

# Supplier Charter

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## Introduction

Wales & West Utilities (WWU) customers and communities rely on us to deliver a safe and reliable gas supply to their homes and businesses every day. We are committed to being a sustainable business and our Supplier Charter sets out how our approach to responsible procurement will support that vision, sharing our expectations of how we, with the support of our supply partners will contribute positively to the society and environments in which we operate.

We are determined to protect our reputation as a reputable business, and meet our obligations as set out by our regulator Ofgem. In support of our ambitions, supply agreements will continue to promote our Business Priorities and Values, defining how our activities enable us to meet our sustainability objectives.

As a supply partner you play an important part in helping us to keep the energy flowing. Our relationship is crucial for delivering our business plan and driving our business forward. This Supplier Charter outlines our expectations for how our partners and their associated supply chains should act when providing goods or services. We expect all suppliers to adhere to the highest ethical standards, operate with integrity and comply with all relevant laws, regulations, and licenses.



**Brent Harkins**

**Head of Procurement and Operational Support**

## Our Priorities & Values

We work in a fast paced, challenging and ever-evolving industry. We understand that if we are to thrive as a business, we need to meet today’s challenges and get ready for tomorrow. So, it is important we work as one team on behalf of our customers – demanding the very best standards, every day. Our company priorities and values play a central role in helping us achieve just that; they guide our key business decisions and are reflected in our day-to-day work.

Our priorities				
<p><b>Demanding safety always</b></p> <p>We never compromise on the safety, wellbeing and health of our colleagues and customers, always raising the bar and improving standards.</p>	<p><b>Driving outstanding service</b></p> <p>We strive to exceed customer expectations by offering fair, inclusive, quality services for all, whilst looking after those most in need.</p>	<p><b>Delivering value for money</b></p> <p>We always spend and invest money wisely; working smarter to offer affordable, value for money services.</p>	<p><b>Doing all we can to provide sustainable energy</b></p> <p>We’re future proofing to deliver reliable, greener energy for heat, power and transport, and reducing our environmental impact to achieve net zero targets.</p>	<p><b>Designing our future</b></p> <p>We’re building a skilled, resilient, and diverse team to work in partnership with our stakeholders. Together, helping our communities and society thrive.</p>
Our values				
<p><b>We put customers first</b></p> <p>We build trust by giving excellent service, listening and taking action on what our customers tell us.</p>	<p><b>We take pride</b></p> <p>We take ownership and are accountable for our work, going above and beyond to get great results.</p>	<p><b>We work as a team</b></p> <p>We build relationships with colleagues and partners, share best practice and encourage honest, open conversations.</p>	<p><b>We bring energy</b></p> <p>We approach all our work with enthusiasm, always challenging outcomes to do better by embracing new ideas and innovative solutions.</p>	

## Health and Safety

Demanding safety always is a key priority for our business. We never compromise on the wellbeing and health of our colleagues, customers or partners, and continuously strive to improve standards. We are proud to provide a range of gas connection services, during the delivery of which we have consistently received the RoSPA Gold Standard for safety. To ensure we always operate in a safe manner, our supply partners must comply with relevant legislation, promote a safe working environment, and continuously improve their Health and Safety Management systems, appropriate to the scale and activities undertaken. These systems should extend to the control of their own supply chain partners and sub-contractors. Where appropriate, an activity should comply fully with the Construction (Design and Management) Regulations 2015.

## Data Protection

Data Protection is critical to us as an organisation. Protecting the confidentiality and integrity of our colleagues' and customers' Personal Data is a responsibility that we always take seriously. We require suppliers to only process personal data in accordance with our express written instructions, the UK GDPR, and the Data Protection Act 2018. This includes having appropriate technical and organisational security measures in place to protect personal data, not processing personal data outside the EU without our prior written approval, seeking authorisation before engaging sub-processors, notifying WWU of any potential data breaches without undue delay, assisting WWU in the investigation of data breaches, ensuring all staff and sub-processors have received suitable and regular Data Protection training and embedding Privacy by Design and Default principles from the conception of any solution/product/service/process provided to WWU.

