

# Supplier Code of Conduct

January 2024



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## 1. Introduction

Integrity is at the heart of our business and is a core component of Onecom’s company values by which all employees are expected to act with **Ambition, Innovation, and Integrity**, as well as be **Inspirational** and **Knowledgeable**. Consistent with our company culture, Onecom formed an Environmental Social and Governance (ESG) committee responsible for supporting our commitment to sustainable business practices, especially with regards to the ESG issues displayed in *Figure 1*. Onecom believes that it’s vital we ensure high standards and that protocols are set throughout our operations and within our business network to take account of our ESG responsibilities and ethical standards. For further details of our approach to ESG, please visit our website:

<https://www.onecom.co.uk/environmental-social-governance-policies>.

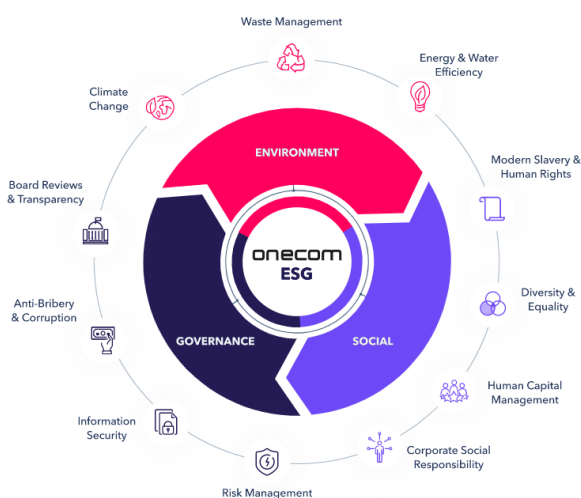


Figure 1. Onecom’s ESG Values.

This Code of Conduct (‘Code’) is applicable to all suppliers who provide goods or services to any entity within the Onecom Group. Onecom’s suppliers are also expected to be advocates of the principles of this Code in their own supply chains. Suppliers will operate within all applicable laws, rules and regulations and are expected to maintain their own policies and procedures to ensure compliance.

## 2. Guiding Principles

- We believe supplier relationships should be founded on respect, integrity, and trust.
- Our organisation and suppliers should act with integrity, complying with all applicable laws, rules, and regulations of our primary country of operation, the United Kingdom.
- We maintain a zero-tolerance approach to bribery in any form.
- We promote a workplace that is diverse and inclusive and will not tolerate any discrimination, bullying, harassment, or victimisation within Onecom or in connection with the provision of goods/services.
- We have zero tolerance towards modern slavery, forced labour, child labour and human trafficking in any form. Onecom’s *Modern Slavery Statement* can be found on our website: [www.onecom.co.uk](http://www.onecom.co.uk)

## 3. Responsible Business Principles

This Code explains how we put our principles and values into practice in order to ask the right questions, do the right thing, and to encourage the right behaviour. Our expectations of suppliers are grouped into six key areas:

1. **Environmental Management**
2. **Human Rights**
3. **Diversity and Inclusion**
4. **Health & Safety**
5. **Governance**
6. **Responsible Supply Chain Management**

## 4. Environmental Management

The depletion of finite natural resources, and the implications climate change has raised concerning the environment and biodiversity has led to sustainable options becoming increasingly important in influencing development choices and when reviewing operational investments / processes.

**We expect our suppliers / partners to:**

- Comply with all applicable environmental regulations.
- Conserve natural resources where possible and try to reduce energy and water consumption.
- Work to reduce both your direct and indirect carbon emissions.
- Adopt the reduce, reuse, and recycle approach wherever possible.
- Operate responsibly and ethically to ensure waste is safely handled, moved, stored, recycled, to prevent spills or releases into the environment.

## 5. Human Rights

As a responsible organisation, upholding ethical business practices that respect human rights is fundamental to our company culture and what we stand for.

**We expect our suppliers / partners to:**

- Respect the human rights of your employees.
- Ensure employees are free to make choices regarding their employment: there should be no illegal, forced, bonded, involuntary, or exploited labour.
- Ensure there are no forms of human trafficking or involuntary movement of people for exploitation.
- Ensure that no underage workers are neither directly nor indirectly employed.
- Pay wages which at least meet minimum national standards, with overtime being voluntary, used reasonably and compensated fairly.
- Respect the rights of your employees to associate freely, join or not join labour unions, seek representation, and join worker’s councils.
- Provide a work environment free of inhumane treatment, coercion or mental, physical, or verbal abuse.
- Apply these principles to any Onecom employees, contractors, workers, clients, or other stakeholders.

## 6. Diversity and Inclusion

As an organisation that strongly believes our people are our strongest asset; efforts are regularly conducted to ensure our teams feel valued, empowered, and know they're an integral part of the 'Onecom family'. Hence, we expect suppliers to present similar values.

### We expect our Suppliers / Partners to:

- Provide equal employment opportunities regardless of race, ethnicity, gender, sexual orientation, religion, age, disability, marital status, citizenship status, or any other characteristic under applicable law.
- Provide a workplace free of bullying, harassment, and discrimination.
- Demonstrate mutual respect at all times.
- Support the development of a diverse and inclusive workforce.
- Encourage mental health and wellbeing.
- Make mechanisms available to employees to express any grievances or concerns without fear of reprisal, and ensuring any concerns are dealt with effectively and in a timely manner.

## 7. Health and Safety

We take our health and safety responsibilities very seriously and expect our suppliers to also operate in a safe manner at all times.

