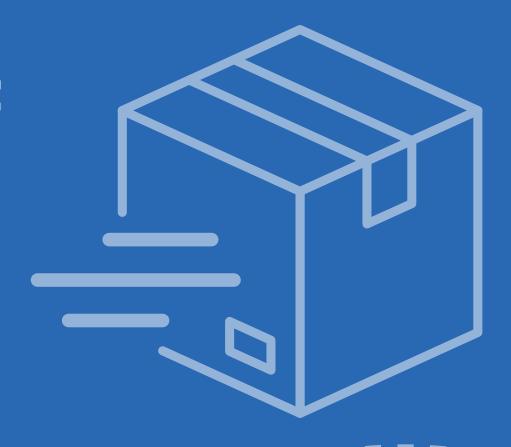


Supply Chain Code of Conduct





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Social Compliance Suppliers must:

Not use forced, involuntary or underage labour

- 1.1 Ensure workers are free to choose their employment and leave that employment on reasonable notice without hold of financial deposit or personal items.
- 1.2 Not use forced, bonded or involuntary / prison labour.
- 1.3 Not engage in any way with human trafficking, nor support or work with organisations that engage in any way with human trafficking activities, organisations or persons.
- 1.4 Ensure recruitment fees, if applicable, are always borne by the employer only.
- 1.5 Actively exceed the requirements of any anti-slavery / modern slavery legislation in any country that they operate in and comply with any voluntary and mandatory publication schemes in place to provide transparency of this activity.

- 1.6 Support the effective abolition of child labour.
- 1.7 On PCH and residential property, all supplier staff should be a minimum of 16 years old, with 16-17 year old's accompanied by an adult of 18 years+. Comply with the national minimum age for employment, or minimum age 14, whichever is the higher unless a lower local minimum age is permitted under International Labour Organisation (ILO) convention 138.
- 1.8 Ensure where any child is found to be engaged in or performing child labour, to provide support for that child to enable them to complete, as a minimum, their compulsory education (even if they shall cease to be involved in child labour), or an equivalent education level, as provided for under the UN Covenant on Economic, Social and Cultural Rights. Such support by the supplier should recognise and not prove detrimental to the conditions of the child or those that their work supports.



With respect to Working Environment and Terms Suppliers must:

General

- 2.1 Ensure at least statutory minimum wages (or if none, a realistic living wage) are paid without discrimination to all workers, and all non-statutory deductions must be reasonable and with the consent of the worker.
- 2.2 Ensure that working hours are not excessive (not over 48 hours per week, excluding overtime) and must allow for at least 1 day off for each 7-day period on average or, where allowed by national law, 2 days off in every 14-day period. Working beyond this should be non-regular and of workers' own will and not used to replace regular employment. Maximum working hours shall not exceed 60 hours including overtime, unless under exceptional circumstances and allowed by national law.

Health and Safety

- 2.3 Ensure a safe and hygienic working environment is provided, including any catering, washroom or accommodation areas. Any hazardous working, as defined by ILO, should only be carried out by persons aged 18 years or over. Hazardous work includes, but is not limited to:
 - Exposure to physical or psychological danger / abuse.
 - Work underground, underwater, at dangerous heights, or in confined spaces.
 - · Work with dangerous machinery, equipment, or tools.
 - · Handling heavy loads manually.
 - Work in unhealthy environments (e.g., exposure to hazardous substances, extreme temperatures, noise, or vibrations).
 - Work under particularly difficult conditions (e.g., long hours, night shifts, or confinement to the employer's premises).

2. Working Environment and Terms

- 2.4 Ensure all equipment is safe for use, and processes must allow a safe working environment. Workers must receive training (which must be mandatory to attend and be in a language they can understand) in safe operation of all equipment and tools. Training must be provided as frequently as required to remain effective.
- 2.5 Use best endeavours to eliminate (in the first instance) and to reduce the threat to workers health from all hazards, including any hazardous chemical agents used in manufacturing and/or supply chain activities and provide mandatory training (in a language workers can understand) in the safe use of any harmful chemicals.
- 2.6 Provide all personal protective equipment necessary to ensure the health and safety of workers.
- 2.7 Ensure policies and processes are in place for recording and eliminating occurrence/reoccurrence of health and safety related incidents and they should have regard to avoiding the cause of any mental health issues affecting workers.

