



Supplier Code of Conduct

October 2025

Introduction

GPE is committed to building and nurturing long term partnerships with our service partners, suppliers and contractors. By engaging with partners who share our values, and through increased collaboration and transparent communication, we believe we can work together to deliver exceptional results.

Ethical practices sit at the heart of our business activities supported by our core values, these are

- We achieve more together
- We are committed to excellence
- We are fair and inclusive
- We embrace opportunity
- We value every customer

For more information see our website www.gpe.co.uk

The overall objective of this Supplier Code of Conduct is to clearly set out our expectations of all our suppliers to support improved performance. This extends to anyone working on our behalf, either directly or indirectly. We recognise that the implementation of this Code of Conduct will be slightly different for each supplier.

We have systems and processes in place to monitor our supply chain for incidents of corruption, bribery or unfair, anti-competitive actions and where any such practices are identified decisive action will be taken. Please refer to our Ethics Policy, Whistleblowing Policy and Modern Slavery Statement for further guidance.

This document applies to our service partners, contractors and suppliers, as well as to GPE employees that are procuring those services.

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Protecting our environment

We are committed to working with our service partners, contractors and suppliers (referred to as supply chain partners throughout the rest of this document) who share our commitment to decarbonising business activities and creating climate resilient spaces. Our sustainability vision is outlined in ["The Time is Now"](#) our Statement of Intent.

In line with this, we expect supply chain partners to:

- consider the impact of their business on the environment and minimise energy and resource consumption.
- commit to tracking, if not already, their carbon emissions and set appropriate emission reduction targets toward achieving net zero carbon emissions by 2040
- work with us to improve awareness of the carbon impact of the goods and services procured by us to enable us to improve the accuracy of our scope 3 carbon emissions data to support the delivery of [Our Roadmap to Net Zero v2.0](#)
- work to our [Creating Sustainable Spaces Brief](#), where appropriate and relevant to the work being undertaken. For development work, a project sustainability plan will be provided for monitoring compliance with the Brief throughout the project

- apply the principles of the circular economy through careful design, selection of materials and construction techniques in a way that aligns with the circularity hierarchy: reuse, repair, remanufacture, recycle. More information on the circularity hierarchy can be found [here](#)
- consider the impact their business has on biodiversity and support the creation and preservation of biodiversity both at our properties and in our communities
- review their own supply chains to ensure that products and services are sourced from ethically responsible supply chain partners with appropriate controls in place
- have established sufficient measures to ensure compliance is maintained in relation to pollution laws and, in the event of environmental non-compliance, report to us, to enable prompt action to be taken. This may include issues relating to: nuisance, such as noise; dust and odour; spillages; fly-tipping; and uncontrolled emissions to air, such as refrigerant leaks
- comply with environmental legislation as a minimum standard, along with any best practice guidance and codes that may be specific to their industry

Positively impacting communities

We create a lasting positive social impact in London, working closely with our local communities, and expect supply chain partners to support this goal by:

- proactively looking to the local community to source services, goods, and labour where possible
- supporting our approach to developing the workforce of the future, GPE encourages our supply chain partners to support apprenticeship schemes and work with educational establishments to help address skills shortages
- supporting local community causes and charitable initiatives aligned with our social impact strategy
- establishing positive relationships with our neighbours and customers, in particular on our developments and refurbishments

- adopting inclusive employment practices, ensuring a diverse workforce and reporting, as far as appropriate, the organisation's split of protected characteristics at senior management levels
- work with us to review supply chains to improve transparency on the ethical sourcing of materials

We encourage supply chain partners to refer to the [Social Impact Strategy v2.0](#) and [Creating Sustainable Spaces Brief](#) for more information.

Implementing high standards in health and safety

Supply chain partners should commit to creating safe working conditions and a healthy environment for all their employees and subcontractors. This includes compliance with all relevant health and safety legislation, minimum standards and codes of best practice specific to their industry.

