

SUPPLY CHAIN CODE OF CONDUCT

Queen's University Belfast is committed to carrying out procurement activities in an environmentally, socially, ethically and economically responsible manner and to enter into agreements and contracts with suppliers that share and adhere to its vision. The Supply Chain Code of Conduct sets out the values and principles expected of suppliers. Those engaged on University work, whether as suppliers or sub-contractors, are expected to comply with the Code as well as the standards of their own professional bodies. Suppliers will be asked to acknowledge their compliance with the values and principles of the Code, and it is expected they will adopt requirements contained in this Code in their own organisation and flow these requirements down to their supply chain. Where local regulation, law or policy require stricter requirements than detailed in Queen's University Belfast's Code of Conduct, suppliers must adhere to such requirements.

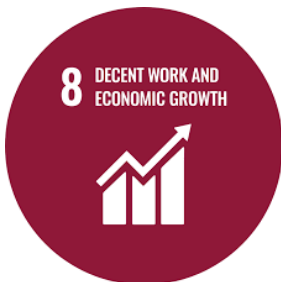
Queen's is committed to working with suppliers to improve sustainable practices and support the integration of sustainability initiatives into procurement policies, processes and supply chains. As such, Queen's requires suppliers with contracts spanning more than one year to complete a self-assessment re-affirming their compliance with the Code of Conduct on an annual basis. Where shortcomings are identified in supplier compliance with the Code of Conduct, suppliers should strive to implement a time bound programme of improvement (remediation), to ensure conformance.

Queen's University has set out an ambitious target of Net Zero by 2040 (detailed in the [Net Zero Plan](#)) to address the climate crisis and is committed to playing its part in the transition to a carbon neutral society, with suppliers having a key role to play in this decarbonisation journey. The University is committed to supporting the United Nations Sustainable Development Goals (SDGs) which aim to solve global challenges and achieve a more sustainable, equitable future for all.

Queen's University is committed to supporting Small Medium Enterprises (SME's) on their sustainability journey and understand that different organisations are at different stages of this process. SME suppliers are encouraged to utilise the free tools available to develop their own sustainability action plan and targets.

SOCIAL COMPLIANCE

Not use forced, involuntary or underage labour



Suppliers shall:

- Ensure employees are free to choose their employment and leave that employment without hold by financial deposit or personal items.
- Ensure forced, bonded or involuntary prison labour shall not be used.
- Support the effective abolition of child labour.
- 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.
- Provide support for any child found to be engaged in or performing child labour 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.
- Confirm that it has not been convicted of any slavery or human trafficking offenses anywhere around the world.

- Confirm that to the best of its knowledge it is not currently under investigation, inquiry or enforcement proceedings in relation to any allegation of slavery or human trafficking offenses anywhere around the world.
- Make reasonable enquiries to ensure that its officers, employees and sub-contractors have not been convicted of slavery or human trafficking offenses anywhere around the world.
- Not use, nor allow its employees or sub-contractors to use physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation, on its employees or sub-contractors.
- Respect and support the protection of internationally proclaimed Human Rights such as the United Nations Global Compact (UNGC), and ensure they are not complicit in human right abuses, as outlined in the UN Guiding Principles on Business and Human Rights (UNGP).
- Implement a robust whistleblower policy, that allows workers to report concerns relating to labour practices anonymously and without fear of retaliation. This policy must be communicated clearly to all workers and include a mechanism for independent review of complaints.
- Comply with the UK Modern Slavery Act 2015 and become familiar with the University's Modern Slavery Statement (found on the Queen's website homepage) and the Whistleblowing process contained within it.

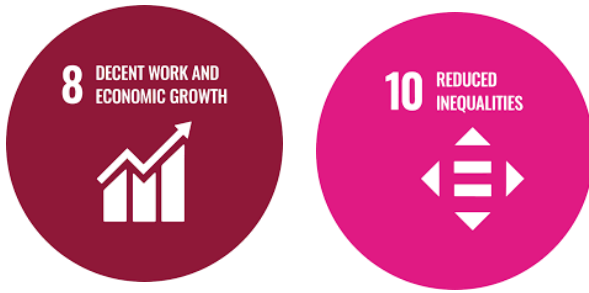
Provide suitable working conditions and terms



Suppliers shall ensure that:

