

Procurement Department



CODE OF CONDUCT



Contents

Introduction	3
Human Rights inc. Modern Slavery	4
Employment is freely chosen.....	4
Freedom of association	4
Working conditions are safe and hygienic	4
Child labour should not be used	4
Working hours are not excessive.....	4
Statutory Minimum Wages.....	4
No discrimination should be practiced	5
Treating employees with respect	5
Diversity and Inclusion.....	5
Health & Safety	5
Confidentiality and data protection	5
Information Security.....	5
Use of Social Media.....	5
Environmental Compliance	6
The Environment	Error! Bookmark not defined.
Ethical Compliance	7
Bribery Act.....	7
Supply Chain	7
Finance Regulations.....	7
Taxation	7
Staff Protection.....	7
Conflict of Interest	7
Management.....	8
Reporting	8
Compliance.....	8
Other documents	9

Introduction

The Procurement Department's vision is to become a sector leading procurement function that supports the University's vision and operating model. It will strive to lead in the education and other sectors in its approach to delivering procurement activities. The Department will focus on three strategic priorities:

- Strategic leadership in procurement
- Improved collaborative procurement
- Improving capability and capacity in procurement
- Integrating corporate social responsibility and environmental sustainability in procurement.

The University is committed to complying with laws and regulations in the pursuit of excellence in the way that it procures goods and services. These activities will be carried out in a manner that follows University policies and procedures and achieves value for money wherever possible. Our procurement policies aim to contribute to the wider [University Sustainability Policies](#) and to meet many of the UN Sustainable Development Goals.

"...Embedding sustainability practices across the University's operations to become a leader in global environmental sustainability."



In delivering these commitments, we must ensure adherence to the highest standards of ethical and professional behaviour. This Code of Conduct sets out the matching behaviours that we expect of suppliers who are delivering goods and services to the University.

As part of the supplier selection process, appropriate due diligence checks will be carried out to ensure that the University is contracting with reputable Organisations. These checks are conducted in line with procurement procedures and other relevant regulations that guarantee fair access to opportunities, anti-corruption and equal treatment for all suppliers. The University will also engage and work closely with SME's and look at ways to make it easier for them to access and participate in opportunities.

We will work with our supply chain as a whole to make sure that they have the right policies and processes to comply with our requirements.

The University will always treat all suppliers fairly, equally and objectively. All reasonable attempts will be made to assist suppliers to overcome difficulties. All our suppliers should uphold the highest standards of integrity, transparency and governance and we reserve the right to request that suppliers complete a code of conduct agreement and provide certification and evidence as required.

Human Rights and Modern Slavery

Employment is freely chosen

Your employees should be free to leave their employment after giving reasonable notice and are not required to lodge deposits or payment with their employers. There should be no forced, bonded or involuntary labour. Your employees should have a written contract of employment, which needs to comply with local legislation and be clear about wages. Wages and benefits need to be in accordance with relevant legislation. All deductions from wages should be lawful and with the expressed permission of the employee.

Freedom of association

Your employees should be free to join or form trade unions and to bargain collectively, in accordance with relevant legislation. Your employees should not be discriminated against for their membership of trade unions, or representative functions.

Working conditions are safe and hygienic

A safe and healthy working environment should be provided, with hazards minimised and adequate steps taken to prevent accidents and injury occurring in the course of work. Appropriate policies and procedures should be in place and responsibility should reside with a senior management representative.

Child labour should not be used

The recruitment and use of child labour should be banned/prohibited in any circumstances. Comply with the national minimum age for employment, or minimum age 15, whichever is the higher unless a lower local minimum age is permitted under International Labour Organisation (ILO) convention 138.

Working hours are not excessive

Working hours must comply with national laws, collective agreements and all overtime must be voluntary. Your employees should have access to rest periods and employee time off.

Statutory Minimum Wages

At least statutory minimum wages must be paid without discrimination to all employees and all non-statutory deductions must be with the consent of the employee.

No discrimination should be practiced

There should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, social or ethnic origin, religion, age, gender, marital status, sexual orientation, disability, maternity, union, or political affiliation. Where required policies on diversity, discrimination, harassment and whistleblowing should be in place.

Treating employees with respect

Your employees should never be exposed to abuse, harassment, discrimination or intimidation. Your employees should have access to a grievance procedure.

Diversity and Inclusion

The University expects its suppliers to have a Diversity and Inclusion policy equal to its own. We encourage all of our suppliers to align themselves with the guidelines on equality in the workplace as published.

Health & Safety

Policies and processes must be in place for recording and eliminating occurrence/reoccurrence of health and safety related incidents. All equipment must be safe for use and processes must allow a safe working environment

Confidentiality and data protection

Suppliers shall protect personal data and confidential information against unauthorised and unlawful use, disclosure, access, loss, alteration, damage and destruction.