In particular, we expect supply chain partners to:

- have Health and Safety arrangements in place, including for the completion and maintenance of suitable and sufficient risk assessments, a written Health and Safety Policy (if they have five or more employees) and an effective health and safety management system
- ensure the competence of their subcontractors including the adequacy of their skills, experience, knowledge, training and resources, to carry out the proposed work
- promptly report, record and investigate all accidents, incidents, and near misses, implementing corrective actions to prevent recurrence
- comply with the requirements of our Health and Safety Management System and our contractor's site guidelines, as applicable, whilst working at our properties or at our head office and work with us to continually improve health and safety standards
- provide employees with appropriate workplace health and safety information and training, including written health and safety information and warnings, in their primary language
- avoid using materials that may be harmful to health either during their manufacture, use or disposal
- suitably and sufficiently risk assess tasks within their undertaking including managing exposure to physically demanding, repetitive or forceful tasks or environments
- 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
- demonstrate how they support the importance of both good mental health and the impact that the work environment can have on stress and anxiety
- ensure the safety of everyone in our buildings through consistent application of robust health and safety standards
- register under the Considerate Constructors Scheme for work at our development and refurbishment sites where appropriate
- maintain membership to at least one SSIP (Safety Schemes in Procurement), where this is appropriate for their line of work

Preventing forced labour

Upholding human rights and labour standards

The Group recognises the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organization and encourages its supply chain partners to do the same. In particular we expect that supply chain partners:

- protect their employees, ensuring that they can work safely, without risk of discrimination based on Protected Characteristics, harm, intimidation, harassment or fear
- respect and adhere to the United Nations' guiding principles on business and human rights, and engage with standards that promote the responsible sourcing of both labour and materials¹
- minimise the use of agency staff at our properties due to the higher risk of forced labour and unethical practices within these organisations
- conduct adequate levels of 'Right to Work' checks on all employees and subcontractors, retaining records of the checks that have been conducted

Prevention of forced labour

Supply chain partners 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 local laws and rules
- supply chain partners will not retain workers' government-issued identification, passports or work permits as a condition of employment
- supply chain partners will comply with the requirements of the Modern Slavery Act 2015, including training in relation to modern slavery, carrying out their own third-party assessments and providing the outputs to GPE on a frequency agreed between parties. Upon request, supply chain partners will also provide reasonable access to GPE, and consultants employed by GPE, to undertake spot checks of its policies and procedures to prevent forced labour in its supply chain
- slavery, forced labour and human trafficking will be a standing consideration in performance monitoring

Prevention of child labour

Supply chain partners must not use child labour, either directly or indirectly. We expect that:

- the minimum age for workers is not less than as defined by the International Labour Organization Minimum Age convention and in compliance with local laws
- legitimate work for young workers (e.g. workplace apprenticeships and internships) must comply with all local legal requirements, including those relating to hours of work, wages and safe working conditions
- young workers are protected from performing any work that is likely to be hazardous or interfere with their education or that may be harmful to their health, physical, mental, social, spiritual or moral development

¹E.g. ES 6001, the Framework Standard for Responsible Sourcing, and BES 6002, the BRE Ethical Labour Sourcing Standard

Respecting employees

Freedom of association and collective bargaining

Supply chain partners should recognise the importance of meaningful and open communication and direct engagement between workers and management. We expect supply chain partners 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
- facilitate and not hinder the legal rights of workers to freedom of association, including joining or not joining any association of their choosing, and to bargain collectively

Wages and working hours

Supply chain partners must pay workers at least the minimum wage required by local law and provide all legally mandated benefits. We expect supply chain partners to:

- pay workers for overtime hours at such premium rate as is legally required
- endeavour to pay their employees the current Living Wage and, for those providing employment in London, the London Living Wage
- monitor the working hours of their employees and ensure that they do not breach local legal requirements and are in-line with internationally recognised standards of 48 hours of work per week and that the required rest periods of at least 24 hours every seven days are provided
- ensure prompt payment to their employees and subcontractors, in line with the Prompt Payment Code
- minimise the quantity of zero-hour contracts held by employees and subcontractors