## Environmental Protection

We recognise that most of the gas transported to our customers is a fossil fuel and that our operations have direct and indirect impacts on the environment. As an ambitious company delivering best practice, we strive to lead environmental innovation and protection. We support the commitment of the UK and Welsh governments to reaching net zero and believe the investments we are making in reducing emissions and decarbonating heat, power and transport can help deliver a net zero energy system.

We will go further than doing 'no environmental harm' and instead aim to deliver environmental net gain. We will enhance the communities in which we work and contribute to the wellbeing of our customers. This will complement our ongoing commitment to supporting customers beyond our core responsibilities and reflects the central role we envisage for the gas network in a net zero energy system. We aim to move towards a state where sustainability considerations are so well integrated into our business processes and supply chains that they become our Business as Usual.

Collaboration from our supply base will be critical to our objectives being achieved so the ability for suppliers to actively contribute will be an important factor in future awards.

WWU has published a Sustainability Strategy, which you can find on our website at [www.wwutilities.co.uk/about-us/publications](http://www.wwutilities.co.uk/about-us/publications). This translates the big idea of sustainability into the actions we will be taking for our customers and communities. We needed a long-term view that transcends our usual business planning cycles. The strategy identifies key targets which align to our business priorities, the 'UN Sustainable Development Goals' and the expectations of the 'Well-being of Future Generations (Wales) Act 2015', to ensure that we consider sustainability in its entirety. This publication should be a useful resource for supply partners wishing to gain an understanding of what working with us will look like in future.

## Ethical Business and Social Responsibility

As an accredited Real Living Wage employer, we ensure that all our staff, whether directly employed or permanently engaged on our premises, earn at least the Real Living Wage. This minimum standard considers a wide range of metrics, from food, retail, and housing, to determine the real cost of living and is adjusted annually. We are confident of the security that the standard provides to employees, particularly in recent times of unprecedented inflation, and the tangible benefits to people's lives that are delivered by a wage which properly reflects the cost of living in today's world. The standard is also shown to offer real benefits to employers which include improved employee satisfaction and therefore productivity, reductions to both training and recruitment costs, as well as increased people retention. We encourage all our suppliers to become Living Wage employers and in turn, to promote the standard throughout their business.

Conducting business with integrity is crucial if we are to remain trusted by our customers, colleagues, and shareholders. Acting in an ethical and consistent manner in everything we do, means always operating within a strong set of moral values and following applicable policies and procedures. Suppliers are expected to uphold these standards, promote an inclusive culture, and address any unethical behaviour promptly.

Our policies are proportionate to the risks we face along with the nature, scale, and complexity of our activities. The highest standards are expected from everyone within our business, including our supply partners. Suppliers must adhere to our rules on business rewards, such as gifts, by adhering to the Bribery Act 2010. If you find that any potentially corrupt practice has taken place, and this relates to work done on our behalf or otherwise relates to our business, you should contact us via the whistleblowing process noted at the bottom of this document.

## Security, Resilience and Continuity

WWU is part of the UK Critical National Infrastructure (CNI) and is designated as an Operator of Essential Services (OES) by the Government. As such, WWU falls under the scope of the Network and Information Systems (NIS) Regulations 2018. The NIS Regulations require that WWU operates and maintains high standards of cyber security, and this extends to our supply chain partners. Suppliers of goods and services to WWU therefore have a key responsibility for helping us to maintain the confidentiality, integrity and availability of our information, data and systems and are required to have appropriate information security policies and procedures in place, together with appropriate business continuity plans and procedures. Additionally, WWU has defined formal cyber security principles that will apply to certain types of projects and engagements. Further details about this will be provided through the procurement process and individual contracts. WWU adheres to all National Protective Security Authority (NPSA) requirements subject to site classification and assesses itself under the Cyber Assessment Framework (CAF) (Objective E).

Our suppliers must have appropriate business continuity arrangements to ensure that service is maintained during disruptions. Assessments should be undertaken to identify threats and their impacts so that mitigation can be applied. These arrangements should consider people, premises, processes and providers to deliver regular assessments of emerging risks.

