

## **GAS Supplier Code of Conduct Policy**

We expect all suppliers to follow our code of conduct as set out below. Any suppliers found to be not complying with this code of conduct will be reviewed and if compliance cannot be achieved within a reasonable time frame, may need to be phased out.

This supplier code of conduct is based on the UK government's supplier code of conduct.

### **Employees and Service Users**

#### **Respectful treatment**

Our employees, those of our suppliers, and service users have the right to respectful treatment. We will not tolerate discrimination, harassment or victimisation in the workplace or in connection with any service. We expect our suppliers to provide the same commitment, including to their own employees. The Equality Act 2010 protects against discrimination, harassment and victimisation.

#### **Meeting user needs**

It is important that contracts with our suppliers meet the needs of service users. We will work together with suppliers to articulate these outcomes to ensure that the goods and services being provided meet the needs of users and we expect fully reciprocal behaviour from suppliers.

#### **Human rights and employment law**

Suppliers must comply with all applicable human rights and employment laws in the jurisdictions in which they work. This includes complying with the provisions of the Modern Slavery Act 2015. In addition, suppliers must have robust means of ensuring that the subcontractors in their supply chain also comply.

### **Business practices**

#### **Continuous improvement**

We expect our suppliers to use recognised industry practices in the delivery of goods and services to us. We also expect suppliers to continuously improve these services. We will endeavour to create the right conditions to allow suppliers to be creative and continuously improve.

## End-to-end Delivery

Some of the services that we require 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, we will endeavour to create and maintain a culture that facilitates collaboration between all suppliers. We expect suppliers to operate in the spirit of open collaboration for the best outcomes of the contract for all parties involved.

## Reputation and Public Trust

We want to work with suppliers who are proud of their reputation for fair dealing and quality delivery. We want working with us to be seen as reputation enhancing for the supplier. We expect all parties to be mindful of the need to maintain public trust and protective of our reputation, and ensure that neither they, nor any of their partners or subcontractors, bring us into disrepute by engaging in any act or omission which is reasonably likely to diminish the trust that our stakeholders have in us. This is not intended to limit any supplier's legal obligations, or constrain whistleblowing or their ability to fairly criticise us.

## Cyber Security

It is essential that suppliers safeguard the integrity and security of their systems and comply with the relevant standards and guidance. Suppliers must inform us and the ICO if they become aware of any cyber security incident that affects or has the potential to affect our data or the personal data of our stakeholders.

## Sustainable Procurement

We expect our suppliers to be aware of, and support us in complying with our own procurement policy and demonstrating best practice in sustainability within their relevant industries. We expect suppliers to be open and transparent in assisting us in reporting publicly on product or service utilisation and any environmental impacts.

## Confidentiality

Suppliers are expected to comply with the provisions in our contracts and any legal requirements to protect commercial and sensitive information. Suppliers may 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. Notwithstanding this mutual understanding, suppliers should recognise that this does not prevent us from disclosing information where we are compelled to do so, for example, by law.

## Conflicts of Interest

We expect suppliers to mitigate appropriately against any real or perceived conflict of interest through their work with us. A supplier 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.

## Standards of Behaviour

### Ethical behaviour

We expect the highest standards of business ethics from suppliers.

### Counter Fraud and Corruption

We demand that suppliers adhere to anti-corruption laws, including but not limited to the Bribery Act 2010, and anti-money laundering regulations. We expect suppliers to have robust processes to ensure that the subcontractors in their supply chain also comply with these laws. We have zero tolerance of any form of corrupt practices including extortion and fraud that we become aware of and we expect suppliers to be vigilant and proactively look for fraud, and the risk of fraud, in their business.

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

### Transparency

We seek to be transparent in our dealings with suppliers and we expect suppliers to be open and honest in their dealings with us.

### Treatment of Supply Chain

We expect suppliers to deal fairly with the subcontractors and suppliers in their supply chain. We expect suppliers to avoid passing down unreasonable levels of risk to subcontractors who cannot reasonably be expected to manage or carry these risks. We expect 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.

## Prompt Payment

We expect suppliers to be fair and reasonable in their payment practices. Suppliers should pay subcontractors within 30 days on our contracts.

## Corporate Governance and Corporate Social Responsibility

We expect our suppliers to be good corporate citizens by taking into consideration social value in delivering goods and services and supporting key corporate social responsibility areas such as diversity and inclusion, sustainability, prompt payment, small and medium sized enterprise engagement and addressing the gender pay gap.