Information Security

All suppliers or third parties that require access to the University information systems or process personal data on behalf of the University as part of the services they provide must comply with the University of Reading Information Security Policies. Further information and our Information Security Policy can be found on the [Information Compliance](#) webpage.

Use of Social Media

Suppliers are to refrain from disrespectful, unprofessional, harassing, defamatory, discriminatory and prohibited activity on social media platforms.

Environmental Compliance

- 1 The University acknowledges its responsibilities in carrying out all procurement activities in a socially responsible and environmentally sustainable manner.
- 2 The Procurement Department will embed sustainable procurement practices into all of our operations and work collaboratively with all suppliers and stakeholders to ensure compliance with all relevant employment and environmental legislation, taking into consideration the following actions:

2.1 Work with suppliers to:

- i) Make them aware of the University's [Sustainability Policies](#) and requirements relating to the University's environmental/energy management systems (EMS (ISO14001) / EnMS (ISO50001).
- ii) Explore circular economy opportunities for recycling, reconditioning and re-use of materials as appropriate.
- iii) Help them understand the University sustainability objectives and find lower impact alternatives.
- iv) Spread sustainability improvements throughout the supply chain.
- v) Deliver environmentally responsible products and services through a low carbon and environmentally sustainable supply chain to reduce our Scope 3 emissions.
- vi) Encourage the University's Contracted Suppliers to include SMEs and local suppliers in their supply chain.

Ethical Compliance

Anti-Bribery and Corruption

The University has policies in place to address the Bribery Act 2010, and as a minimum, we expect all our suppliers to adhere to relevant legislation. Inappropriate gifts will be returned and only modest hospitality should be offered.

Supply Chain

Support fair trade conditions for producers, where they exist. Appoint sub-contractors through an open and fair process such as public advertising of such opportunities wherever possible. Act at all times with respect and integrity, including open and transparent accounting. Not force unsustainable or unfair contract terms on their suppliers, or throughout their supply chain, nor allow unfair exploitation of a dominant market or customer position.

Finance Regulations

The University does not tolerate economic crime including money laundering, and financing terrorist activities. As a minimum, we expect all to comply with all financial regulations and taxations of the countries they are working in, manufacturing in or trading with, as applicable.

Taxation

The University of Reading is dedicated to conducting all its academic, administrative and commercial operations in a law-abiding and ethical manner and will not tolerate acts of tax evasion or criminal facilitation of tax evasion by its staff or its associates in any jurisdictions. It has appropriate policies and procedures in place to prevent such criminal acts and expects its Suppliers to have similar policies and procedures.

Staff Protection

Allow staff protection if reporting misconduct or raising concerns with respect to their own, or another organisation, and ensure all affected staff are treated in a fair and transparent manner.

Conflict of Interest

If a Third Party becomes aware of an actual or potential conflict of interest or a sensitive situation that may impact its work for or with the University or otherwise, it shall notify the University on a timely basis. Depending on the circumstances, Third Parties may be required to put in place appropriate measures to manage the conflict of interest or sensitive situation.

Management

Suppliers should adopt and apply fair and ethical practices respecting internationally recognised fundamental human rights standards, including the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights to Work, all international covenants and International Labour Organisation conventions.

Suppliers must have and maintain throughout the term of their relationship with the University its own policies and procedures and where appropriate provide training to staff.

Reporting

We encourage Suppliers to write, in confidence, to the Director of Procurement to raise any suspicion of modern slavery, concern or issue in any part of our business or related supply chain.

Compliance

The overall objective of this Supplier Code of Conduct is to drive improved performance throughout the Universities supply chains, by building trusting and open relationships with our supply base. Suppliers who provide goods or services to the University, are expected to comply with all aspects of this code. Suppliers should be open and transparent in relation to breaches or suspected breaches of this Supplier Code of Conduct and should promptly notify the University of any such breach. If non-compliance with the requirements of this code is reported or alleged, the first step is for the University to discuss it with the supplier.

Other documents

This document should be read in conjunction with the following:

University Policies and Reference documents

<http://www.reading.ac.uk/internal/academic-and-governance-services/AGS-policies.aspx>

Procurement Department “Information for Suppliers”

<https://www.reading.ac.uk/procurement/information-for-suppliers/proc-informationforsuppliers.aspx>

Modern Slavery Statement

<https://static.reading.ac.uk/content/PDFs/files/GovernanceZone/Anti-slavery-statement-November-2023.pdf>

Estates “Site rules for working on University premises”

<http://www.reading.ac.uk/buildingmaintenance/OurPoliciesandProcedures/bmaint-policies-and-procedures.aspx>

Environment & Sustainability Team Policies, Strategies & Reports

<https://sites.reading.ac.uk/sustainability/policies-and-strategies/>

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