## Human Rights and Modern Slavery Prevention

Supply partners must respect their employees and provide a safe workplace free from harm, intimidation, and discrimination. Recent amendments to the Equality Act 2010 require employers to assume a greater responsibility for worker protection, specifically around the prevention of sexual harassment. We have taken measures to ensure that all staff are aware of their responsibilities and operate a zero-tolerance policy for any form of harassment or bullying in the workplace, this policy extends to our supply partners working directly with WWU personnel.

Our requirements align to the core standards of the International Labour Organisation (ILO), where overarching expectations include the freedom of association and the effective recognition of the right to collective bargaining, the removal of all forms of forced or compulsory labour, the effective elimination of child labour and of discrimination in respect of employment and occupation. Suppliers should adhere to the UN Global Compact Principles, and local employment legislation. We promote equal opportunities and expect suppliers to do the same.

As active members of the Slave Free Alliance (SFA), a cross-industry group consisting of more than one hundred and twenty UK businesses, we aim to raise awareness and build resilience to the risks of Modern Slavery. Through this activity we contribute to the Utilities Against Slavery (UAS) working group. The UAS aims to develop utility sector collaboration, while building skills and shared resources to support SFA objectives. WWU aims to exceed the requirements of the Modern Slavery Act 2015, with a group drawn from across our business working to develop action plans and strategies which strengthen our knowledge and systems while ensuring support at the highest level. All activity is published annually through a Modern Slavery statement. Organisations meeting certain criteria are strongly encouraged to publish their statements on the UK Government's Modern Slavery Statement Registry. We undertake to build a clear picture of anti-slavery knowledge and activities within our supply chains and develop learning pathways to assist the creation of a resilient supply base. Anyone knowing of or suspecting activity which breaches our policies can contact us anonymously and in confidence via the whistleblowing process noted at the end of this document.

## Pipeline – Where ideas flow

### Learning and Development

Building knowledge promotes development, encourages innovation and helps our supply partners to contribute equally. The Supply Chain Sustainability School (SCSS) is an extensive resource of learning material that improves awareness across topics relevant to the Utilities sector and supporting industries. SCSS enables the creation of bespoke learning pathways to grow internal and partner knowledge, ensuring that minimum standards are in place to support activities. Where relevant, we expect these pathways will become an integral part of our future supply agreements. For an SME, the school provides professional support to help a business grow staff awareness, particularly useful in understanding the themes that will become part of business as usual in future, such as net zero.



### Single Use Plastics

The existing legislation on single use plastics (SUP) only covers a limited scope. At WWU we are mapping all SUP within our supply chains to determine whether environmentally beneficial alternatives can support our sustainability ambitions. We are investigating the materials used in the manufacture, packaging and delivery of goods and services to understand where we can reduce our dependence on plastics to positively impact waste and recycling.

### Carbon Management

Our stakeholders require an increasing level of information around carbon impacts and see measurement within our supply chains is a key enabler of environmental improvement. A clear picture of embodied and operational emissions will inform carbon reduction plans and shape future product specifications to support our environmental ambitions. The ability for suppliers to track and report emissions accurately will become more important over the coming years and should be considered an urgent development opportunity. The detail and scope of data will be dependent on the nature of the goods or services supplied, but regular carbon reporting will become a key insight.

## WWU Supplier Expectations

Suppliers must evaluate their activities to ensure compliance with this Supplier Charter. They should have processes to remedy any breaches, non-compliance, or problems identified through audits, reviews, or inspections. We ask many of our suppliers for feedback annually on a range of topics including accreditations, insurance, carbon emissions and social impact.

It is important that we have consistent and reliable dialogue to ensure that performance and values are aligned and effectively managed. Where you are contacted by WWU, we appreciate a prompt and full response. Any changes to your contract management teams or contact information must be communicated to [procurementenquiries@wwutilities.co.uk](mailto:procurementenquiries@wwutilities.co.uk).

Please get in touch if you have any questions regarding this document or its content.

### **Anonymous whistleblowing process**

Freephone 0800 915 1571 at any time (24/7), or via Safecall's website:  
[www.safecall.co.uk/file-a-report/](http://www.safecall.co.uk/file-a-report/)