Worker Rights and Behaviours

- 2.8 Allow workers the freedom of association to join (but not be forced to join), or be represented by, a trade union or similar organisation of their choice, and be free to leave such organisations. Representatives of workers must be elected by the relevant workers, not appointed by management.
- 2.9 Not discriminate or unfairly treat any worker for any reason including education, social class/caste, nationality, trade union membership, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, culture, religion or belief, sex, or sexual orientation in adherence with the Equalities Act 2010.
- 2.10 Provide a workplace free from discrimination, bullying, harassment, violence or victimisation and one that does not tolerate the use of discriminatory language and actions.
- 2.11 Ensure the principles of equality, diversity and inclusion are fully respected for all workers, treating all workers with respect and dignity, and not accept inequality as justifiable for any reason.

2. Working Environment and Terms

- 2.12 Ensure that workplaces, practices and services are accessible and inclusive through the implementation of reasonable adjustments where necessary and possible.
- 2.13 Remunerate all workers equally at the same employment grade, regardless of any characteristics listed above, unless statutory conditions require otherwise.
- 2.14 Ensure effective worker engagement practises are in place to such an extent that all workers are clear of their duties and their employment rights under local and international laws.
- 2.15 Ensure all representatives of suppliers, whilst on or near the institution's premises, or while interacting with any member of staff, student, or member of the public, behave in a respectful and polite manner and in accordance with the institution's equality, diversity and inclusion standards.
- 2.16 Treat anti-social behaviour, domestic violence, disability related harassment and hate crime extremely seriously, seeking to resolve incidents, take appropriate enforcement action and ensure that such incidents are not repeated.



With respect to Ethical Compliance & Economic Development Suppliers must:

- 3.1 As a minimum, comply with all laws, regulations and financial/tax legal requirements of the countries they are working in, manufacturing in or trading with, as applicable.
- 3.2 Not be involved in any way with acts of corruption or bribery, participate in anti-competition practices/cartels or support acts of violence or terrorism or abuse of individual people or communities, noting that PCH has an Anti-Fraud, Bribery and Corruption Policy and Anti-Money Laundering Policy that must be adhered too.
- 3.3 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.
- 3.4 Support fair trade conditions for producers, where applicable.
- 3.5 Always act with respect and integrity, including open and transparent accounting.

- 3.6 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.
- 3.7 Have undertaken due diligence of their supply chains and impacts caused by their activities and actively seek out ways in which to minimise such negative impacts.
- 3.8 Comparable safe working conditions for all employees whether directly or indirectly employed
- 3.9 Ensure all suppliers in their supply chain comply with the UK Government Prompt Payment Policy.
- 3.10 When selecting subcontractors' selection will be carried out in an ethical, fair and transparent manner. Contract terms should be applied in good faith (especially pertaining to payment terms, duration and warranties).
- 3.11 Where possible creating social value via developing local supply chains to create employment, apprenticeship and training opportunities including actively participating in local social responsibility projects that benefit the local community.

With respect to Environmental Compliance Suppliers must:



General

- 4.1 As a minimum, comply with all local and national environmental laws, regulations and directives of the countries they are working in, manufacturing in or trading with, as applicable.
- 4.2 Actively minimise causing environmental damage and/ or negative environmental impact through raw material source, manufacturing processes, supply of the goods or services and disposal of supply chain waste.
- 4.3 Minimise negative impact on nature and biodiversity and promote thriving green spaces where possible.
- 4.4 Suppliers must protect and minimise use of clean water sources through reduced use of pollutants and toxic chemicals and increase water use efficiency through measures such as recycling and re-use of grey water in manufacturing, desalination, water harvesting and wastewater treatment where possible.
- 4.5 Work towards developing and innovating more environmentally friendly products/service solutions and take manufacture, use and disposal into consideration, including the possibility of circular supply chains.

- 4.6 When having more than 10 full time employees, or a turnover over £2million, have a business plan in place, and be acting on it, to minimise, through continual improvement, environmental impact year on year (inclusive of carbon reduction) and adopt or work towards internationally recognised environmental standards, measuring and monitoring its environmental impacts, and ensure measures are in place to effectively reduce identified environmental impacts (e.g. recycling, circular economy practices, reduced waste, energy efficiency measures).
- 4.7 Take active steps towards the elimination of excessive packaging and single use plastics through volume reduction and increase of recycled content in plastics and packaging materials.

Global Climate and Ecological Emergency

4.8 We are setting ambitious targets encompassing all three scopes of the Greenhouse Gas Protocol and have set 2050 as our net zero target. We require our suppliers to support us in this task. The Supplier must support the aims of PCH in reducing the climate emission impact of its supply chains, including having clear and verifiable plans and actions in place, where to do so is reasonable and proportionate to the nature of the goods and services provided.

