

shaw trust

This document is classified as Unclassified.

Shaw Trust – Supply Chain Code of Conduct

The Shaw Trust Supply Chain Code of Conduct aims to ensure that those engaged on Shaw Trust work, whether this as suppliers or sub-contractors will work to uphold the guidelines set forth in the Modern Slavery Act 2015 and maintain exemplary levels of business conduct, diversity and inclusion, working conditions and environmental management through their own operations and throughout their supply chains.

This Supply Chain Code of Conduct states our values and expectations and is used alongside any contractual obligations.

Shaw Trust Values:

We care about people: We support our staff, our volunteers, and the people we work with to realise their potential.

We make a difference: Making a lasting positive impact for the people we support is the reason we exist. We deliver high performance across our services, helping people to improve their lives.

We are inclusive: We value the ideas, views, and strengths of everyone we work with and support. Everybody is different and everybody is equal.

We are collaborative: Working together is more effective and efficient. We believe that by working together with those we support and our partners we create better services and solutions.

We are honest: We are authentic, accountable, and transparent in all we do.

Those engaged on Shaw Trust business are expected to comply to the following and ensure similar good practice is in place with their own supply chain.

Human Rights and Modern Slavery

Organisations working with us shall:

- Comply with all applicable laws (international, national, federal state or local level) and not engage in any activity, practice, or conduct that would be considered an offence under the Modern Slavery Act 2015.
- Respect all internationally recognised human rights behaviours and practices.
- Ensure that modern slavery is not used in the delivery of its services or operations including any forced, bonded, or compulsory labour, or any other forms of slavery, child labour or human trafficking.
- Ensure that all its personnel are given the freedom to choose employment voluntarily.
- Take appropriate action to provide a safe and hygienic working environment.

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- Ensure that all personnel adhere to The Working Time Regulations
- Ensure there are appropriate disciplinary, grievance and whistleblowing processes in place for human rights and modern slavery issues.
- Ensure that all employees understand what modern slavery is, the circumstances in which it can occur, are made aware of modern slavery risk indicators, and are provided with the knowledge on how to identify instances of possible modern slavery and human trafficking.
- Ensure that relevant senior staff have the necessary level of knowledge and understanding of modern slavery risk, to enable them to identify issues and to address them appropriately.
- Notify Shaw Trust immediately if they identify any incidences of modern slavery within its business and/or supply chain.

Safeguarding

Organisations working with us shall:

- Ensure appropriate policies and procedures are in place, which are shared with and followed by all employees and volunteers.
- Ensure that all people using the services, employed by or volunteering are safe.
- Ensure all staff receive safeguarding training and know how to report or escalate any concerns.
- Ensure all Safeguarding policies and procedures are kept up to date, reviewed regularly.
- Notify Shaw Trust immediately if safeguarding concerns are identified within its business and/or supply chain.

Health and Safety

Organisations working with us shall:

- Ensure a Health and Safety policy is in place and is made available to all staff and contractors.
- Ensure the Health and Safety policy is reviewed and updated on a regular basis, including within the stated review periods and when there have been any changes to relevant legislation.
- Ensure the policy is dated and a validity period of the policy is stated ensuring that the policy remains current.
- Ensure individual and organisational responsibilities are clearly outlined with the policy.
- Ensure the arrangements for achieving the policy requirements are met are in place and made clear to staff.
- Conduct appropriate risk assessments to ensure that the health, safety and welfare of staff, contractors and visitors is taken into consideration.
- Ensure that appropriate safety management takes place.

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- Where applicable to the delivery of services, ensure that all audits, inspections of work areas, and review of practices, materials and service quality are reviewed.
- Ensure that Health and Safety training is provided to all staff and reviewed on a regular basis.
- Ensure that there is a procedure in place for reporting accidents, near misses and dangerous occurrences.
- Ensure there is a process in place to support the accident or incident investigations and that any requirements or outcomes are recorded.
- Ensure the policy is validated by the senior management team or executive officer.

Staff Vetting and Safer Recruitment

Organisations working with us shall, prior to the start of employment:

- Review and verify the member of staff's employment history and verify the academic and professional qualifications held by them.
- Verify the identity of the member of staff via appropriate documentation (passport, residence permit).
- Verify the address of the member of staff via appropriate documentation (bank statement, household utility bill, photographic ID).
- Complete any required staff vetting to the required level e.g., DBS, including any renewals as required.
- Verify the staff member is legally entitled to work in the UK and complete checks to confirm immigration status.
- Ensure the member of staff confirms they are free to work and accept the employment offer without breaching any prior contractual obligations, restrictions, or court orders.
- Undertake a compliance check, where appropriate and reasonable, to identify any potential links to bribery, corruption, fraud, money laundering, terrorism, and any other risks.

