

# Wales & West Utilities Supply Chain Charter

We are committed to being a sustainable business and our Supply Chain Charter sets out how our approach to responsible procurement will support that vision.

Through our Supply Chain Charter, we are sharing our aspirations and outlining our commitment to how we - with the support of our supply chain - will contribute positively to the society and environments in which we operate.

We expect our suppliers to adopt the principles in this document and to hold their conduct to the highest ethical standards, maintaining compliance with all relevant legislation.



## People

We believe providing decent work for all is a cornerstone for economic growth.

**Diversity & Inclusion:** All of our suppliers must ensure that no employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the protected characteristics as defined by Equality Act 2010).

**Living Wage:** We are a living wage accredited company. Paying a good wage not only helps the people who work for us but makes good business sense too. All contracted or subcontracted employees working on WWU sites must also earn at least the living wage.

**Modern Slavery:** We requires our contractors and suppliers to comply with the Modern Slavery Act 2015 ('the Act'), and will not continue to purchase goods or services from any supplier that is found to be engaging in human trafficking or using slave labour.

## Safety

All our contractors and suppliers must have in place effective health and safety management systems, appropriate for the nature and scale of their business and the goods, works or services they provide.

## Environment

We are an environmentally ambitious company, delivering best practice, leading environmental innovation to society and to protect and enhance the environment. We expect all our suppliers to support us and actively work with us to make sure that:

- products and services are designed to minimise environmental impacts and maximise energy efficiency, considering whole life costs across the value chain;
- use of natural capital resources are reduced wherever possible (for example, plants, air, water, soil and minerals). In the future we want to have a positive impact on natural capital and expect our suppliers to support us achieve that ambition;
- All wastes are disposed of legally and wherever possible re-used, re-purposed or recycled rather than landfilled;
- We encourage all our suppliers to:
  - monitor their Green House Gas emissions (or carbon emission (CO<sub>2</sub>e)) in line with international best practice.
  - set carbon emission reduction targets.
  - take action to reduce their carbon emission (CO<sub>2</sub>e).
  - engage with subcontractors to drive reduction on GHG emissions within their supplier chain.

## Data

WWU is a Critical National Infrastructure (CNI) company.

**Cyber Security:** We expect that suppliers to WWU have established information security policies and procedures in place, including:

- regular information security and data protection training for all staff;
- e.g. patching, network security, testing;
- Having implemented physical security controls, e.g. barriers and fences, access control, monitoring, CCTV etc;
- Conducting pre-employment background checks/ vetting on new employees;
- Having implemented risk management protocols, e.g. internal audits, penetration testing, risk audits;
- Having implemented IT security controls.

**Data Protection:** Data should be protected fully in compliance with all relevant data protection legislation including the General Data Protection Regulations or equivalent provisions.

**Reporting and Compliance:** Suppliers must report any issues of compliance with this charter to us as soon as practical. We expect supplier to adhere to any contractual or regulatory timelines where relevant to communicate corrective actions on reported breaches. Where this is not applicable, we expect that within one working month of the reported breach the supplier will provide to us a corrective action plan they will take with appropriate timelines. Failure to comply with these timelines will be a breach of this charter.

Suppliers must confirm that they have read and understood the WWU Supplier Charter. In doing so, suppliers acknowledge the requirements placed upon them and agree to have a good management and governance process in place to make sure the requirements of the charter can be demonstrated. Additionally, suppliers should take reasonable steps to cascade the aims and requirements of the Charter through their supply chains.

## Commercial

**Business Ethics:** We expect the highest standards of ethical conduct from all within our supply chain. Suppliers must comply with the law and not engage in corruption, extortion, or bribery to obtain an unfair or improper advantage.

### Tax Evasion

We have a zero-tolerance approach to tax evasion. We expect suppliers to comply with the law, as set out in the Criminal Finances Act 2017, not to engage in or facilitate tax evasion and to have reasonable prevention procedures in place.

**Procurement Principles:** We follow and adhere to the following Procurement Principles, namely, Non-Discrimination, Transparency, Mutual Recognition, Proportionality and Equal Treatment.

**Sub-Contracting:** Subcontracting or work is permitted where:

- it is compliant with CDM regulations;
- there is prior written approval for contractors with transparent support locations;
- subcontractors and third parties are informed, agree and adhere to the provisions of this Supply Chain Charter and relevant agreements;
- where risk assessments have been agreed;
- under agreement that you are responsible for any and all acts of any subcontractor or third parties;
- evidence upon request that the above is taking place is provided.