



SUPPLIER CODE OF CONDUCT

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## INTRODUCTION

iamproperty is committed to being a responsible business in everything that we do. This Code of Conduct sets out our expectations, values, and fundamental principles which we expect suppliers to extend into their business and own supply chains.

You should contact us as soon as possible if you are concerned about any actions or decisions that contravene the standards set out in this code.

## **PEOPLE**

## **Health and Safety**

Suppliers must conform to all the relevant health and safety regulations and relevant legislation in delivering services to, or on behalf of iamproperty. All suppliers are expected to manage health and safety robustly, demonstrate industry good practice, and ensure that a secure, health and safety environment is in place for all employees. If a supplier is to be the subject of any prosecution or impending investigation relating to a breach of health and safety regulations, they should inform us at the earliest opportunity.

## Wellbeing

Managing the wellbeing of our employees and suppliers is also a priority: we focus on the physical and psychological aspects of promoting good health, including the workplace environment and task allocation, and we encourage all suppliers to do the same.

## **Respecting Human Rights**

Suppliers should have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners, and any communities affected by the supplier's operations.

Suppliers must comply with the requirements of the Modern Slavery Act 2015, and we expect them to publish an annual modern slavery statement where there is a legal obligation to do so.

# **BUSINESS CONTINUITY**

## **Management of Risk**

Suppliers should have established systems and procedures in place to demonstrate compliance with this code. All parties should be prepared to share intelligence of supply chain risks so that material commercial and operational risks such as the impact of losing a key supplier, cyber-risk etc. can be mitigated.

Suppliers must ensure that their systems and procedures are sufficient to mitigate any potential negative impact on iamproperty's brand and reputation.

We expect our suppliers to manage their own supply chains in a responsible and sustainable manner, including making reasonable efforts to monitor their supply chain, and ensuring their suppliers are compliant with the aims of this code of conduct. This includes:

- · identifying and mitigating supply chain risks
- having reasonable payment policies, and
- considering the ethical and sustainable practices of their supply chain, and proactively working
  with suppliers who represent a material risk.

#### **ENVIRONMENT AND SOCIAL**

## **Protecting The Environment**

Suppliers should be committed to sustainable development and minimising the negative impact of their operations on the environment. All environmental laws and regulations must be complied with.

# **Community Engagement**

Being a good corporate citizen is central to the way we choose to do business: We support and contribute to the social and economic well-being of the communities we work in, and we invite our suppliers who hold similar views to join us in these commitments.

# **GOVERNANCE**

# **Bribery, Corruption and Facilitation Payments**

We have zero tolerance of any form of corrupt practices including extortion and fraud, and we expect suppliers to be vigilant and proactively look for fraud, and the risk of fraud, in their business.

Suppliers should comply with anti-corruption laws including the Bribery Act 2010, and anti-money laundering regulations. We expect suppliers to have robust processes to ensure that subcontractors in their supply chains also comply with these laws.

# Gifts and Hospitality

Suppliers should not provide any gift, meal, or entertainment to a company employee in any situation in which it might influence or appear to influence any employee decision in relation to the supplier.

In other situations, suppliers may provide modest gifts meals or entertainment to iamproperty employees if:

- · they are not cash or cash equivalent such as gift certificates or gift vouchers
- they are consistent with customary business practice and supplier company policy
- · they are not frequent or excessive in value
- · they are not given to key influential people with the intention of directly influencing them
- · they do not violate any law
- they are reported in line with iamproperty's Anti-Bribery and Anti-Corruption policy

# **Conflicts of Interest**

We expect our suppliers to avoid conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with us. If such actual or potential conflicts do arise in the course of business, we expect our suppliers to disclose them to us in a timely way.

# **Transparency**

We expect suppliers to be open and honest in their dealings with us, and where required supply relevant information contractually or requested directly during the contract life cycle.

#### **Confidential Information and Records**

As a supplier, you may obtain confidential information from your interactions with our employees, systems or other suppliers to the company. We expect our suppliers to handle, keep, transmit and process confidential information safely and securely and only for the purposes permitted under its contract with iamproperty. Suppliers must not disclose any such information to third parties unless permitted under its contract with us, and your responsibility in this regard is a continuing obligation even after your contract with iamproperty has ended.

If a supplier believes that it has been given access to the company's confidential information in error, they should immediately notify their contact at the company and refrain from further distribution.

## **Personal Information**

As part of the services provided, suppliers may be required to process the personal data of iamproperty's clients and employees. Where this is the case, you must ensure that all personal data is fully protected in compliance with all relevant data protection legislation, including but not limited to the Data Protection Act 2018, and in accordance with accepted industry standards and our instructions.

Suppliers should inform us without undue delay if they become aware of incidents that affect or have the potential to affect our data protection obligations.

# **Cyber Security**

It is essential that suppliers safeguard the integrity and security of their systems and comply with relevant government standards and guidance. Suppliers must inform us immediately if they become aware of any cyber security incident that effects or has potential to affect our data.

# MONITORING AND REPORTING

#### Governance

We expect our suppliers to agree to and be able to demonstrate compliance with the principles set out in this document whilst working with us, and they should have robust processes in place to identity potential instances of non-compliance.

#### **Raising Concerns**

Suppliers must investigate and report any violations of this code to us in a timely manner, either by email at **enquiries@iamproperty.com** or by calling us on **0191 917 8999**.

# **Non-Compliance**

Suppliers are expected to take prompt, corrective action to remedy any identified non-compliance. Suppliers who do not meet the requirements of this code may be provided with the opportunity to correct the non-compliance.

However, if the issue is sufficiently serious or cannot be resolved in a reasonable time frame, we reserve the right to review and potentially terminate our business relationship and contract(s). The same also applies with any supplier who refuses to comply with this code.

To assist with monitoring and assessing compliance with applicable laws and this code, suppliers agree if so requested to permit iamproperty or a third party chosen by us to visit their premises, including to speak to their workers or review books and records related to their work with us, to assess compliance with any other requirements in this code.

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