

# Supplier Code of Conduct

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**Our Purpose & Strategy.**

**Our Purpose** is *'Bringing together ideas, energy and resources to make life better in our communities'*.

This purpose is delivered through 4 strategic pillars, supported on a solid foundation of being a member owned Co-operative.

We welcome suppliers to work with us and support delivering our purpose through open transparent ways of working.

# Supplier Code of Conduct

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*‘Thank you for playing your part in delivering our Purpose.’*

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## Forewords.

### Why a Supplier Code of Conduct?

This *Supplier Code of Conduct* highlights the values and principles that are important to Lincolnshire Co-op, and which we expect our suppliers to embrace.

We are a Purpose led business and aspire to set an example of the best standard. We encourage you to reflect on your practices considering our Purpose and the principles set out in this code. We are always open to dialogue to support you in integrating these in your own business practices where needed.

**Alison Hands – Chief Executive Officer**

### What does it mean in practice?

We expect all our suppliers to adhere to the key principles presented on page 4 of this *Supplier Code of Conduct*. We will always ensure our expectations and the requirements we set are relevant and proportionate to the size of your organisation and the service you provide.

We value and depend on our suppliers as an extension of our capability and are committed to developing our supplier relationships and building trust by:

- Being open, non-discriminate and proportionate in all our dealings with you, including the resolution of any disputes.
- Respecting and honouring the contractual commitments we have made to you.
- Ensuring payments for goods and services delivered are in line with agreed payment terms.
- Providing useful feedback and guidance to help nurture a working environment based upon mutual benefit and a shared commitment to continuous improvement.

We look forward to working with you.

**Andrew Turner – Procurement & Sustainability Manager**

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## Key principles - Applicable to all suppliers

As a supplier to Lincolnshire Co-op, we expect you to adhere to the following principles:

- Comply with all applicable laws and standards.
- Adopt fair and ethical employment practices.
- Take proportionate steps to reduce the risks of child labour or modern slavery in your supply chain.
- Provide as a minimum to all your employees working regularly on company premises the national minimum wage or other legal minimum standard.
- Take active steps to disclose and manage any actual, potential, or perceived conflicts of interest in relation to your engagement with Lincolnshire Co-op.
- Refrain from offering gifts or hospitality to our colleagues and only ever in line with our policies.
- Promote equal opportunities for all and embrace diversity in the workplace.
- Take steps to reduce the environmental impacts of your products or services.
- Take opportunities to make a positive impact in your local community.
- Take a proactive approach to the wellbeing of your workforce.
- Provide a safe working environment for your employees and those affected by your activities.
- Have proportionate business continuity capabilities in place.
- Comply with privacy and data protection laws to ensure individuals covered by our engagement with you are subject to the appropriate protections.
- Comply with our information, physical, personnel and cyber security requirements and standards appropriate to your engagement with us.
- Notify Lincolnshire Co-op immediately if you become aware or suspect any security incident that may affect our data or assets.
- Notify Lincolnshire Co-op immediately of any material business change that may adversely affect continued supply of goods and/or services to us.

## Requirements & controls

We expect all our suppliers to adhere to the key principles presented on page 4. Reflecting the diversity of our suppliers, we fully expect different approaches to the way these principles are implemented in practice.

It is important for Lincolnshire Co-op to be able to control risks and gain assurance on the performance and resilience of its supply chain. Thus, dependant on the nature and value of the products or services you supply to us, we may request specific requirements and controls as evidence of how you implement the key principles.

### When will requirements be set?

We are committed to be clear and transparent about our expectations. The following pages provide examples of the requirements and controls we may request. We aim to set requirements as clearly and as early as possible. This would be at tendering stage for new contracts, or during contract renewal for existing contracts. If risks or new applicable legislation are identified, we will open a dialogue with you to agree a practical and realistic approach to address.

We will monitor the implementation and adherence to the key principles and any agreed additional requirements as part of our contract management processes.

