

TRUSTMARQUE SUPPLIER CHARTER

March 2022



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Introduction – a message from our CEO

"We strive to work with suppliers who share our commitment to comply with applicable laws and regulations, behave ethically, sustainably and with integrity.

Our aim is to work together to achieve the highest standards in our supply chain, whilst achieving wider social, economic, and environmental benefits aligned to the Social Value Act.

Our partners are essential contributors to our success and our Supplier Charter outlines the standards that we hold ourselves to and our expectations of our supply chain.

We understand that, depending on the nature and scale of supply, different aspects of our Charter will be more relevant to some suppliers than others. This enables us to agree suitable targets with suppliers that are appropriate to their product or service offer.

As a minimum, we expect ourselves and our suppliers to comply with all applicable laws and regulations. This includes the provision of safe working conditions, treating workers with dignity and respect, acting ethically and being environmentally responsible.

This Charter will evolve over time to reflect changing standards in society, the environment, and the digital economy.

We look forward to welcoming you into our growing network of key partners."

Ben Richardson - CEO

Our Supplier Charter is formally incorporated into our contracts with all our suppliers. To the extent that our contractual arrangements contain more detailed requirements in respect of principles covered in this Charter, this Charter is intended to supplement (and not override) those contractual obligations.

If a supplier, or another party in its supply chain, is unable to, or fails to, comply with this Charter, we will discuss this issue with the supplier and may require the supplier to take such steps as we consider necessary to address the impact of, and remediate, the non-compliance.

We reserve the right to amend the Charter from time to time.

The Purpose of this charter

- This Charter aims to establish a clear understanding of what Trustmarque expects of its suppliers and what our suppliers should expect when engaging within Trustmarque.
- Trustmarque works to build long-standing relationships with our suppliers and to ensure our business is conducted ethically, sustainably and within the law, we expect our suppliers and their supply chain to meet the principles set out within this charter.
- As a minimum we expect our suppliers to comply with all local laws and regulations and to respect internationally recognised human and labour rights.
- This charter applies to arrangements with existing suppliers as well as setting expectations for how
 we want to work with new suppliers.



Supplier Charter Domains

Health, Safety and Environment

Trustmarque's <u>Health Safety Policy</u> details how we care for our people and environment wherever we work and whatever hazards may exist. We are committed to always conducting our business activities a manner that prevents the injury and ill health or our employees and others. Our decision making seeks to prevent pollution, reduce carbon emissions and all other environmental impacts.

We Will

- Not compromise on health and safety. We all have a responsibility for ensuring the health, safety and welfare of our employees, contractors, and visitors and all our locations and those working from home
- Work with our suppliers to provide a safe supply chain
- Reduce our carbon footprint, use resources wisely and deliver our service to clients in an environmentally sustainable manner
- Implement processes to manage the risks and opportunities of climate change on our business
- Procure goods and services in a way that minimises environmental impact, whilst still achieving value for money
- Use sustainability criteria in the assessment and selection process for our suppliers

What this means for our suppliers

- Make proper provision for the health, safety, and wellbeing of all your employees, contractors, and visitors, and those in the community who may be affected by your activities
- Providing training at the appropriate level to ensure your employees are capable and competent
- Carry out your business activities with respect to the environment, setting challenging carbon reduction targets, and reporting on your environmental performance
- Ensure a process is in place to assess the impacts of climate change on your company
- Purchase products and services that are ethically sourced
- Where practical, work with us to provide alternative products that are low carbon and more sustainable.

- Provide a safe and healthy workplace
- Act to positively impact our employees' health and wellbeing
- Comply with all applicable health, safety and environmental laws and aim to create a safe working environment for employees and anyone else affected by our businesses
- Collaborate to ensure that we lessen the impact of our operations on the environment and adapt to a lower-carbon economy



Business Ethics

In line with our Code of Conduct, Trustmarque expects the highest standards of ethical conduct in all its endeavours, complying with the law and not engaging in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage.

Our <u>Anti-bribery and Corruption policy</u> details how we operate transparently and with vigilance to deter and support the detection and investigation of bribery and corruption and how we protect our business, our people, and our clients from being victims of financial crime. Our <u>Speak Up policy</u> provides anyone who works with Trustmarque with a secure, confidential way to report genuine concerns. This helps us reduce the risk of financial and reputation loss caused by misconduct.