- All wages and benefits paid for a standard working week meet, as a minimum, national legal standards in the country of employment. Wages and benefits should be paid without discrimination to all workers and all non-statutory deductions should be reasonable and with the consent of the worker. Queen's is an accredited Living Wage Employer. Where applicable, suppliers shall pay contracted staff the Real Living Wage.
- Working hours are not excessive (not over 48 hours per week, excluding overtime) and allow for at least 1 day off for each 7-day period on average. Working beyond this should be non-regular and of employees' own will.
- Working hours that exceed 60 hours in any 7-day period do so only in exceptional circumstances and where all of the following are met:
 - ✓ it is allowed by national law;
 - ✓ it is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - ✓ appropriate safeguards are taken to protect the workers' health and safety; and
 - ✓ the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- A safe and hygienic working environment is provided, including any catering or accommodation areas. Any [hazardous working](#), as defined by the International Labour Organisation (ILO), should only be carried out by persons aged 18 years or over.
- All equipment is safe for use and processes allow a safe working environment. Workers should receive training (which should be mandatory to attend and be in a language they can understand) in safe operation of all equipment and tools, which should be provided ongoing as frequently as required to remain effective.
- They endeavour to eliminate (in the first instance) or reduce the threat to worker health from all hazards, including any hazardous chemical agents used in manufacturing and/or supply chain activities and provide mandatory training (in a language they can understand) in the safe use of any harmful chemicals.
- All personal protective equipment necessary to ensure the health and safety of workers carrying out the tasks is provided free of charge by the employer.
- Policies and processes are in place for recording and eliminating occurrence/reoccurrence of health and safety related incidents and should have regard for avoiding the cause of any mental health issues affecting workers.

Treat employees fairly



Suppliers shall:

- Allow employees 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 organisation.
- Comply with the University's [Equality and Diversity Policy](#).
- Remunerate all employees equally at the same employment grade, regardless of education, social class/caste, nationality, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation unless statutory conditions require otherwise.
- Ensure effective worker engagement practises are in place ensuring all workers are clear of their duties and their employment rights under local and international laws.
- Ensure 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.
- Facilitate inclusive practices and promote diversity both within its own operations and within its supply chain. Such activities may include promoting gender balance, sourcing from minority owned subcontractors and providing provisions and reasonable adjustments for disabled employees.

ETHICAL COMPLIANCE



Suppliers shall:

- Act in compliance with all laws and regulations of the countries they are working in, manufacturing in or trading with, as applicable, and adhere to international standards where applicable such as the UN Global Compact, the OECD Guidelines for Multinational Enterprises.
- Not be involved with acts of corruption or bribery, or support acts of violence or terrorism or abuse of individual people or communities. The University holds a zero-tolerance policy for bribery and corruption, and suppliers are expected to comply with the University's [Bribery Act Policy](#) and the UK Bribery Act 2010.
- Not be involved in or offer improper payments such as kickbacks or facilitation payments to the University or University employee.
- Actively promote fair trade practices and ensure that producers receive fair compensation. Where applicable, suppliers are encouraged to seek certifications from recognised fair-trade organisations such as Fairtrade International.
- Act with respect and integrity at all times.
- Have undertaken due diligence of their supply chains and impacts caused by their activities and actively seek out ways in which to minimise negative impacts.

ECONOMIC DEVELOPMENT



Suppliers shall:

- Not impose unnecessary or unfair contract terms on their suppliers, or throughout their supply chain.
- Comply with all financial regulations and taxations of the countries they are working in, manufacturing in or trading with, as applicable.
- Appoint sub-contractors through an open and fair process such as public advertising of such opportunities wherever possible and subject to the terms of the procurement process (if applicable).
- Ensure risk is allocated to the party best placed to manage it. This means not flowing risk inappropriately down to sub-contractors and not asserting that sub-contractors can manage risk that is in fact better managed by the supplier.
- Ensure payments to their supply chain are made in accordance with The Late Payment of Commercial Debts (Interest) Act 1998 and associated regulations (including, but not limited to, the Late Payment of Commercial Debts Regulations 2013) and, where relevant, the Procurement Act 2023.
- In line with the University's commitment to enhance economic growth and prosperity in the local economy, suppliers are encouraged to seek out similar opportunities within their local communities.
- Ensure business operations do not harm the local community in which these operations take place or where the delivery of the contract takes place, and appropriately address any concerns or requests from those communities.
- Take reasonable steps to include community benefit delivery in the locality of where the contract is performed (including, for example, publishing and delivering levels of local training and employment opportunities).