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## Human and labour rights

<b>Our Objective</b>	To deliver our Purpose responsibly and sustainably, in a manner that respects and promotes fair and lawful working conditions.
<b>Why is it important to us?</b>	Our organisation has a zero tolerance approach to improper working practices and modern slavery. Slavery can include any form of servitude, forced and compulsory labour and deprivation of liberty for personal or commercial gain. We work with our business partners to ensure a strong approach is taken to tackling these practices.

### What we expect from our suppliers:

**To adopt fair and ethical employment practices.**

**To take proportionate steps to reduce the risks of child labour or modern slavery in your supply chain.**

**Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.**

Examples of additional requirements may include providing:

- Evidence of arrangements in place which demonstrate compliance with applicable legislation.
- Evidence of the proportionate steps taken to reduce the risks of child labour or modern slavery in your supply chain.



## Business ethics & conflicts



<b>Our Objective</b>	To ensure that we act with integrity and demonstrate impartiality in our business engagements with others and in our decision-making.
<b>Why is it important to us?</b>	Integrity, selflessness, objectivity, and impartiality are a core part of our organisation's values.

### What we expect from our suppliers:

**Take active steps to disclose and manage any actual, potential, or perceived conflicts of interest in relation to your engagement with us.**

**Refrain from offering gifts or hospitality to our colleagues and only ever in line with our policies.**

Examples of additional requirements may include providing:

- A policy, or equivalent, which covers the disclosure and management of conflicts of interest.
- A policy, or equivalent, which covers the requirements of the Bribery Act 2010.



## Environment

<b>Our objective</b>	To improve the environmental sustainability of our operations and reduce our carbon emissions.
<b>Why is it important to us?</b>	Our commitment to be accountable for our actions and their consequences includes our responsibility to look after our local environment. This is also consistent with our sustainability work to enhance our operational resilience to climate change.

### What we expect from our suppliers:

#### To take steps to reduce the environmental impacts of your products or services.

Examples of additional requirements may include providing:

- A policy, or equivalent, which describes your adopted approach to reducing your key environmental impacts and complying with environmental legislation.
- Relevant evidence of the actions you have taken to minimise the environmental impacts your products and services - e.g. carbon reduction plan/policy, carbon certification, carbon footprint, environmental standards.
- Relevant environmental information about your products or services, and associated use of resources.



## Diversity and Inclusion



<b>Our objective</b>	To reflect the society we serve, make better decisions, avoid unconscious bias, and promote diversity and inclusion.
<b>Why is it important to us?</b>	To pursue our Purpose, we must reflect the diversity of the communities we serve. This is because it is the right thing to do; it helps to build trust; and it is well established that diversity leads to more creative thinking and inclusion reduces the risks of groupthink and bias leading to more balanced and robust decision making.

### What we expect from our suppliers:

#### To promote equal opportunities for all, and embrace diversity and inclusion throughout the workplace

Examples of additional requirements may include providing:

- A policy, or equivalent, which explicitly prohibits bullying, harassment & discrimination including on the grounds of the protected characteristics stated in the Equality Act 2010.
- Evidence of active steps being taken to encourage inclusion and equity of opportunity in the workplace and embed the requirements of the Equality Act 2010 (or equivalent local legislation if providing services from outside the UK). Such as providing Diversity and Inclusion training for employees, signing the Age Friendly Employer pledge or becoming a Disability Confident employer
- Evidence of how your services or goods are inclusive and accessible to all intended users, including individuals with disabilities.





## Community

<b>Our objective</b>	To help grow the local economy through positive impact and influence across communities.
<b>Why is it important to us?</b>	We want to use our influence and experience to create a positive impact in society, inspiring individuals to get involved with their community and charitable causes.

### What we expect from our suppliers:

#### To take opportunities to make a positive impact in your and our local communities

Examples of additional requirements may include providing evidence of:

- Support provided to charitable or philanthropic causes (such as fundraising, donations in kind, pro-bono work, etc.).
- Initiatives to offer opportunities for young people and encourage social mobility (such as work placements, apprenticeships, support to integrate students from disadvantaged backgrounds).
- Support in place for your employees to fundraise or volunteer (such as match-funding or volunteering leave).



