

The **co-operative**

Central England Co-operative

Supplier Code of Conduct

As a co-operative business committed to creating a sustainable Society for all, Central England Co-operative (CEC) works hard to maintain ethical standards and we believe in putting our values into everyday practice in our relationships with customers, suppliers, members, colleagues and communities.

Our policies promote responsible and cost-effective use of natural and human resources and protecting the public's interest, which in turn support creating a sustainable Society for all.

CEC is committed to working with our Suppliers and their supply chains to uphold this duty of care and to operate in alignment with the standards set out in this Supplier Code of Conduct.

We are dedicated to:

- conducting our procurement activity with integrity,
- delivering value for money outcomes for the firm, in an ethical and sustainable way,
- appropriately manage a range of supplier-related risks,
- building relationships with preferred suppliers who understand our business,
- ensuring supplier diversity and effective supplier management approaches are employed,
- seeking out innovation and collaboration within our supplier base and
- ensuring timely communication and notification of any material changes to trading.

We are also focused on the environment and ensuring a positive contribution to our local and wider communities. This Supplier Code of Conduct sets out our expectations of suppliers, generally in terms of business practices, and specifically with regard to; the prevention of financial misconduct, data protection, information security and business continuity, ethical supply and people practices including diversity and inclusion, health and safety, and environmental responsibility.

General

CEC expects its Suppliers to behave ethically and to fully comply with all relevant laws whilst maintaining high standards of responsible business practice.

Prospective Suppliers shall keep all pre-contract data, negotiations and tender progress strictly confidential and may be required to enter into a more detailed non-disclosure agreement.

Prior to entering into any contract, CEC carries out due diligence on each Supplier to assess suitability of the Supplier to meet our business needs. Suppliers must cooperate fully and promptly.

All potential Suppliers may be subject to a Pre-Qualification questionnaire, during which time we reserve the right to carry out several checks including but not limited to: credit checks, safe contractor adherence, and references, to ensure they are fit for purpose.

All activity between CEC and potential Suppliers will be conducted with integrity. Contracts will be awarded based on merit. Hospitality or other inducements which seek to encourage or reward a decision must not be offered to our employees or any other individuals associated with CEC. The acceptance of gifts, hospitality or inducements of any nature during a competitive tender by our employees is strictly prohibited.

Where CEC enters into a contract with a Supplier, the relationship will be governed by agreed terms and conditions. In addition, the Supplier shall comply with the requirements of this Supplier Code of Conduct only to the extent that such requirements are not already expressly agreed in the contract between us and relevant to the Supplier and/or the services being provided, given all the circumstances.

Financial Misconduct

We take our responsibility with regards to Financial Misconduct seriously and ask our suppliers to do the same. This shall include bribery, corruption, money laundering, terrorist financing, tax evasion and the failure to prevent the criminal facilitation of tax evasion. Activities that this may apply to include verifying supplier entities, payment processes and funding arrangements, and any other aspects of the goods and service provision by the Supplier.

Suppliers shall comply with all relevant law relating to Financial Misconduct (including but not limited to the Bribery Act 2010) and shall not do or omit to do anything which would cause CEC to be in breach of such relevant law.

As part of the prevention, identification and detection of Financial Misconduct, Suppliers shall ensure adequate training, oversight and appropriate due diligence, record keeping and assessments take place and encourage prompt reporting if they know of or suspect any business activity that is in contravention of the Supplier's Financial Misconduct procedure.

Data Protection, Information Security and Business Continuity

Suppliers shall comply with all relevant data protection law and shall not knowingly do or omit to do anything which would cause CEC to be in breach. Each supplier must report without undue delay to their CEC contact any suspicion of a breach of any of their obligations under data protection law. This will include any breach by a sub-supplier engaged by the Supplier. We expect our Suppliers to ensure employees can anonymously report breaches of data protection law without fear of reprisal and all incidents should be investigated in a fair and timely manner.

Suppliers shall ensure:

- computer systems such as PC's and Laptops which are used to access the CEC / Zycus Source to Pay system are protected at a minimum with up-to-date Anti-Malware/Virus protection and a local firewall,
- username and password combinations ("Login") are not shared and that person is responsible for maintaining security of the login credentials and

Suppliers must also ensure they have reasonable and appropriate contingency plans in place to mitigate the risk of disruption of service to CEC and its operations, evidence of which may be requested by CEC from time to time and is to be provided to CEC upon request.

Protecting our people

Modern slavery

We are committed to ensuring there is transparency in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same commitment from all our Suppliers and their supply chains.

Suppliers and their supply chains shall respect the human rights of their employees, other personnel and local communities and shall comply with all relevant law pertaining to human rights.

Suppliers shall also take appropriate steps to identify and eradicate modern slavery, in all its forms, including slavery, servitude, forced and compulsory labour, and human trafficking, whether of adults or children, all forms of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Where required, Suppliers shall implement appropriate due diligence practices and provide training to identify the risk of and/or actual instances of modern slavery.

In line with legislation and where required (by law), Suppliers must document all the steps taken to tackle modern slavery and shall, on request, report to CEC setting out all policies and procedures implemented, including due diligence undertaken, risk areas identified, how risks have been mitigated, training provided and consequences for third parties of non-compliance.

Inclusion

CEC is committed to creating an inclusive business where individuals are able to be themselves, irrespective of their marital or parental status, gender, race, disability, religion, age and sexual orientation. As such, we expect our Suppliers to be able to demonstrate a commitment to diversity and inclusion within their own organisations and supply chain. Further, we expect Suppliers to agree to provide evidence of their commitment upon reasonable request.

CEC is committed to equal opportunity in employment in order to ensure that no job applicant, colleague or any other individual is discriminated against and less fairly treated because of gender, race, disability, religion, age, sexual orientation or any other characteristic justified in relevant law.

Suppliers shall ensure that employee wages, benefits provided and working time and the maximum hours of work comply with all relevant law.

Health and safety

CEC acknowledges and accepts our responsibilities for securing and maintaining high standards of health, safety and welfare for all who are directly employed or contracted to work on our Sites.

CEC requires that a safe and healthy workplace is provided for all Supplier personnel and that of the Health and Safety at Work Act 1974 and all other relevant law pertaining to health and safety is complied with at all times.

Protecting our environment

Suppliers shall comply with all relevant environmental law and shall operate their business and their supply chain in an environmentally responsible way. Suppliers shall have policies and procedures, including audits and reporting, appropriate to the size and nature of their operation which addresses preventing, mitigating and controlling serious environmental and health impacts from their operations.

Suppliers are asked to take a proactive approach to working with CEC towards reducing our environmental impact.

Changes to our Supplier Code of Conduct will be notified to all suppliers from time to time and all suppliers are expected to comply with new requirements that are relevant to their business, as soon as practicable. This Code of Conduct is not intended to supersede any specific legal requirements. If any conflict is identified, it should be raised with CEC's Procurement Department.