Anti-fraud, bribery and corruption

GPE prohibits any form of bribery, corruption, fraud or tax evasion, whether for personal gain or to benefit GPE. This applies to all individuals and organisations acting on our behalf. We expect supply chain partners to:

- have appropriate policies and procedures in place for the prevention, detection and reporting of bribery, fraud, money laundering and tax evasion in accordance with all applicable laws, including the UK Bribery Act 2010, the Criminal Finances Act 2017 and the Economic Crime and Corporate Transparency Act 2023
- ensure their employees, agents and subcontractors act with honesty and integrity and comply with GPE's Financial Crime Policy (available on our website). Any concerns about inappropriate business practices or unethical behaviour should be reported to us in a timely manner
- provide full transparency and assistance in any investigation, audit, or inquiry arising from a reported concern

Failure to comply with these requirements may result in termination of our business relationship and, where appropriate, referral to relevant authorities

Harassment and bullying (including sexual harassment)

Supply chain partners must recognise that harassment and bullying by or against any of our customers, supply chain partners or external stakeholders will not be tolerated. We expect supply chain partners to:

- inform GPE of any incidents or concerns of harassment and bullying that have occurred on our sites. Our [Whistleblowing Procedure](#) can be used if necessary
- treat incidents with the utmost importance, taking proportionate action where needed
- support individuals raising such complaints of harassment in a sensitive and fair way

Upholding robust digital infrastructure

Data Protection & Privacy

Supply chain partners must comply with all applicable data protection and privacy laws, including but not limited to, the Data Protection Act 2013 (which incorporates the General Data Protection Regulations) and local regulations. We expect supply chain partners to:

- ensure all personal and sensitive data is processed lawfully, stored securely and used only for authorised purposes
- implement appropriate technical and organisational measures to protect data and promptly notify us of any unauthorised disclosure of personal data which you are processing on our behalf and to fully cooperate with any remediation efforts and subsequent investigation

Cybersecurity & Information Security

Supply chain partners must maintain robust cybersecurity controls appropriate to the nature and scale of services provided. We expect supply chain partners to:

- implement industry-standard security frameworks, conduct regular security assessments and maintain secure network infrastructure
- protect all confidential information against unauthorised access, disclosure or misuse

Technology Standards & Compliance

Supply chain partners must ensure their technology practices comply with all applicable laws and regulations. We also expect supply chain partners to:

- ensure all software is properly licensed and technology solutions meet agreed accessibility and interoperability requirements
- adhere to relevant industry standards and maintain appropriate certifications (such as Cyber Essentials, ISO 27001, SOC 2 etc.) where applicable

Business Continuity & System Reliability

Supply chain partners must maintain appropriate business continuity and disaster recovery plans to ensure service continuity. To support this, we expect supply chain partners to:

- ensure systems meet agreed availability and performance standards, with robust backup and recovery procedures in place
- promptly communicate any significant system outages or service disruptions with clear recovery timelines

Governance

We will periodically monitor supply chain partners' adherence to this Code of Conduct and report our findings where it is appropriate to do so.

In the case of a breach or potential breach of relevant legislation (e.g. suspected human trafficking, H&S, environmental breach, tax evasion, bribery, fraud) GPE should be notified as soon as the supply chain partner becomes aware

Wherever possible, we encourage our supply chain partners to raise any concern with their usual GPE contact. Alternatively, we have a formal whistleblowing policy which can be found on our website

We will review this Code of Conduct on a periodic basis to ensure that it remains effective. Any updates made will be communicated to all existing supply chain partners

Our supply chain partners may be required to report on a series of Key Performance Indicators pertaining to the magnitude of our contract with them. These KPIs will be agreed upon appointment and may include any of the following focus areas:

- sustainability
- health and safety
- contract management
- customer experience / operations

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