

## SUPPLY CHAIN CODE OF CONDUCT

**Trust is committed to carrying out our business in a responsible and fair manner, which provides our customers with the very best value for money.**

**This Supply Chain Code of Conduct has been produced to set out Trust's environmental, social and governance standards we expect all our suppliers, their employees and any sub-contractors engaged to deliver activity for Trust, to commit to.**

**The Code of Conduct forms part of any contract entered into with Trust and compliance with it is legally binding on each supplier. Suppliers are expected to carry out sufficient due diligence of their own supply chain to minimise risks and impacts to Trust.**

More information in relation to Trust's approach to procurement, including compliance with Scottish Public Procurement legislation, can be found on our website - [Procurement | Trust Housing Association \(trustha.org.uk\)](https://www.trustha.org.uk/procurement)

### **Legal and regulatory standards**

Trust requires all of its suppliers to comply with all applicable laws, regulations and standards.

### **Customers**

The experience of our customers is at the heart of how Trust operates. We expect our suppliers to use customer insight to improve quality and drive innovation. Where services are customer facing they must be accessible, seamless and easy to deal with, using the appropriate tone of voice to ensure customers feel listened to and that their feedback is important.

### **Health, safety and wellbeing**

All of Trust's suppliers and contractors must comply with health and safety legislation relevant to the extent of the works or goods supplied. We expect suppliers and contractors to provide all their employees and others under their control with appropriate training, instruction, information, personal protective equipment, and a safe and hygienic working environment. Any contractor working on behalf of Trust must also meet all specific requirements detailed in their contract.

Policies and processes must be in place for recording and eliminating occurrence/reoccurrence of health and safety related incidents and should have regard for avoiding the cause of any mental health issues affecting workers.

### **Resident safety**

We take our responsibilities to ensure the safety of our residents and colleagues seriously. In all cases when suppliers and contractors are carrying out works that may impact on resident of

colleague safety, they will be expected to communicate with local employee teams, put measures in place to enhance safety and safeguarding, and be considerate of customers' needs.

### **Fire safety**

Trust is committed to making sure that its supply chain positively impacts on standards of fire safety in its premises. All of Trust's suppliers and contractors must comply with applicable legislation in relation to premises and product fire safety standards and provide evidence of compliance on request. Any contractor working on behalf of Trust must also meet specific fire safety requirements detailed in their contract.

### **Fair Work First, Compensation and working hours**

As a Fair Work First employer, we encourage our supply chain to adopt the principles of the Scottish Government's Fair Work First, including payment of at least the Real Living Wage where it is relevant and proportionate to do so.

More information can be found on our website - [Fair Work First | Trust Housing Association \(trustha.org.uk\)](https://trustha.org.uk)

We expect you to be working towards eliminating any gender pay gap, support equal pay for work of equal value and comply with national laws and regulations regarding working hours, minimum wages (or living wage) and benefits.

### **Modern Slavery Act 2015**

You will comply with the obligations set out in this Act. All suppliers are expected to commit to having a slavery-free supply chain, with all endeavours being made to ensure this.

### **3<sup>rd</sup> Party Harassment – The Worker Protection (Amendment of Equality Act 2010) Act 2023**

Trust takes a zero-tolerance approach to all forms of harassment including Sexual Harassment. A single incident can amount to sexual harassment.

Third-party harassment occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, unwelcome sexual advances from a supplier visiting our premises.

You will comply with the obligations set out in the Act and commit to taking all reasonable steps to prevent any Third-party harassment. Where a complaint is received you commit to fully cooperating in any investigation process.

### **Equality, diversity and inclusion**

Trust is committed to helping to create a more equal society which respects diversity and embeds inclusion. Our goal is to be a diverse, inclusive organisation where our people thrive and respond to the needs of our customers with fairness and empathy. We want to work with organisations who have the same passion as we do and who are willing to share their successes and learning:

As a provider of a range of diverse services, we ask that you do not make assumptions about what people want, but actively seek to understand and respond to their individual needs. We expect that

you and your employees will value and respect the identities and cultures of our employees, customers and communities, using this diversity to improve your culture and performance.

