

INTEGRATED MANAGEMENT SYSTEM POLICY



GROUP SUPPLIER CODE OF CONDUCT

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PUBLIC



seven technologies group

Version: 1
Issue Date: 30/07/2018
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Approved by: Roland Barzegar

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COM0035 - GROUP SUPPLIER CODE OF CONDUCT

DOCUMENT CONTROL INFORMATION

Amendment No	Issue No	Date	Brief details of amendment(s) to procedure test
-	1	05/06/18	Original Release

REFERENCED DOCUMENTS

Ref	Document Number & Title	Notes
1		
2		
3		
4		
5		
6		

APPLICABLE DOCUMENTS

Ref	Document Number & Title	Notes

ACRONYMS

Acronym	Meaning



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1 Purpose

Seven Technologies Group is committed to the highest legal and ethical standards and expect the same of our subcontractors, suppliers and representatives (collectively, “suppliers”). The principles contained within this Supplier Code of Conduct therefore represent the minimum standard that our suppliers must uphold when doing business with Seven Technologies Group and its employees.

1.1 Content, Scope and Applicability

This document contains a summary of the ethical standards that our suppliers and representatives must adhere to. In many cases, this document will refer out to legal obligations or more detailed policy documents; it is your responsibility to ensure that you understand these requirements.

2 Points of Contact

Should you have any concerns over these principles, or how they relate to your business, please contact Seven Technologies Group using the contact details below:

Email: enquiries@seventechgroup.com

Tel: 01132 395350 (if directed to switchboard, please ask to speak to the Commercial Manager)

3 Employment Matters

3.1 Forced Labour and Modern Slavery

Suppliers must not use involuntary, forced or child labour of any kind and are required to take reasonable steps to prevent the occurrence of such practices in its own supply chain. All of our suppliers are expected to pay their workers and employees the legal minimum wage in their home country, or a fair living wage if no legal minimum exists. Furthermore, we expect our suppliers to adhere to pay equality, meaning that employees and workers carrying out equivalent roles will be paid equally regardless of their gender, ethnicity or other personal circumstances.

Your attention is also drawn to the Modern Slavery Act 2015, Seven Technologies Group’s Anti-Slavery and Human Trafficking Policy¹ and any equivalent overseas legislation.

¹ Available on request at the contact details stated in Section 1 of this document.



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3.2 Diversity and inclusion

Suppliers are required to provide equal opportunities and to take a 'zero tolerance' approach to all forms of discrimination.

Furthermore, all suppliers and their employees are expected to treat their own staff and Seven Technologies Group's staff with respect. We will not tolerate threatening, abusive or coercive behaviour of any sort.

Your attention is drawn to the UK Equality Act 2010 and any equivalent overseas legislation.

3.3 Quality Assurance

We expect to be able to rely on our suppliers to deliver high quality goods and services. All suppliers are therefore required to demonstrate their commitment to quality, including open disclosure of their quality management processes and relevant certification.

We encourage open dialogue regarding quality and welcome all suggestions from our suppliers to improve the quality and reliability of our products and processes. Suppliers engaged in critical or complex work are expected to be certified to ISO:9001 and, as a minimum, adhere to the principles of ISO:27001. All other suppliers should also consider certification to these standards.

3.4 Legal Compliance


We expect our suppliers to act lawfully in all regards. Your attention is drawn specifically to the following legal requirements.

3.5 Anti-Bribery and Corruption

Corruption is detrimental to society and undermines free competition. As such, all of our suppliers are expected to act ethically in conducting business and to avoid bribery of all types. For the avoidance of doubt, bribery includes any payment, gift or hospitality that is intended to improperly influence a business decision; bribery also includes facilitation payments. This applies to all commercial dealings, whether directly with Seven Technologies Group or any other entity.

Your attention is also drawn to the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977, Seven Technologies Group's Anti-Bribery Policy² and any equivalent overseas legislation.

² Available on request at the contact details stated in Section 1 of this document.

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3.6 Conflicts of Interest

All suppliers must make Seven Technologies Group aware of any conflicts of interest relating to your work with us as soon as they are known. Seven Technologies Group's staff are similarly expected not to allow conflicts of interest, therefore suppliers should make every effort not to place our staff in a conflicted or compromised position.

3.7 Trade Controls

Suppliers must comply with their obligations under all applicable import and export control legislation, including obtaining necessary licences and permits in time to allow timely delivery of goods and services. Suppliers will provide sufficient information regarding their products and services to allow Seven Technologies Group to manage its own trade control obligations.

3.8 Competition and Anti-Trust

Suppliers must follow the principles of open and fair competition and must not engage in price-fixing, market co-ordination or other anti-competitive activities.

Your attention is drawn to the UK Competition Act 1998 and Enterprise Act 2002, along with any equivalent overseas legislation.

3.9 Data Protection

Protection of personal data must be embedded in the way our suppliers do business. Seven Technologies Group will protect our suppliers' personal data in accordance with the EU General Data Protection Regulations; we expect a reciprocal commitment from our suppliers.

4 Environmental Matters

4.1 Health, Safety and the Environment (HSE)

Suppliers are expected to manage their impact on the environment and to safeguard against health and safety risks. This includes making proper provision for the health, safety and welfare of their employees and keeping records of all HSE incidents.

Suppliers are also expected to implement an HSE management system and are encouraged to consider certification to ISO:14001 and OHSAS:18001.

4.2 Corporate Social Responsibility and Sustainability

The impact of your business on your local area and society should be considered carefully. We aim to promote long-term relationships with our suppliers, therefore you are encouraged to ensure that your operations are commercially and socially sustainable and contribute positively to society.



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5 Supplier Commitments

5.1 Communication

Suppliers have a responsibility to make this document available to its employees and are strongly encouraged to implement equivalent codes of conduct and related policies.

5.2 Adherence

Suppliers are expected to conform to the principles set out in this code of conduct and are encouraged to flow equivalent principles out to their own suppliers.

Where the code of conduct is called up in a supplier contract, Seven Technologies Group may consider failure to meet the requirements of this document a material breach of contract.

5.3 Ethical concerns

Suppliers are strongly encouraged to raise any ethical concerns to Seven Technologies Group using the contact details contained within this document. We commit to dealing openly and fairly with any supplier who raises an issue in good faith in order to resolve their concerns.

Email: enquiries@seventechgroup.com

Tel: 01132 395350 (if directed to switchboard, please ask to speak to the Commercial Manager)

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