We Will

- Provide a clear and fair procurement process and seek to build lasting relationships with our suppliers
- Have a zero-tolerance policy with regards to bribery
- Operate our business affairs to the highest ethical standards
- No accept any form of gift, payment or hospitality which may incentivise or reward a business decision
- Identify and manage any situations that could cause a conflict of interest.
- Audit our suppliers to an appropriate level to verify compliance to our standards

What this means for our suppliers

- Flow down the principles and policies of this charter into your supply chain
- Respond to any due diligence requests from us in a timely manner
- Will not offer, give, or accept anything that may be viewed as, or has the effect of influencing a business decision improperly
- Inform Trustmarque of any potential conflicts of interest as so as they are known
- Make use of our Speak Up policy to raise genuine concerns about potential misconduct

- Ensure that we adhere to all applicable laws relating to the prevent of bribery, corruption, fraud, tax evasion of similar related activities
- Comply with competition laws in the countries where we operate
- Protect our business, employees, and customers from being victims of financial crime



Human Rights and Modern Slavery

We believe human rights are basic rights and that every individual should have the freedom to lead a dignified life, free from fear or want, and free to express independent beliefs. We have a zero-tolerance of modern-slavery in all its forms of slavery and servitude.

Our <u>Modern Slavery Statement</u> sets out what we are doing, and our future-plans to identify and eradicate modern slavery within our operations and supply chain.

We Will

- Uphold the ourselves to the highest standards of human and labour rights as detailed in the UN Guiding Principles on Business and Human Rights and the International Labour Organisation (ILO) fundamental conventions on labour rights
- Not accept any form of child labour, or any practice that inhibits the development of children
- Ensure that any and all employment is freely chosen
- Work to prevent all forms of modern slavery within our supply chain
- Work to assess to risk of modern slavery within our supply chain, and engage with our suppliers to understand their approaches and policies

What this means for our suppliers

- Never use or support practices that inhibit the development of children
- Not hold an individual or group in slavery or servitude. This includes any form of physical or mental coercion
- Not use any form of involuntary labour including forced, compulsory, prison, or debt-bonded labour
- Not traffic individuals or groups for the purpose of labour exploitation

What we will achieve together

Uphold the highest standards of human and labour rights as detailed in the United Nations'
 Universal Declaration of Human Rights (UNUDHR) and the International Labour Organisation (ILO) fundamental conventions on labour rights



Responsible Business

Our responsible business strategy sets out our approach to addressing the most material challenges that our business and society face, youth unemployment, digital inclusion, gender equality, climate change and business ethics. Our approach corresponds to the UK Government's Social Value Act 2012 which ensures that through procurement, additional social and environmental value is sought.

We want to work with our suppliers to tackle these issues together and promote and maintain high standards of social, environmental, and ethical conduct.

We will

- We will work with our suppliers to tackle socio-economic issues relevant to both of us, prioritising the themes of our Responsible Business Strategy
- Promote training and awareness of social value and our Responsible Business Strategy
- We are committed to paying our suppliers according to our payment terms in line with the Government prompt payment code, ensuring full compliance on payment terms for our Micro and SMEs
- Pay all directly employed staff the real living wage and work towards becoming a UK accredited living wage employer

What this means for our suppliers

- Demonstrate your approach to tackling global challenges of importance to your business
- Demonstrate the additional environmental and social value of the goods and services you provide to Trustmarque
- Encouraged to work with Trustmarque supporting the delivery of our community programmes
- Agree to adhere to meeting the Government prompt payment code where goods and services you provide to Trustmarque are sub-contracted to Micro and SMEs
- Ensure that any contracted or subcontracted staff that you provide are also paid the real living wage

- We will recognise the value that responsible business activities bring to our respective organisations, thereby mutually reinforcing the need for a strong social and environmental purpose
- We will seek to promote greater use of Micro and SMEs.



Diversity Inclusion and Equal Opportunities

We are a large organisation which employs people from a wide variety of backgrounds, origins, experiences, and cultures. We see diversity as a strength, understanding that all the differences in peoples' skills, education, experience, background, education, age, working style, religion or belief, sexual orientation, race, gender, and other individual characteristics, drives greater effectiveness in decision making through the diversity of thought that this brings.

We seek to promote a culture that appreciates and respects the diversity of our workforce and respects and observes the individual human rights of those who work with us. As detailed in our Diversity, Inclusion and Equal Opportunities Policy, we support equality, diversity, and inclusion.

We recognise that our suppliers are a critical part of our success and innovation. We work with suppliers that not only share our values, but also share our commitments to diversity and inclusion.

We believe that partnering with diverse suppliers creates a culture of equality that allows everyone to advance and thrive

We will

- Treat people fairly and with respect
- We will have a workforce that reflects the diversity of our communities and is inclusive, so that all employees can bring their 'whole selves' to work
- Prevent bullying, harassment, or unlawful discrimination of any kind
- Seek diverse suppliers that bring innovation and disruptive technologies and those that positively impact local communities and the environment
- Actively look to work with all types of business, including those owned or led by under- represented groups including but not limited to women, black and minority ethnic and people with disabilities

What we will achieve together

- Inclusive workplaces where diversity is valued
- Diverse supply chains.