We expect your organisation to have a strong anti-discriminatory attitude that is promoted throughout your workforce. You must have clear disciplinary processes should there be an issue in regard to discrimination, harassment, victimisation or bullying and be monitoring their effectiveness.

Trust is accredited as a Platinum Investor in People, as well as a disability confident employer, and we want to work with organisations who share the same passion as we do and who are willing to share their successes and learnings.

More information can be found on our website - [Equality, diversity & inclusion | Trust Housing Association \(trustha.org.uk\)](https://www.trustha.org.uk/equality-diversity-inclusion)

### **Communication**

We expect honest and transparent communications allowing for people's needs, language and literacy.

### **Community benefits**

Trust is committed to maximising community benefits for our customers and communities through our procurement activities. This will be achieved through the inclusion of specific community benefits requirements within contracts. These could include provision of jobs and training places for particular groups; or donations of goods, equipment, or expertise to support local community activities.

Trust encourages all suppliers to work with us to deliver community benefits, with a specific focus for suppliers to demonstrate community benefits on contracts over £500k. Additional Scottish Government legislation applies in respect of community benefits for contracts over £4m.

### **Net Zero**

Trust is committed to transition to net zero by 2045 at the very latest. We are investing in a net zero future and embedding a climate mindset across the organisation, we expect the same from our suppliers, to collectively play our part in addressing the climate emergency.

As a minimum we expect suppliers to comply with all environmental laws and regulations. We expect our suppliers to support us on this journey, by proactively engaging with us to reduce any damage caused by either party's operations wherever possible. In particular, we would want our suppliers to measure and monitor the environmental impact of the goods and services supplied to Trust, including downstream supply chain, and would expect collaborative action to reduce negative environmental impacts. We encourage supplier innovation to develop more environmentally friendly products and service solutions.

More information can be found on our website - [Net Zero | Trust Housing Association \(trustha.org.uk\)](https://www.trustha.org.uk/net-zero)

### **Honesty and integrity**

We expect our suppliers to operate with honesty, integrity and transparency in all business

activities, complying with relevant legislation such as the Bribery Act 2010 and Money Laundering Regulations 2017. Suppliers may not offer services, gifts or benefits to Trust employees or their families.

### **Cyber security**

We expect all our suppliers to observe appropriate levels of cyber security as set out in Cyber Essentials. Where processing any sensitive or personnel information, suppliers must have a minimum accreditation of Cyber Essentials or higher to make sure that their own systems and supply chains are as secure as possible.

### **Business continuity planning**

As our supply chain is integral to the service, we provide it is essential that our suppliers have robust business continuity plans in place to protect their operations as far as possible, should any disruption to their business occur (for example natural disasters, terrorism, software viruses, illness and infectious diseases).

### **Data Protection Act 2018**

Trust expects its supply chain to protect all data that we provide to them in the course of business, to an appropriate standard so as not to cause Trust to become non-compliant with the Data Protection Act 2018 through a deliberate act, negligence or ignorance. Personal, sensitive or confidential information must not be disclosed to a third party (either by accident or deliberately) without our prior agreement and must be handled according to current, relevant legislation.

### **Open and fair competition**

Trust complies with competition legislation. We believe in open and fair competition and expect our suppliers to do the same. Suppliers must not engage in anti-competitive practices including price fixing, bid rigging or blacklisting.

### **Whistleblowing**

Trust respects the right of our employees, residents, contractors and other stakeholders to raise concerns about possible wrongdoing within the organisation. We encourage individuals to raise concerns through responsible whistleblowing to either your local contact or Trust's People Team. We will act to investigate the concerns without discriminating against the whistle-blower.

### **Prompt payment**

Trust strives to pay all invoices within agreed supplier payment terms, subject to acceptance of a correct and valid invoice. We expect our suppliers to do the same.

**Supplier Acknowledgement & Commitment**

**I, the undersigned, acting as a representative of the Company, hereby confirm that the Company adheres to the Trust Housing Association Supply Chain Code of Conduct, and shall ensure its supply chain adheres to the principles of the code of conduct to enforce, promote positive social, ethical, environmental, and economic supply chain practices.**

Signed	
Print name	
Position	
Company name	
Company address	
Registered company number	
Date	