## Wellbeing

<b>Our objective</b>	To support colleagues' mental and physical health, to enable them to bring their best selves to work.
<b>Why is it important to us?</b>	As a responsible employer, our proactive approach to wellbeing plays a key part in building an inclusive culture at Lincolnshire Co-op. Organisations taking this approach can also benefit from improved employee retention and productivity.

### What we expect from our suppliers:

#### To take a proactive approach to the wellbeing of your colleagues

Examples of additional requirements may include providing evidence of:

- Policies and initiatives to support wellbeing, including a healthy work and family balance.
- Implementation of the mental health core standards.
- Provision of an Employee Assistance Programme.
- Provision of employee benefits designed to enhance wellbeing.



## Health & safety

<b>Our objective</b>	To achieve high standards in health, safety and welfare for all our colleagues, customers, contractors and visitors.
<b>Why is it important to us?</b>	We believe that every employer should provide a safe working environment for its colleagues, and ensure that the health and wellbeing of its colleagues and customers is at the heart of its business objectives .

### What we expect from our suppliers:

**To provide a safe working environment for their colleagues and those affected by their activities**

Examples of additional requirements may include providing:

- A policy, or equivalent statement, which outlines your approach to Health and Safety.
- Evidence of arrangements in place to actively meet your duties and comply with relevant Health & Safety legislation.
- Evidence of arrangements in place that are effective in reducing and preventing incidents, accidents, or occupational ill health.



## Business continuity

<b>Our objective</b>	To embed a robust and flexible capability to respond quickly to, manage, and recover safely from, disruptive events
<b>Why is it important to us?</b>	Lincolnshire Co-op, like many other organisations, is exposed to potential risks that could cause disruption. Our strategy is to prioritise the safety and security of our colleagues, members, customers and visitors; and to continue business critical functions, focusing on the things that matter.

### What we expect from our suppliers:

**To have proportionate business continuity capabilities in place, based on how critical your service is to Lincolnshire Co-op.**

Examples of additional requirements may include providing:

- A policy which describes how you will recover following a disruptive event.
- A strategy that enables you to achieve the recovery time objective (RTO) and recovery point objective (RPO) set.
- A fit-for-purpose Business Continuity Plan that has been reviewed / exercised at an appropriate frequency.
- A Post-Exercise Report.
- Evidence of any ongoing business continuity testing and exercising programme.



## Privacy and data protection

<b>Our objective</b>	To value, protect and use information relating to individuals in a way that respects individuals' rights.
<b>Why is it important to us?</b>	We aim to conduct our business using information relating to individuals fairly, lawfully, securely, and in a manner that minimises the risk to individuals and Lincolnshire Co-op.

**What we expect from our suppliers:**

**To comply with privacy and data protection laws, and contract terms.**

**To protect individuals and Lincolnshire Co-op from risk**

Examples of additional requirements may include providing:

- A policy, or equivalent, which expresses your commitment to managing data protection appropriately.
- The name of an individual responsible for data protection within the business.
- An overview of data protection training and other confidentiality obligations for staff.
- Risk management procedures relating to data protection compliance.
- A record of processing activities, as it relates to our data.
- Information security arrangements.



## Security

<b>Our objective</b>	To protect the information and assets we are entrusted with in support of 'Our Purpose'. This includes our people, property, confidential data and systems.
<b>Why is it important to us?</b>	To ensure our confidential information remains confidential and Lincolnshire Co-op's assets, colleague and member information remains secure.

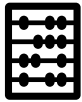
**What we expect from our suppliers:**

**To comply with our information, physical, personnel and cyber security requirements and standards**

**To notify us immediately on becoming aware of any security incident that may affect our data or assets.**

Examples of additional requirements may include providing evidence of:

- Compliance to security best practice frameworks (e.g. ISO 27001).
- Controls that meet our minimum information security standards and additional controls where contractually agreed.
- Policies and procedures to protect sensitive information.
- Appropriate security controls for sub-contractors and supply chains.
- Secure networks, IT operations, development and change activities for technology assets.
- Procedures for the timely identification and management of incidents.