If the vetting procedures undertaken by the Organisation identifies an issue with the member of staff, which would reasonably be a concern, the Supplier or Supply Chain Partner is required to notify Shaw Trust and ensure that the individual is not involved in the provision of the Services until approved by Shaw Trust. Regardless of approval, the Supplier remains liable for the acts and omissions of its staff.

Diversity and Inclusion

At Shaw Trust we are committed to having diverse Suppliers and Sub-contractors. We believe it is essential that our services reflect and support the communities we serve, including those who are disadvantaged in society. Greater diversity of Suppliers and Sub-contractors brings innovation, understanding and ideas, which improves the service delivered to our customers.

By broadening supplier diversity, those working with Shaw Trust can:

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- Support local businesses and communities.
- Improve engagement and inclusion with Supply Chain Partners.
- Identify new Organisations to work with.
- Create new opportunities for organisational growth.
- Enhance the ability to understand and shape services for the community.
- Improve sustainability.

Organisations working with us shall:

- Ensure a Diversity and Inclusion Policy is in place and is made available to all staff.
- Ensure the Diversity and Inclusion policy is reviewed and updated on a regular basis, including within the stated review periods and when there have been any changes to relevant legislation.
- Ensure individual and organisational responsibilities are clearly outlined with the policy.
- Ensure a Diversity and Inclusion Action Plan is linked to the policy and reviewed regularly.

Disability Confident

Shaw Trust is a Disability Confident leader, who looks to work with Organisations who are already committed to the Disability Confident Employer Scheme or are willing to work towards obtaining Disability Confident status within a reasonable time period.

Disability Confident is a FREE government scheme designed to help employers make the most of the benefits of employing disabled people.

To adhere to the Disability Confident Standard, employers must be dedicated to ensuring equal employment opportunities for individuals with disabilities, including those with physical, mental health and long-term health conditions.

Please use the link below to find out more about Disability Confident or speak to us.

[Disability Confident employer scheme - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/disability-confident-employer-scheme)

Protection of the Environment

Organisations working with us shall:

- Operate in a manner that protects the environment.
- Adhere to all relevant local and global environmental laws, regulations, and standards, including the proper handling, recycling, treatment, reduction, and responsible disposal of hazardous and non-hazardous chemicals, waste, and industrial wastewater, as well as storm water management, air emissions

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control measures, boundary noise levels, environmental permits, and reporting.

- Where possible, commit to consistently improving its environmental performance by prioritising energy and natural resource conservation, advocating for recycling, and mitigating and minimising any negative impact on the environment from itself or its supply chain.

Ethical Business Practices

Organisations working with us shall:

- Comply with the Bribery Act 2010.
- Ensure staff are aware of policies in relation to anti-bribery, anti-corruption, fraud prevention, money laundering prevention, information disclosure and prohibited business practices.
- Not offer, promise, make, or agree to make payments or gifts (of money or anything of value) directly or indirectly to anyone for the purpose of influencing, or encouraging anyone to influence decisions, in favour of any party.
- Establish an anonymous whistle-blower complaint system for managers and employees to report workplace grievances. The confidentiality of those who report grievances must be safeguarded.
- Not violate or threaten to violate the basic rights of Shaw Trust's intended beneficiaries, or query or threaten to query the goodwill and reputation of Shaw Trust.
- Have a process for communicating clear and accurate information about its performance, practices, policies, and expectations to its workers, suppliers, customers, contractors, and stakeholders.

To ensure effective implementation of the Shaw Trust Supply Chain Code of Conduct, organisations working with us are expected to meet the following requirements:

Compliance

- Meet the expectations in the Shaw Trust Supply Chain Code of Conduct.
- Maintain policies, procedures, and training for personnel.

Ongoing Monitoring and Due Diligence

- Provide information and assurance regarding compliance with the Shaw Trust Supply Chain Code of Conduct; and when requested, complete audit and due diligence requests.

Report and Remedy Non-Compliance

- Notify Shaw Trust immediately if the Supplier or Supply Chain Partner has any concerns in relation to its compliance with the Shaw Trust Supply Chain

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Code of Conduct or identifies any non-compliance within its own business or supply chain: and

- mitigate any failure to comply with the Shaw Trust Supply Chain Code of Conduct, as part of continuous service improvements.