ENVIRONMENTAL COMPLIANCE



Suppliers shall:

- Work towards developing complete, consistent, and accurate Scope 1, 2 and 3 carbon emissions data which is in line with industry standards such as ISO 50001. Suppliers should seek to set ambitious targets to reduce their carbon emissions over time and collaborate with the University and industry peers on carbon reduction initiatives.
- Actively develop a sustainability action plan that includes Net Zero actions (including Scope 1, 2, and 3 emissions), with targets and meaningful initiatives to minimise their environmental impact and address the Global Climate Crisis. Suppliers should be prepared to share such plans and targets publicly.
- Measure and monitor environmental impacts, and ensure measures are in place to effectively reduce identified environmental impacts (e.g. recycling, single use packaging, general plastic usage, waste and water management, pollution levels and energy efficiency measures).

- Mitigate against and avoid, if possible, causing environmental damage and/or negative environmental impact through the manufacturing and supply of the goods or services and disposal of supply chain waste.
- Identify opportunities to develop/innovate eco-designed products/service solutions, embedding circular economy design principles into manufacturing, product use and disposal. Suppliers are encouraged to adopt cradle-to-cradle design principles (where applicable). Suppliers must seek to reduce their use of raw materials within manufacturing processes and should ensure material transparency and traceability within its own supply chain.
- Promote the development of and use environmentally friendly innovative technologies (where appropriate), processes and products, with the goal of becoming a net zero supplier, that is resilient to climate change related risks.
- Measure, manage and address energy usage in own operations and in products created, keep energy consumption to the lowest feasible levels, and seek to use renewable energy sources wherever possible.
- Endeavor to prevent pollution or pollution incidents by conservation measures in their facilities and processes, by recycling, reducing and substituting harmful materials. Suppliers will ensure all waste is disposed of in an environmentally responsible manner, in line with local and internal regulations.
- Take every opportunity to preserve biodiversity within their and their own supply chains operational control. Proactively avoid negative impact on biodiversity and minimize this where unavoidable.
- Meet the applicable [Government Buying Standards](#) for the relevant category to which the contract applies.
- Conduct their business in accordance with local and national environmental laws, regulations, and directives of the countries they are working in, manufacturing in or trading with, as applicable and adhere to the University's [Environmental Policy Statement](#).

DATA PROTECTION AND INFORMATION SECURITY



Suppliers shall:

- Comply with all applicable data protection laws and be able to demonstrate compliance on request.
- Have an information security management approach, where relevant, that can either be demonstrated with evidence, on request, to Queen's and is aligned to the relevant audited framework, such as ISO 27001, Cyber Essentials Plus, NIST SP 800-53, PCI-DSS.
- Consider information security risks associated with the provision of goods and services and mitigate/reduce risk where possible.
- Provide details of a nominated contact for data protection/information management matters.
- Promptly inform the University of any and all information security incidents and/or data breaches which involve Queen's data or are relevant to the security of Queen's data.

MONITORING AND REVIEW

Suppliers shall:

- Be prepared to provide proof of compliance with all applicable labour, health and safety, environmental laws and working conditions at any time (or request independent verification of compliance through a third-party audit).
- Collaborate with Electronics Watch if requested to do so by disclosing supplier and supply chain compliance data to the

fullest extent possible and take effective action to remedy labour rights and safety breaches in supply chains. The University is an affiliate member of [Electronics Watch](#) and committed to compliance with labour and safety standards in its electronics supply chains through an on-the-ground monitoring network now spanning major electronics production regions worldwide.

- Report any instances, of illegal or unethical behaviour or breaches of this Code in relation to the goods, services or works being provided to the Procurement Office procurement@qub.ac.uk without delay along with the action plan to put right the situation.
- Use, where applicable, the [University's Whistleblowing](#) process and/or the confidential [Modern Slavery Helpline](#) on 08000 121 700.

RESOURCES

The [Home Office Guidance](#) on Transparency in Supply Chains provides helpful guidance regarding the matters in this code and Annex G - useful information and resources is particularly helpful to give wider context and guidance on these important matters. The [SME Climate Hub](#) may be of use to suppliers starting the journey to net zero.