



# Supplier Code of Conduct

Version: 1.0 (Nov 2016)

**BritNed Development Limited**



## 1. Introduction

At BritNed Development Limited (“BritNed”), we are always seeking to improve our reputation as a sustainable and responsible company. To do this we must make sure that we keep to the law, our policies and licences, and we expect our business partners, suppliers and sub-contractors to do the same.

Our policy is to buy goods and services competitively, economically, fairly and efficiently, in line with all legal requirements.

This Supplier Code of Conduct (“Code”) sets out our basic requirements in a number of important areas. We value the business relationships we have with you. We believe that you are an important and central part of our success. This means that we expect you to carry out your business in line with this Code.

## 2. Business ethics standards

### 2.1 Fraud, bribery and corruption

We are committed to carrying out our business in a truthful, honest and open way, and we expect you to be honest and fair when you carry out your business. We have a zero tolerance approach to any type of bribery, fraud or corrupt business practices, and we expect you to have a similar approach.

We expect you to have a programme in place to prevent and detect fraud, bribery and corrupt business practices. In particular, we expect you to make sure you maintain control procedures in place to prevent bribery in accordance with the UK [Bribery Act 2010](#) and/or any other national laws or regulations.

If you find that bribery, corruption or fraud has taken place and this relates to work done on our behalf or which otherwise relates to BritNed’s business, you should contact our Legal team who deal with all areas concerning Business Conduct and Ethics. Our Legal team can be contacted as follows:

**Phone:** +31 26 202 01 30

**Fax:** +31 26 202 01 39

**E-mail:** [britned.info@britned.com](mailto:britned.info@britned.com)

We will regularly review your records on fraud, bribery and corruption, and if we have serious concerns (whether they relate to our business or not), we will review our relationship with you.

## 2.2 Gifts and hospitality

We recognise that in some companies, it may be customary to offer gifts and hospitality (e.g. meals and entertainment) as part of a long term business relationship. However, this should never be, or appear to be, with the intention of creating an improper influence. Our employees are issued with strict guidelines regarding their conduct in respect of gifts and hospitality and are required to record all gifts and hospitality whether offered, received or declined by them.

We encourage our employees not to take part in any activity that would affect their judgement when dealing with you. We also ask you not to offer our employees gifts or other valuable items. In particular, we do not allow our staff to accept cash or cash equivalents, such as gift certificates.

We may accept entertainment as long as it has a genuine business purpose, is appropriate and proportionate.

We do not allow our employees to see or take part in any:

- offensive or inappropriate entertainment;
- entertainment based on the value of anything we or another organisation has bought; or
- entertainment in return for influence or for a specific decision.

## 2.3 Being clear

You must:

- keep information on your business activities, structure, finance and performance, in line with appropriate laws, regulations and industry practices;
- be committed to being as clear and as fair as possible when you are dealing with your employees, suppliers and customers;
- have programmes which protect employees who give you information on any unfair or inappropriate business (whistleblowing), making sure that you do not reveal their identity; and
- have a complaint procedure for your employees which keep to local laws and regulations.

## 2.4 Intellectual property rights

We expect you to respect intellectual property rights (such as copyrights, patents) and protect customer information.

## 3. Health and Safety

### 3.1 Reducing risks to people's health and safety

Safety is important to the way our business performs. It is also important for defining the attitude and behaviour of BritNed and how we protect our employees.

We understand that there are risks involved in our work, and we believe that we can reduce these and prevent our employees being injured, as well as protect the public. We also believe that everyone has a part to play in achieving this.

We can only reduce risks and prevent injuries when there are no distractions. For us, success is more than just avoiding injuries and harm — it also includes improving people's well-being. We will encourage our employees to look after themselves and those around them.

You must be committed to creating an environment which is safe, healthy and secure for all of your employees, and you should identify any dangers and get rid of them. If you cannot get rid of something dangerous, you should put suitable controls in place.

Make sure you give your employees suitable equipment and protective clothing free of charge (if appropriate), and have safety procedures in place to protect them. We also encourage you to use internationally recognised safety -management systems and safe work systems.

You must not take disciplinary action against your employees for telling you about any safety concerns they have. Your employees shall have the right to refuse to work in any unsafe conditions until you have dealt with their concerns.

### 3.2 Communication

You must make sure that all of your employees know about this Code, and you must display it somewhere they can easily see it. You must provide all information in different languages (if needed). If you do not keep to this Code, we may end our relationship with you.

