

# Supplier Code

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## ***Policy Statement***

Mutual trust and confidence between Pullman and its Suppliers is integral to the way in which we do business. We are committed to conducting business in a lawful and ethical manner and therefore look to all our Suppliers for this same commitment, along with an alignment to our core values of Excellence, Integrity, Proactivity, Passion, Togetherness and Trust.

This Supplier Code provides the basis of this - a clear values-based framework in which Pullman will operate and that, in return, we expect our Suppliers and their contractors to operate. But this is just a minimum, a framework, we look to all our Suppliers to exceed this and demonstrate to us their Excellence.

## ***Objectives***

To set out a clear framework and set of minimum standards against which Pullman and its Suppliers shall operate.

## ***Scope***

This Supplier Code applies to:

All Suppliers to Pullman regardless of geography, Company formation or way in which they are engaged by Pullman.

And

All Pullman employees, including temporary, fixed-term, casual workers, contractors / sub-contractors, consultants, interns or agency workers within Pullman (collectively referred to as 'employees' in this policy).

## ***The Supplier Code Principles***

Pullman will.

- be transparent, professional and confidential in the selection processes that we apply, conducting all business relationships with respect, honesty and integrity
- provide a trusted and open environment in which our suppliers feel able to share and communicate best practices and ways of transacting more effectively with us
- treat all suppliers with respect and fairness at all stages of the procurement lifecycle, whether in tender, negotiation or supply
- operate zero tolerance to bribery, corruption and coercion
- treat all stakeholders fairly and impartially, without discrimination or favour actively support and promote corporate social responsibility (CSR)
- avoid any business practices which might bring the procurement profession into disrepute.

- use procurement strategies to drive unethical practices from the supply chain
- ensure procurement decisions minimise any negative impact on human rights and the environment whilst endeavouring to maximise value and service levels
- put ethical policies and procedures in place and ensure compliance
- educate all staff involved in sourcing, supplier selection and supplier management to professional standards
- practise due diligence in business undertakings
- foster a culture of leadership by example ● take steps to prevent, report and remedy unethical practices
- provide a safe environment for the reporting of unethical practices
- abide by the Company Code of Ethics, Bribery, Gifts and Entertainment and Conflicts of Interests and Personal Ties policies upon which the Supplier Code is built

In return, we expect that all of our Suppliers abide by the following Supplier Code.

***In doing business:***

- be transparent, professional and confidential in all business transactions and business relationships
- communicate freely and in confidence with Pullman, sharing Best Practices or ways in which we could transact more effectively together
- not use, transact or exchange any Pullman employee personal or Company sensitive data without the prior contractual approval by Pullman
- operate zero tolerance to bribery, corruption and coercion and not attempt, in any form, to bribe or corrupt any Pullman Employee
- avoid any business practices which might bring the industry in which you operate into disrepute.
- foster a culture of leadership by example
- take steps to prevent, report and remedy unethical practices
- provide a safe environment for the reporting of unethical practices

In the treatment of employees:

- establish recognised employment relationships with their employees
- have a policy of equality for all in the workplace with no discrimination on the basis of race, religion, nationality, age, gender, marital status, sexual orientation, disability, union membership or political affiliation
- not abuse or intimidate its employees in any fashion
- ensure that any disciplinary measures are recorded
- have a clear and easy to understand grievance/appeal process
- ensure employees are:

- o free to choose to work for their employer (the supplier)
- o free to leave the supplier after reasonable notice is served
- not use forced, bonded, non-voluntary or imprisoned labour
- provide all employees with an easy to read contract of employment with particular clarity in relation to wage levels and their legal/contractual rights
- not prevent or discourage employees from joining trade unions
- not make deductions from wages unless permitted by law or with the permission of the employee
- comply with all national laws or industry standards, including Modern Slavery Act and National Living Wage.
- uphold the freedom of employees to join workers associations, the right to collective bargaining, the elimination of all forms of enforced, compulsory and child labour and the elimination of discrimination

### ***In caring for the Environment and delivering a sustainable supply chain:***

- assign responsibility for Sustainability to a senior management representative
- have an appropriate sustainability policy in place for your business
- actively support and promote corporate social responsibility (CSR)
- demonstrably work to minimise the impact of your business on the environment
- actively engage with Pullman to help us meet our sustainability goals and targets

### ***In Health and Safety:***

- assign responsibility for Health and Safety to a senior management representative
- have safety targets in place that drive continuous improvement
- have regular health & safety reviews that scrutinise accidents and causation
- have demonstrable Health & Safety plans in place
- have appropriate Health and Safety policies in place and monitor compliance to those policies
- ensure that employees are trained in Health and Safety
- provide employees with the necessary health and safety equipment ● ensure that working conditions are healthy and hygienic
- have regular breaks and have access to suitable water for drinking and washing
- abide by the Pullman Health & Safety Policy and Rules when visiting any Pullman location and throughout the duration of that visit.

## ***Breach of Policy***

Breaches of any aspect of this policy may be subject to an immediate termination to trading with any given supplier identified as non-compliant.

Where illegal activity occurs, the Company reserves the right to notify the police.

## ***Responsibilities***

### **Managers Must:**

- Read, understand and follow the principles of this document and any associated document(s);
- Keep up to date with changes to this document and any associated document(s)
- Seek guidance from Pullman Procurement as appropriate;
- Address any breach / suspected breach of this policy, fairly and consistently.

### **Suppliers and Employees Must:**

- Read, understand and follow the principles of this document and any associated document(s);
- Seek clarification on any points which are unclear.
- Report any breach/suspected breach of this policy, immediately to the Pullman Procurement Function.

## ***Associated Documents***

- Code of Ethics
- Bribery, Gifts and Entertainment Policy
- Conflicts of Interests and Personal Ties Policy

Note that the above are Pullman policies for Employees and as such will not be published outside of the Company.