With respect to Residential Property Suppliers must:

- 5.1 Work to their company's method statement and risk assessments which must have been approved by PCH Health & Safety Team.
- 5.2 Have in place a risk assessment, method statement with strict control measures in place to protect themselves and others.
- 5.3 Including their staff and representatives who undertake work on behalf of PCH: -
 - 5.3.1 Always give no less than 24 hours written advanced notice, e.g. text, email or letter (including following a call if made), save where emergency access is required, and attempt to obtain the resident's agreement before commencement of works. Normal working hours are between 8:00am to 5:00pm Monday Friday.
 - 5.3.2 Keep records of all attempts, whether access successful or otherwise, of **written advance notice.**
 - 5.3.3 Will carry and clearly display identity cards when calling at a resident's home.

- 5.3.4 Ensure that where English is not the first language translation services are available, and that publications are in an appropriate language.
- 5.3.5 Treat all residents with respect and dignity, considering residents' culture, vulnerability and religion and refrain from entering if requested.
- 5.3.6 Shoes are not to be removed if requested, overshoes must be used where dusty, dirty work is taking place.
- 5.3.7 Ensure an escape route is always maintained for all occupants and workers, taking individual needs such as mobility into account and that consideration is given to blind or deaf tenants (provide information on tape, Braille or large type if appropriate).
- 5.3.8 Treat tenant's home as you would your own. Respect home and belongings.
- 5.3.9 Conduct themselves in a proper manner and will not use foul or abusive language.

5. Residential Property

- 5.3.10 Explain and agree the scope and location of works to be undertaken before starting.
- 5.3.11 Keep the area they are working in clean and tidy at all times where practical during the work.
- 5.3.12 Prevent machinery, materials and trailing cables from obstructing roadways, paths, gangways or public open spaces.
- 5.3.13 Ask permission if a supply of water or electricity is required and agree and offer to compensate tenants before use if it is a metered service.
- 5.3.14 Take all reasonable steps to protect carpets, fixtures and fittings.
- 5.3.15 Keep external doors and windows securely shut (except when repairing or repainting or when a need to ventilate).

- 5.3.16 Consult PCH asbestos report / survey prior to performing intrusive / destructive alterations to the fabric of the building.
- 5.3.17 If an asbestos register / assessment is not available, the supplier must not complete any works. PCH have a duty of care to provide the assessment prior to starting works.
- 5.3.18 Will report any <u>safeguarding</u>, <u>building safety</u>, or damp or mould issues (<u>Awaab's law</u>), gas or legionella concerns they encounter when visiting residential or commercial property to PCH.
- 5.3.19 Will comply and take appropriate action in accordance with any purchase order and associated documents issued particularly concerning any health and safety aspects.



5. Residential Property

5.4 Will not:

- 5.4.1 Enter a property unless the resident or their representative is present and never enter a property if only an unaccompanied child (ie under 18 years old) is present.
- 5.4.2 Engage in any behaviour that could be interpreted as biased, discriminatory or offensive or act in any way that threatens the safety, wellbeing or dignity of residents.
- 5.4.3 Treat any resident less favourably due to any of the characteristics detailed in the Equalities Act 2010.
- 5.4.4 Use or move any resident's belongings without their express permission.
- 5.4.5 Use residents' telephones.
- 5.4.6 Use residents' washing or toilet facilities without their express permission.

- 5.4.7 Use residents' cooking facilities or eat in their home.
- 5.4.8 Drink alcohol or smoke or vape in or around resident's houses.
- 5.4.9 Burn, bury or leave any rubbish, equipment or other items on your premises.
- 5.4.10 Not throw or drop articles from heights but will lower them in an appropriate and safe manner or via a properly constructed chute.
- 5.4.11 Leave tools, materials or gas bottles in resident's homes overnight.
- 5.4.12 Play radios whilst on site.



Other Mandatory Policies Suppliers must:

- 6.1 Be aware of our <u>Quality Policy</u> in support of <u>ISO9001</u> accreditation with particular attention to our quality objectives, how suppliers contribute to its effectiveness and improved performance, and implications of not conforming to our quality management system requirements.
- 6.2 Where applicable to the task, works or service being provided comply with:
 - 6.2.1 Asbestos Management Policy
 - 6.2.2 <u>Building Safety Policy</u>
 - 6.2.3 <u>Data Protection Policy</u>
 - 6.2.4 Fire Safety Management Policy
 - 6.2.5 <u>Health and Safety Policy</u>

Supplier Commitment

Suppliers to PCH shall commit to responsible procurement and shall adhere to the PCH Supply Chain Code of Conduct ensuring its supply chain adheres to this Code of Conduct in order to promote sound social, ethical, environmental and economic practises.



EMT

25 September 2025

25 September 2028

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