What this means for our suppliers

- Encourage diversity and promote an inclusive workplace which respects and observes the individual human rights of all your employees
- Prevent harassment or discrimination towards employees, including all forms of physical, verbal, or psychological abuse
- Commit to tackling racism, remove bias and provide equal opportunities
- Work to support the growth and development of innovative and disruptive technologies throughout the supply chain



Information and Cyber Security

We expect the highest standards of information and cyber security, regardless of whether information is ours, our clients, or people outside Trustmarque. Everyone has a shared responsibility to keep Trustmarque and our client's information safe, and all IT systems which process digital information secure.

We will

- Identify and manage information risk throughout each stage of our supplier relationships
- Embed information security requirements in formal contracts and obtain assurance that they are met

What this means for our suppliers

- Have established information security policies and procedures in place
- Provide regular information security and data protection training for all staff
- Have implemented IT security controls, e.g., AV, patching, network security
- Have implemented physical security controls, e.g., barriers, CCTV, access control, monitoring
- Conduct pre-employment background checks/ vetting on new employees
- Have implemented risk management protocols,e.g., internal audits, risk audits

- Maintain integrity and confidentiality of our business relationship
- Retain secure and accurate records of all communication and transactions



Privacy

Privacy is very important to us as an organisation. We respect the privacy of individuals and process data in a way which reflects that. When we process personal data (including sensitive or special category personal data), we ensure that we comply with all applicable laws and the instructions of our clients. Such processing includes the collection, storage, use, retention, transfer, and deletion of personal data.

We will

- Process personal data fairly and lawfully and only to the extent necessary for the purpose
- Only process client's data in accordance with their express written instructions
- Ensure all our staff have completed mandatory Data Protection training
- Keep up to date records of processing
- Ensure Privacy by Design and Default is embedded in solutions that process personal data and carry out Data Protection Impact Assessments (DPIA) as necessary
- Investigate any incidents involving personal data without delay

What this means for our suppliers

- Only process the data in accordance with our express written instructions
- Have appropriate technical and organisational security measures in place to protect personal data
- Seek authorisation before engaging sub processors
- Notify Trustmarque immediately of any data incidents
- Assist Trustmarque in the investigation of incidents
- Ensure all staff and sub-processors have received suitable and regular Data Protection training
- Ensure records of processing data are accurate and up to date

What we will achieve together

• Protect privacy and comply with relevant data protection and privacy laws in the countries in which we operate



Resilience

Business resilience involves the ability to foresee, detect, manage, and withstand disruptive events that may prevent the business from functioning. For Trustmarque this means:

- Identifying the elements that are critical to the running of the business; and having measures in place to detect incidents, mitigate their impact and minimise failure
- When unforeseen or unpreventable disruptive events do occur, ensure that arrangements are in
 place to enable a timely recovery to agreed service levels. Such arrangements need to be viable,
 proven, tested annually and assurance provided to Trustmarque that services are recoverable
 within the agreed timeframe

We will

- Ask key suppliers to demonstrate their capability to provide operational resilience, where relevant, as part of supplier selection and adjudication activities
- Assure the ongoing maintenance of business resilience activities with our key suppliers via annual assessments

What this means for our suppliers

- Where relevant, suppliers need to demonstrate their ability to meet Recovery Time Objectives (RTO) and maintain agreed service levels as stated in the contract
- Provide assurance that their 'business as usual' operations provide Trustmarque with continuity of product or service delivery

What we will achieve together

• Provide assurance over our collective ability to remain resilient through periods of disruption



Reporting on Breaches

We require suppliers to report any issues of compliance with this charter to us within five working days, or any shorter period required by regulation or your contract with us. We also expect that the supplier will adhere to any contractual or regulatory timelines where relevant to communicate corrective actions on reported breaches. Where this is not applicable, we expect that within one working month of the reported breach the supplier will provide to us what corrective actions they will take with appropriate timelines. Failure to comply with these timelines will be a breach of this charter

We will

- Respect a culture of staff/contractors speaking up without fear of retaliation against those that report actual breaches
- Carry out appropriate audits of our suppliers as is necessary to verify compliance
- Ensure reports will be treated confidentially and anonymously, where permitted by law
- Investigate any issue raised and discuss findings with the supplier

What this means for our suppliers

- Employees or contractors may report actual or suspected breaches of this charter directly to Trustmarque
- They will assist in any investigation and provide access to any information that is reasonably requested

What we will achieve together

• An open and transparent supply chain that is world leading, setting standards in the workplace, environment, and data protection

Contact

For further information or if you have any queries, please contact our Procurement Team: Procurement@trustmarque.com