### We expect our Suppliers / Partners to:

- Provide a clean, safe, and healthy working environment and comply with Health and Safety at Work Act 1974 or any applicable laws and regulations regarding working conditions.
- Ensure suitable measures and procedures are in place, along with health and safety training, to prevent injuries, accidents, or ill health at work. Relevant qualifications and certifications of all workers and equipment must be proved prior to work proceeding along with any other relevant documentation.

## 8. Governance

The highest standards of integrity, honesty and ethical conduct are expected at all times. Employees and suppliers are expected to respect human rights and have policies and procedures in place to prevent unethical business practices, including, but not limited to, human rights abuses, bribery, fraud, corruption, tax evasion and money laundering. Our expectations, in relation to governance, are broken down into the following categories:

### 8.1 Data Protection and Information Security

Maintaining the confidentiality and integrity of customer data is vital to our managed service offering. Onecom's commitment to ensuring effective and robust procedures that align with GDPR and information security is evident in our ISO:27001 accreditation. Our suppliers are expected to ensure data is processed in accordance with the rights of data subjects under the General Data Protection Regulation (GDPR), as well as other regulatory compliance requirements which may apply. We expect all suppliers to safeguard the integrity and security of your systems, at all times and in full, and inform us immediately if you become aware of any cyber security incident that affects or has the potential to affect

Onecom information and/or customer data. Onecom's suppliers are expected to either have achieved ISO:27001 accreditation or have policies / procedures in place that align with ISO:27001.

### 8.2 Ethical Business Practice

Suppliers should be compliant with all laws, regulations and best practice relating to anti-corruption and competition including a prohibition on extortion, bribery, facilitation payments, unethical donations or other improper inducements, price fixing and market sharing.

### 8.3 Anti-facilitation of Tax Evasion

Onecom conduct all our business in an honest and ethical manner and take a zero-tolerance approach to the facilitation of tax evasion, whether under UK law or under the law of any foreign country. As part of our commitment to acting professionally, fairly and with integrity, Onecom has adopted an *Anti-facilitation of Tax Evasion Policy*. Suppliers must fully comply with their obligations in relation to all taxes due within the territories in which they operate or produce goods and implement and enforce effective systems to counter tax evasion facilitation. Suppliers must not participate in tax evasion, nor should they allow or assist others in committing tax evasion. Therefore, suppliers should carry out the necessary steps to maintain full compliance for companies who act on their behalf.

### 8.4 Conflicts of Interest

Suppliers are required to mitigate any conflict of interest which may occur when working with Onecom. Any such conflicts should be reported immediately.

### 8.5 Quality Assurance

Onecom always aims to exceed the expectations of our customers. Therefore, any supplier providing goods or services to Onecom are expected to do so efficiently, transparently and to a high quality.

### 8.6 Ethical Marketing

Marketing plays a significant role in how we attract and retain business and we acknowledge that there are ethical approaches we can take as a company to ensure that we can live by our business values. Marketing in an ethical way focuses not only on how our offering benefits our customers, but also how our company is striving to build honest and transparent relationships with customers and stakeholders. Onecom has adopted an *Ethical Marketing Policy* as part of our commitment to ensuring we uphold the highest ethics when it comes to our marketing protocols. Therefore, Onecom's suppliers are required to:

- Commit to absolute honesty in all marketing materials or campaigns.
- Prohibit the use of deceptive marketing practices, such as false advertising or misleading claims.
- Ensure marketing communications avoid anything likely to cause widespread offense, maintaining sensitivity to diverse backgrounds and perspectives.

## 9. Responsible Supply Chain Management

Onecom appreciate the importance of engaging with our supply chain and conducting effective due diligence to mitigate risks, as well as to maintain an ethical operational network.

**We expect our Suppliers / Partners to:**

- Appropriately manage your suppliers and subcontractors to maintain effective levels of business continuity and mitigate supply chain risk.
- Perform adequate due diligence on your supply chain.
- Have reasonable payment procedures in place to ensure employees / suppliers / subcontractors are paid in a timely manner.
- Encourage high levels of quality and innovation in your supply chain to provide continual value.
- Encourage / support actions or procedures that improve environmental, social or governance standards.

the same fairness and dedication to sustainability in all aspects of their operations. This Supplier Code of Conduct highlights important standards that are consistent with Onecom’s values and we expect all our suppliers to meet or exceed the provisions highlighted in this Code.

Maintaining a transparent and ethical supply chain is a key goal of ours and will work with you to develop our approach to responsible sourcing and sustainable procurement.

If there are elements where you fall short of this Code, you must inform us as soon as reasonably possible. We will work with you to develop an improvement plan accordingly. If the shortcoming is serious or cannot be resolved in a reasonable timeframe, we may review the provision of goods or services by you and ultimately discontinue the relationship.

Please note, the expectations within this Code are in addition to and not in lieu of any legal agreement.

## 10. Compliance with this Code of Conduct

Onecom expects all our suppliers to act with integrity, honesty and

## 11. Document owner and approval

Onecom’s Environmental Social and Governance (ESG) Committee own this document and are responsible for ensuring that this Code of Conduct is reviewed. A current version of this document is available internally and externally on Onecom’s website:

<https://www.onecom.co.uk/environmental-social-governance-policies>. This policy was approved by the Executive Leadership Team and is issued on a version-controlled basis.

Issue	Description of Change	Owner	Approval	Issue Date
1	First release	Yasemin Salih	ELT	December 2022
2	Branding update, addition of an ‘Ethical Marketing’ section & content changes to anti-tax evasion section.	Yasemin Salih	ELT	January 2024



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