

Code of Conduct for Suppliers

Version 1 | June 2019

1. Policy statement

NewRiver is committed to enhancing the lives of the people we serve and minimising our impact on the environment. We conduct our activities according to our strict ethical values and expect that our suppliers follow the same principles. The term “supplier” refers to advisers, service providers, contractors, consultants and agents. This code of conduct outlines the social, environmental and ethical standards that our suppliers must follow in order to do business with us.

2. Standards

2.1 Legal requirements

It is expected that all partners comply with all applicable laws and regulations. This includes but is not limited to the following legislation, principles and standards:

- United Nations Global Compact
- The UN Universal Declaration of Human Rights
- 1998 International Labour Organisation Declaration on Fundamental Principles at Work
- UK Modern Slavery Act 2015
- Bribery Act 2010
- Equality Act 2010
- Health and Safety at Work etc Act 1974

2.2 Environmental process standards

All suppliers shall strive to minimise any negative environmental impacts from products used within the organisation and seek to reduce usage, reuse and recycle material wherever practical. Waste should be processed, stored and disposed of in a manner which avoids environmental damage. Suppliers shall strive to prevent pollution and reduce their environmental impact by identifying and implementing improvement initiatives.

2.3 Environmental product standards

All suppliers shall ensure that goods and services that are procured on behalf of NewRiver have a minimal impact on the environment. Suppliers shall strive to procure products that are certified by the Global Ecolabelling Network where financially practical.

2.4 Business ethics

We expect our suppliers to take a zero-tolerance approach to bribery and corruption and act professionally, fairly and with integrity in business dealing and relationships. Suppliers shall develop and implement policies to promote sustainable practices across their organisation and develop initiatives that support and contribute to the social and economic wellbeing of the communities they operate in.

2.5 Labour practices

All suppliers must conform to our Modern Slavery Act Supplier Policy. Suppliers shall not employ children under the age of 15 and make no use of forced or compulsory labour. Suppliers shall not discriminate employment on the grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, pregnancy and maternity, religion or belief, disability or age. Working hours, wages and benefits are expected to follow the UK employment law.

2.6 Safety, health and wellbeing

We expect that our suppliers comply with applicable health and safety regulations and provides a work environment that is safe and supports employee health and wellbeing. Work environments should be free from harassment and bullying and all employees should be treated, and treat others, with dignity and respect.

3. Supplier onboarding and compliance

3.1 Supplier engagement programme

Before engaging a supplier NewRiver will complete the applicable internal company due diligence, contracting and approvals procedures. The supplier will be required to provide NewRiver with the information necessary to allow satisfactory completion of these internal procedures.

3.2 Communication

Suppliers are expected to communicate the standards stated in this Code to their subcontractors and business partners. Suppliers are expected to provide training and other measures used to ensure the policies and procedures are applied.

3.3 Monitoring

Suppliers shall report any concerns about compliance with legal requirements or any aspect of this Code at the earliest possible stage. Suppliers shall co-operate with NewRiver to allow us or an authorised third party to conduct audits to verify compliance with these standards.

3.4 Compliance

Suppliers must ensure that they read, understand and comply with this Code.

NewRiver reserves the right to terminate our relationship with any individuals and/or organisations working on our behalf if they breach any applicable law. NewRiver further expects suppliers to ensure their operations comply with all standards outlined in this Code.