## Financial Dealings and Practices

<b>Our objective</b>	We have a responsibility to keep accurate accounting records and to be alert to financial crime.
<b>Why is it important to us?</b>	It is important we do not let criminals misuse our business or its goods and services in breach of applicable laws. There are severe financial penalties for companies and individuals who are involved in money laundering and other financial crimes

What we expect from our suppliers:

**Share our zero tolerance approach to anyone who may try to use our business to move funds raised from criminal activity.**

**Keep accurate accounting records that meet relevant accounting standards.**

Examples of additional requirements may include:

- Ensuring training and awareness of financial crime is briefed to appropriate personnel.
- Demonstrating that appropriate reporting procedures are in place for staff and other stakeholders to report suspected criminal activity.
- Ensure that appropriate due diligence and record keeping practices are in place to manage your own supply chains, and particularly those relevant to the provision of goods and/or services to us under our arrangements with you.



## Fair Competition

<b>Our objective</b>	We are committed to complying with competition laws in all the markets in which we operate.
<b>Why is it important to us?</b>	We believe that healthy competition is integral to the proper functioning of markets. Competition ultimately delivers better choice and value to end-customers

What we expect from our suppliers:

**Share our commitment to never abusing market position or exploiting customers by the way prices are set, or goods and services are provided.**

**Do not share or facilitate the sharing of any information with our competitors that may give rise to an infringement of applicable competition laws.**

Examples of additional requirements may include:

- Demonstrating that an appropriate policy and training is in place to ensure compliance with competition laws.
- Demonstrating appropriate information sharing controls are in place where a particular supply arrangement may also involve partnering with an organisation that could be considered a competitor of Lincolnshire Co-op.



## Speaking Up and Reporting

In order to maintain our integrity and reputation, it is important we all commit to speaking up straight away if we see something that isn't right. This is often referred to as 'whistleblowing'.

By speaking up you are not just protecting Lincolnshire Co-op, you are also protecting its colleagues, members, customers and other stakeholders; doing what's right to stop wrongdoing or even criminal activity. You don't need to have all the facts; if something may breach a requirement of this Code of Conduct, or simply does not look or feel right then that is enough. Don't worry about being 'mistaken'; we support anyone who raises genuine concerns. There are several ways to 'speak up'. Choose the contact method that you are most comfortable with. Reports are treated with strict confidentiality and, on request, anonymously. It is important to us that people can raise issues without worrying about it affecting them. We rely on our suppliers to help ensure that our organisation and colleagues achieve ethical business conduct, respect the law, and that Lincolnshire Co-op remains a trusted partner.

Any concerns relating to this Code of Conduct can be raised with our Procurement & Sustainability Manager directly. Alternatively, Lincolnshire Co-op has set up an external and totally independent facility managed by Safecall. Their specially trained call handlers can be contacted on: 0800 915 1571. Safecall also maintain a secure web-based reporting facility, which can be accessed using the following link: [www.safecall.co.uk/clients/lincolnshire-coop](http://www.safecall.co.uk/clients/lincolnshire-coop)

If you wish to report a sensitive concern in writing, you can also send any correspondence marked for the attention of the Group Secretary & General Counsel at the address listed below:

The Group Secretary & General Counsel  
Lincolnshire Co-operative  
Stanley Bett House  
15-23 Tentercroft Street  
Lincoln  
LN5 7DB



*Our purpose*

Bringing together ideas, energy and resources to make life better in our communities

**Together we are...**

-  providing and supporting valued services
-  helping to grow the local economy
-  caring for our health and wellbeing
-  looking after our local environment

*Our approach*

- keeping it local
- developing people
- working in our communities
- growing a community of members
- building strength for the long term
- helpful
- inspiring
- trustworthy

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For queries, please contact [procurement@lincolnshire.coop](mailto:procurement@lincolnshire.coop)

Stanley Bett House,  
15-23 Tentercroft Street,  
Lincoln,  
Lincolnshire  
LN5 7DB

This provisions of this Code are to be regarded as part of your contractual agreement with Lincolnshire Co-operative Ltd. Where any provisions of this Code conflict with the terms and conditions of your contract with us, those terms and conditions will take precedence.