of personal information (such as names, addresses, dates of births, job titles or photographs), which can identify a living person and must be strictly adhered to.
- 6.8.2. Peel expects its supply chain to:
 - 6.8.2.1. process personal information in a fair, lawful and transparent manner;
 - 6.8.2.2. only collect the personal information required to fulfil the service it is providing and to not further process information in a manner that is incompatible with the service;
 - 6.8.2.3. take steps to ensure personal information remains accurate and up to date;
 - 6.8.2.4. have a retention schedule to ensure personal information is not retained longer than is necessary;

- 6.8.2.5. implement organisational and technical measures to ensure the integrity and confidentiality of personal information;
 - 6.8.2.6. reasonably cooperate with and assist on data protection impact assessments or compliance matters which relate to the processing activities that it is carrying out on behalf of Peel.
- 6.8.3. Peel's supply chain must have policies that include:
- 6.8.3.1. defining and publishing within their organisation a policy or set of policies which sets out security and privacy controls relating to all of their information and IT systems where applicable, and services provided to Peel with copies of such policies being made available to Peel, upon request;
 - 6.8.3.2. defining and publishing an acceptable usage policy which clearly defines employee responsibilities when using corporate assets, including data;
 - 6.8.3.3. have the ability to annually test service recovery procedures, to ensure Peel services are recovered as agreed by Peel;
 - 6.8.3.4. maintaining an asset inventory relevant to the services provided to Peel;
 - 6.8.3.5. ensuring networks are controlled such as firewalls and VPN, and protected against any unauthorised access, having in place an adequate vulnerability management programme including annual penetration tests patch management and vulnerability scanning;
 - 6.8.3.6. providing security and privacy awareness training to employees involved in the delivery of Peel services;
 - 6.8.3.7. providing enhanced training to individuals including subcontractors and supply chain employees where applicable, in high risk roles;
 - 6.8.3.8. having an adequate change control management process;
 - 6.8.3.9. complying with all applicable data protection laws including UK GDPR and Data Protection Act 2018,

contractual obligations and associated risk management procedures informing Peel within a contractually defined period where an incident or a personal data breach occurs impacting services;

6.8.3.10. ensuring any sub-contractor in connection with the provision of the services complies with the specified security and privacy requirements at all times;

6.8.3.11. informing Peel immediately if they become aware of any cyber security incident that affects or has the potential to affect Peel's data.

6.9. Physical and Personnel Security:

6.9.1. Peel expects its supply chain to protect the assets entrusted with it. This includes people and property.

6.9.2. Suppliers should comply with Peel's physical and personal security requirements and standards, and to notify Peel of any security incident that may affect Peel's assets including appropriate security controls for sub-contractors and supply chains and procedures for the timely identification and management of incidents.

6.10. Environment and Sustainability:

6.10.1. Peel requires its suppliers to identify key environmental impacts of its products, services and supply chain, and to take ongoing steps to reduce these in line with best practice in its sector.

6.10.2. Peel expects its supply chain to assist Peel in the understanding and reduction of its impacts on the environment and associated risks such as evidence of a policy that describes its approach to reducing key environmental impacts and complying with environmental legislation including evidence of actions taken to minimise the environmental impacts of its products and services, for example, carbon reduction plan/policy, carbon certification, carbon footprint, waste management plan and environmental standards.

6.10.3. Suppliers should provide environmental information about its products or services, and associated use of resources with

evidence of having considered its exposure to climate-related risk (physical, liability and transition risks).

- 6.10.4. Peel expects its supply chain to be open and transparent in assisting Peel in reporting on product or service utilisation and any environmental impacts.
- 6.10.5. Peel expects its suppliers to provide evidence of its journey via its total supply chain to a net zero position.
- 6.10.6. Continually improve its environmental performance and results and to review them on a regular basis.

6.11. Community:

6.11.1. Peel expects its supply chain to use its influence and experience to create a positive impact in society, inspiring individuals to get involved with their community and charitable causes. In agreement with Peel and in accordance with Peel's Anti-Bribery and Corruption Policy, this could take the form of charitable or philanthropic causes such as:

- 6.11.1.1. fundraising;
- 6.11.1.2. donations in kind;
- 6.11.1.3. pro-bono work;
- 6.11.1.4. initiatives to offer opportunities for young people and encourage social mobility such as work placements and apprenticeships.

