

# Supplier Code of Conduct

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## Introduction

#### Who we are

At Leeds Building Society we have been helping people save money and have the home they want for over 140 years. Since the very beginning we've been a mutual, owned by and run entirely in the interests of our members, the people who have savings and mortgages with us. We are committed to:

- Putting home ownership within reach of more people, generation after generation
- Remaining a member-owned building society
- Taking a zero tolerance approach to bribery, fraud, money laundering and corruption
- Treating our members fairly
- Doing what's right for our colleagues
- Doing what's right for our communities

# Supplier Relationship Management Governance

As part of our supplier on-boarding process Leeds Building Society will carry out due diligence checks on all organisations we are considering working with. Suppliers will be risk assessed and, where appropriate, may be asked for annual evidence of adherence to this code. Part of these checks may require us to visit your premises for an on-site assessment. Leeds Building Society will communicate any changes to this code.

## What we expect of our suppliers

As a supplier to the Society, we expect you to comply with our Supplier Code of Conduct. This means that we require you to comply with all relevant laws, regulations and contractual agreements, to be aligned to our Behaviours and commit to the continual improvement of business practices. The Code of Conduct should be cascaded to your employees and sub-contractors who support any service you provide to us.

We ask that you inform us of any possible or actual changes which have the potential to prevent you from complying with the Supplier Code of Conduct as soon as you become aware of them.

We also ask that you let us know of any changes we could make to our relationship with you to enhance our joint efforts in undertaking ethical, responsible and sustainable business.

# **Code of Conduct Key Principles:**

As a minimum, we expect you to:

#### **Business Ethics**

- Suppliers are expected to maintain the highest standards of integrity in all business relationships and reject and report any business practice or approach which might reasonably be deemed improper and to declare to Leeds Building Society any business or personal interests that affect or might be perceived by others to affect impartiality or decisions.
- Comply with all applicable legislation (including privacy and data protection laws), regulations and Society policies and standards which are relevant to the service you provide to us.
- Maintain sufficient policies, practices and procedures to ensure compliance with applicable legislation, regulations and Society policies and standards.
- Maintain proportionate business continuity plans that clearly detail what will happen in the circumstances of an unforeseen event, and are tested at least annually if you provide a critical service to us (we will let you know when contracting with you if this applies).
- Provide employees with adequate training and information, to allow them to fulfil their key responsibilities effectively and comply with these standards.
- Adopt a zero-tolerance approach towards bribery, fraud, money laundering and corruption.
- Refrain from offering gifts to Society colleagues and only offer hospitality within the Society's rules (e.g. gifts below £50 and corporate hospitality may be acceptable some of the time, but never during tendering & contracting periods).
- Disclose to us and help us to manage any actual, potential or perceived conflicts of interest with regards to your relationship with us.
- Promote a culture that encourages employees to raise concern about potential breaches of law, regulation, ethics or trust.
- Notify the Society as soon as you become aware of any events or incidents that actually or potentially impact on the service, customers or reputation of Leeds Building Society (particular security related incidents). Suppliers must have in place contingency plans to protect the interests of the Society and its customers in the event of any disruption to the services they provide.
- Operate appropriate tax arrangements to ensure that your business pays the right amount of tax at the right time.
- Suppliers shall implement and keep a record of due diligence procedures for its own suppliers and subcontractors in its supply chains, to monitor and ensure that there is no Modern Slavery in its supply chains.

#### **Social Responsibility**

- Maintain and practise a Health & Safety policy that ensures a safe working environment for everyone involved in your relationship with us.
- Be committed to doing everything reasonably possible to help eradicate modern slavery and human trafficking in your supply chain. Suppliers shall not engage in any activity, practice or conduct that would constitute an offence involving Modern Slavery and human trafficking. Associated policies and procedures are designed to ensure that ethical behaviour forms the bedrock of all aspects of business.
- Maintain an approach to fair remuneration which pays at least the real Living Wage to all your employees and contractors working regularly on Society premises.
- Align to the payment practices within the Prompt Payment Code particularly in relation to sub contractors supporting your service provision to the Society.
- Offer fair and ethical employment practices, which commit to providing equal opportunities and promote diversity in your workplace, to your employees.
- Offer initiatives which promote the social, mental, physical and financial wellbeing of your employees.
- Make a positive impact in your local communities.

### **Environmental Sustainability**

- Understand, manage and minimise the environmental impact of your business particularly in relation to the services you provide to the Society.
- All required environmental permits, approvals and registrations are to be obtained, maintained and kept current and associated operational and reporting requirements are to be followed.
- The use of resources and generation of waste of all types, including water and energy, to be monitored and reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

# **Our Reporting Requirements**

At least annually, we will ask you to attest to your continued compliance with the Key Principles above. Evidencing your compliance might take one of the following forms which are listed for illustrative purposes only:

- Provision of your latest Modern Slavery Act Transparency Statement
- Provision of current Certificates of Insurance where relevant
- Provision of your latest business continuity tests if applicable to your service provision
- A Gifts & Hospitality return
- Evidence of your company's Living Wage accreditation

## **Definitions**

#### Supplier/third party

In the context of the Supplier Code of Conduct, the terms supplier and third party are interchangeable and are defined as any third party organisation which provides goods and/or services to the Society. This definition does not include sole contractors or mortgage intermediaries.

#### Relationship Manager

A Society colleague with responsibility for the management of a supplier relationship

#### How to contact us

If you have questions on the Supplier Code of Conduct or you need to advise us about a change in your circumstances which has the potential to affect your ability to comply with the Code, you can contact us in one of the following ways:

- Making direct contact with your Relationship Manager at the Society
- If you are a critical supplier to the Society, connect with your Procurement contact in the first instance
- Email us at **TPMT@leedsbuildingsociety.co.uk**

If you need to submit an invoice to us or have a query relating to your account, please email invoices@leedsbuildingsociety.co.uk

#### **General Notes**

Please note that this Supplier Code of Conduct and the provisions set out in it are in addition to and not in lieu of any legal agreement you have in place with the Society. In the event any provisions in the Code conflict with your contractual terms and conditions, those terms and conditions will take precedence.

In the event you are not yet compliant with any of our minimum expectations, we will work with you to reach compliance. In cases where issues arise which either cannot be resolved in a reasonable timeframe or constitute material non-compliance with the Code, we reserve the right to review your contractual terms and conditions up to and including termination.

We will review and update the Supplier Code of Conduct on an annual basis in line with our annual review of associated Society Policies and Standards and keep you informed of any changes.