## 4. Protecting the environment

To help protect the environment, you should:

- show that you are doing your best to reduce the negative effect your work has on the environment;
- identify and manage any chemicals and other materials which would be dangerous if you released them into the environment, and make sure that you handle, move, store, recycle and get rid of these materials safely;
- monitor any waste water and solid waste you produce and make sure you treat it as the law dictates;
- make a reasonable effort to reduce all types of waste, including source reduction, recycling and reducing the amount of water and energy you use;
- use materials in a responsible way which does not affect the well-being of people, animals, and other living systems;
- use recognised methods to work out your carbon footprint (how much carbon dioxide you release into the environment) and how much waste you produce, and introduce procedures to reduce this;
- make an effort to focus on eco-design and think of the 'life cycle' of products, for example, think about using less packaging, using fewer natural resources, reducing the energy you use and using more recycled materials; and
- work towards an internationally recognised environmental and management systems, for example ISO14001.

## 5. Work and human rights

We expect you to keep to all laws relating to your business, as well as the principles of the [United Nations Global Compact](#), the [United Nations Declaration of Human Rights](#) and the [International Labour Organisation \(ILO\)](#).

### 5.1 Work

You must:

- not use workers who have been forced to work (either in exchange for their transport, food, clothes or home, or as part of a punishment) to supply goods, services and products. All of your employees must have volunteered to work and must be free to leave or end their employment by giving reasonable notice.
- not expect your employees to give you any government documents (e.g. passport) as a condition of their employment.
- make sure that your employees' contracts clearly explain the conditions of their employment. You must provide these contracts in another language (if needed).
- never employ anyone younger than 15 years old. However, you may offer apprenticeships or vocational programmes to children under 15, as long as they keep to Article 6 of the International Labour Organisation (ILO) [Minimum Age Convention Number 138](#). You may choose to employ young people aged between 16 and 18, as long as the work they do is not likely to put their health and safety at risk, and you keep to ILO [Minimum Age Convention Number 138](#).

## 5.2 Working hours

Your employees have the right to rest and leisure. Please make sure that you follow guidelines on good practice and local labour laws. If there aren't any labour laws, you should keep to the following:

- your employees cannot work for more than 60 hours a week, unless it is an emergency or unusual situation.
- you should give your employees at least one day off in every seven days. If an employee consistently works overtime, you should assess the situation at least every three months.
- if your employees work overtime, you should pay them a higher rate than their normal hourly rate, or you should give them extra paid days off work.

## 5.3 Wages and benefits

You must:

- pay all of your employees at least a living wage, and provide all the benefits that you have to do by law;
- not take money from their wages as a form of disciplinary action;
- provide vacation time, leave time and all holiday pay in line with the law; and
- pay wages on time and clearly give details about any deductions you have made.

## 5.4 Discrimination

You must:

- always treat everyone equally and not discriminate on the basis of race, religion, disability, age, sexual orientation or gender;
- keep medical information confidential;
- make sure that your employees are not harassed, bullied or treated unfairly;
- make sure that everyone in your workplace is included and that other employees treat them fairly and with respect;
- make sure that all employees have the chance to achieve their full potential; and
- respect your employees' legal right to form and join employee groups and trade unions. If the law says that your employees cannot join a group or trade union, you should set up something similar.

## 5.5 Modern slavery

Modern slavery takes many forms including slavery, servitude, forced or compulsory labour and human trafficking for exploitation. It is a crime and involves the deprivation of a person's liberty in order to exploit for personal or commercial gain.

We are committed to our obligations within the UK [Modern Slavery Act 2015](#) and will seek to ensure transparency in our approach to dealing with modern slavery within our business and supply chains. We expect you to apply the same high standards to your business and supply chains.

## 6. Management system

### 6.1 Managing risks

You should have processes in place to identify and manage risks in key areas, including:

- the environment;
- health and safety; and
- business standards.

Within health and safety, you must include the risks from:

- storing chemicals and material;
- your facilities;
- equipment; and
- laboratories and testing.

We expect you to have high standards; performance plans and targets, and to regularly assess these.

## 7. Monitoring and reporting

We expect you to evaluate your own activities to make sure you are keeping to this Code throughout your work.

You should have suitable training in place for managers and employees on introducing your policies, procedures and improvements, and a way of getting ongoing feedback on continuous improvement.

You must have a process in place to correct and put right any mistakes or problems you find through audits, reviews or inspections.

We also expect you to investigate and report any concerns you have about issues to do with breaking the law or standards which relate to our business. We can then investigate and deal with these issues.

We expect you to co-operate with us fully during any investigation we carry out, and we do not accept any type of retaliation against any person or business who raises any concerns.

## 8. Sub-contracting

Where you are allowed under the terms of your contract with BritNed to sub-contract work or services to third parties, we expect those third parties to be informed of the provisions of this Code and to adhere to its provisions.

## Document History

### Document Information

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### Document Amendment History

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