6.12. Confidentiality:

- 6.12.1. Peel expects its supply chain to comply with the provisions in Peel's contracts and any legal requirements to protect commercial and sensitive information.
- 6.12.2. Peel and its supply chain may both also be party to confidential information that is necessary to be effective partners. This information, even if it is not covered by contractual provisions, should be handled with the same care as information of similar sensitivity.
- 6.12.3. Notwithstanding this mutual understanding, Peel's supply chain should recognise that this does not prevent Peel from

disclosing information where it is compelled to do so, for example, by law.

6.13. Conflicts of Interest:

- 6.13.1. Peel expects its supply chain to mitigate appropriately against any real or perceived conflict of interest through their activities with Peel.
- 6.13.2. Suppliers with a position of influence gained through a contract should not use that position to unfairly disadvantage any other supplier or reduce the potential for future competition, for example by creating a technical solution that locks in the supplier's own goods or services.
- 6.13.3. Suppliers shall avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work with Peel.
- 6.13.4. Suppliers should not act or take decisions in order to gain financial or other material benefits for themselves, relatives, friends and close associates, other than payment from Peel for the services they are contracted for.
- 6.13.5. Suppliers should take active steps to disclose and manage any actual, potential or perceived conflicts of interest in relation to its engagement with Peel.

7. Standards of Behaviour

7.1. Ethical behaviour:

- 7.1.1. Peel expects the highest standards of business ethics from its supply chain in the supply of goods and services.
- 7.1.2. Peel expects its supply chain to be explicit about the standards they demand of executives, employees, partners and sub-contractors and to have governance and processes to monitor adherence to these standards.
- 7.1.3. Suppliers should support the spirit of the principles of the following international conventions, in accordance with national law and practice:
 - 7.1.3.1. United Nations Global Compact;
 - 7.1.3.2. United Nations Universal Declaration of Human Rights;

7.1.3.3. The European Convention of Human Rights;

7.1.3.4. 1998 International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

7.2. Fraud, Bribery and Corruption:

7.2.1. Peel expects its supply chain to adhere to anti-bribery and corruption laws, including but not limited to the Bribery Act 2010 and anti-money laundering regulations.

7.2.2. Peels expects the adherence to any applicable tax obligations, such as application of PAYE for workers supplied to Peel, and controls to prevent the criminal facilitation of tax evasion.

7.2.3. Peel expects its supply chain to have robust processes in place to ensure that the sub-contractors in their supply chain also comply with these laws.

7.2.4. Peel has zero tolerance of any form of corrupt practices including extortion and fraud and expect its supply chain to be vigilant and proactively look for fraud and the risk of fraud within their business.

7.2.5. Suppliers should immediately notify Peel where fraudulent practice is suspected or uncovered and disclose any interests that might impact their decision making or any advice that they give to Peel.

7.3. Transparency:

7.3.1. Peel seeks to be transparent in its dealings with its supply chain and expect suppliers to be open and honest in their dealings with Peel.

7.4. Treatment of Supply Chain:

7.4.1. Peel expects its supply chain to deal fairly with their sub-contractors and suppliers in their supply chain.

7.4.2. Peel expects suppliers to avoid passing down unreasonable levels of risk to sub-contractors who cannot reasonably be expected to manage or carry these risks.

7.4.3. Peel expects suppliers not to create barriers to the use of small and medium-sized enterprises who are qualified to

provide goods or services, and to encourage innovation in their supply chains to increase the value or quality of supply.

7.4.4. Peel expects its supply chain to be fair and reasonable in their payment practices. Suppliers should pay its sub-contractors within a reasonable time commensurate with its sub-contractors financial standing.

7.5. Corporate Governance and Corporate Social Responsibility:

7.5.1. Peel expects its supply chain to follow good corporate governance principles underpinned by robust processes.

7.5.2. Peel also expects its supply chain to uphold the values of this Supply Chain Code of Conduct and support Peel's key corporate social responsibility policy areas such as diversity and inclusion and sustainability.

8. Contact

8.1. For further information and enquiries, please contact email address: supplier@peel.co.uk

Appendix 1: Supply Chain Guide to Peel Policies

Peel expects that its supply chain will uphold as a minimum, the values that Peel has set out in its own policies as set out in this Appendix 1 Supply Chain Guide to Peel Policies.

Financial Policies

Whistleblowing Policy

Anti-Slavery and Human Trafficking Policy

Data Privacy Policy

Cyber Policy

Social Value Policy

Sustainability and ESG Policy

Energy and Carbon Policy

Sustainable Construction Policy

Sustainable Procurement Policy