



Great Portland Estates plc

# Supplier Code of Conduct

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## Introduction

It is essential that our procurement and supply chain is managed responsibly and in a way that is aligned to the business values of Great Portland Estates plc, its subsidiaries and Joint Venture companies (the Company).

The Supplier Code of Conduct sets out the standards that we require of our suppliers to ensure that they are operating ethically and responsibly.

We appreciate that this code of conduct will apply to suppliers in different ways depending upon the nature of their business. Collaboration between our suppliers and the Company is essential to ensure that best practice in procurement is cascaded throughout our supply chain and we will work to develop that collaboration across all areas of our business.

## Protecting our environment

We require all suppliers to comply with environmental legislation as a minimum and to comply with any standards and codes that may be specific to their industry.

We also expect suppliers to:

- consider their impact on the environment during their operations and look to minimise their energy and resource consumption as an organisation and the Company's energy and resource consumption through careful consideration of design, selection of materials and construction techniques;
- review their own supply chains to ensure that their products and services are sourced from responsible suppliers;
- comply with the requirements of our Environmental Management System, including relevant KPIs;
- where relevant, report any known environmental non-compliances to us to enable us to take prompt action, this may include issues relating to nuisances such as noise, dust and odour; spillages fly-tipping, contaminated waste and uncontrolled emissions to air such as refrigerant leaks; and
- work to our Sustainable Development Brief, where applicable to their appointment and support us to achieve the goals of our Sustainability Strategy.

## Implementing high standards in health and safety

All suppliers must comply with relevant health and safety legislation and comply with standards and codes specific to their industry. We also require suppliers to adhere to our Health and Safety Policy Statement and maintain membership of at least one SSIP (Safety Schemes in Procurement), where appropriate to their work.

We also expect suppliers to:

- comply with the requirements of our health and safety management system, including relevant KPIs, whilst working at our properties or at our head office and work with us to achieve improved health and safety standards;
- ensure that employees have adequate health and safety information and training and where appropriate are in possession of a valid CSCS card;
- avoid using materials that may be harmful to health, either during their manufacture, use or disposal;
- ensure that they have adequate occupational health services to ensure the health and wellbeing of their employees, bearing in mind the nature and size of their business; and
- review the health and safety standards of their subcontractors before employing them to work at our properties or head office. Ensuring that the subcontractor has adequate competence and resources to do the work.

We encourage suppliers to implement and maintain their own health and safety management systems.

## Looking after people

The Company recognises the United Nations Universal Declaration of Human Rights and in particular, we expect suppliers to ensure the following requirements are observed:

- respect for their employees, ensuring that they can work safely, without risk of discrimination, harm, intimidation, harassment or fear;
- apply high standards in connection with equality and diversity and where appropriate to the size of their organisation have a policy in this regard;
- minimise the use of agency staff at our properties; and
- ensure prompt payment for their subcontractors.

## Preventing child labour

We expect our suppliers to comply with local laws regarding the minimum age of employees including:

- the minimum age for workers must not be less than the age of completion of compulsory schooling;
- compliance with all legal requirements for the work of authorised young workers; particularly those relating to hours of work, wages and safe working conditions; and
- the protection of young workers from performing any work that is likely to be hazardous or to interfere with their education or that may be harmful to their health, physical, mental, social, spiritual or moral development.

## Encouraging apprenticeships

We encourage our suppliers to participate in appropriate workplace apprenticeship programmes that comply with applicable laws and regulations.

## Avoiding forced labour

Suppliers must not use any type of involuntary or forced labour, including indentured, bonded, slave or human trafficked labour. We expect that:

- employees must be free to terminate their employment in accordance with established laws, regulations, and rules;
- suppliers will not retain workers government-issued identification, passports or work permits as a condition of employment;
- suppliers will permit reasonable access to consultants employed by the Company to undertake spot checks of its policies and procedures; and
- suppliers on request, will provide such documentation as reasonably requested by the Company to demonstrate its processes to prevent forced labour in its supply chain.

## Wage and benefits

Suppliers must pay workers at least the minimum required by local law and provide all legally mandated benefits. We expect that:

- in addition to payment for regular hours of work, workers must be paid for overtime hours at such premium rate as is legally required.

We encourage all our suppliers to ensure that they pay their employees the Living Wage or the London Living Wage for employees working in London.

## Working hours

We expect suppliers to monitor the working hours of their employees and ensure that they do not breach legal requirements and that the required rest days are provided.

## Freedom of association and collective bargaining

The Company recognises the importance of open communication and direct engagement between workers and management. We expect our suppliers to:

- respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal; and to
- recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing. Suppliers also must respect any legal right of workers to bargain collectively.

## Working in our community

We encourage our suppliers to:

- look to the local community to source services and labour where possible;
- support apprenticeship schemes and work with educational establishments to help address skills shortages;
- support local community causes; and
- develop positive relationships with our neighbours and tenants, in particular on our developments and refurbishments.

## Responsibility for ethical working practices

We expect our suppliers to:

- not enter into unfair practices to compete for our business and expects its suppliers will make purchasing decisions objectively based on price, delivery and other relevant practices;
- ensure appropriate policies are put in place to ensure the prevention, detection and reporting of bribery; and
- pay suppliers on a timely basis.