

**GPE.**  
Greater together

# Supplier Code of Conduct

February 2023



## Introduction

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**GPE has a responsibility to ensure we build and nurture long term two-way relationships with our supply chain partners. Through the application of our values, setting clear guidelines, an understanding of our suppliers, and honest and pragmatic communications we believe we can work effectively with our supply chain to deliver exceptional results.**

We are committed to ethical practices when in the process of carrying out our business activities that are supported by our values and behaviours. These values include:

- We achieve more together
- We are committed to excellence
- We are open and fair
- We embrace opportunity

The overall objective of the Supplier Code of Conduct is to build trusting and open relationships, to integrate established standards that help our suppliers to operate ethically and responsibly and drive improved performance throughout the supply chain. This extends to anyone working on our behalf, either directly or indirectly. We recognise that the implementation of this Code of Conduct will be slightly different for each supplier.

We have systems in place to monitor our supply chain for incidents of corruption, bribery or unfair, anti-competitive actions and where any such practices are identified decisive action will be taken. Please refer to our Ethics Policy, Whistleblowing Policy and Modern Slavery Statement for further guidance.

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## Protecting our environment

We are committed to working with supply chain partners who share our commitment to decarbonise business activities and create climate resilient spaces. Through collaboration and shared values we will achieve our sustainability vision as outlined in “The Time is Now” our Statement of Intent.

We also expect suppliers to:

- comply with environmental legislation as a minimum, along with any standards and codes that may be specific to their industry
- consider the impact of their business on the environment and minimise energy and resource consumption. Where appropriate, suppliers should consider applying the principles of the circular economy through careful design, selection of materials and construction techniques
- review their own supply chains to ensure that products and services are sourced from ethically responsible suppliers with similar controls in place
- minimise the risk of pollution in line with our Environmental Management System, and report and monitor progress against relevant key performance indicators as required
- report any known environmental non-compliances to us to enable prompt action to be taken. This may include issues relating to nuisances such as noise, dust and odour; spillages, fly-tipping and uncontrolled emissions to air such as refrigerant leaks
- work to our Sustainable Development Brief, where appropriate and achieve relevant targets in connection with the reduction of embodied carbon and energy consumption and increased segregation of waste to increase waste recycling rates
- track their carbon emissions and set appropriate emission reduction targets toward achieving net zero carbon emissions by 2050. Work with us to provide information on the carbon footprint associated with the provision of goods and services to us, so that we can more accurately understand and monitor our scope 3 carbon emissions to support delivery of Our Roadmap to Net Zero





### Implementing high standards in health and safety

Suppliers should commit to creating safe working conditions and a healthy environment for all their employees and subcontractors. We expect all suppliers to comply with relevant health and safety legislation and with minimum standards and codes of best practice specific to their industry. We require all our suppliers to have Health and Safety arrangements in place with a written Health and Safety Policy (if they have five or more employees) and an effective health and safety management system. We also expect suppliers to demonstrate how they support the importance of both good mental health and the impact that work environment can have on stress and anxiety.

Membership should be maintained to at least one SSIP (Safety Schemes in Procurement), where this is appropriate for their line of work.

### We also expect suppliers to:

- comply with the requirements of our health and safety management system and our contractors site guidelines whilst working at our properties or at our head office and work with us to continually improve health and safety standards
- nurture a safe work environment – suppliers shall provide employees with appropriate workplace health and safety information and training, including written health and safety information and warnings, in their primary language
- avoid using materials that may be harmful to health either during their manufacture, use or disposal
- identify, evaluate, control and reduce employee exposure to physically demanding tasks or environments, including manual material handling, heavy lifting, prolonged standing, highly repetitive or forceful assembly tasks, loud noise and poor light
- ensure that they have adequate occupational health services to ensure the health and wellbeing of their employees, bearing in mind the nature and size of their business
- ensure that their subcontractors have appropriate health and safety standards and are competent (adequate skills, experience, knowledge, training, and resource) to carry out the proposed work
- register under the Considerate Constructors Scheme for work at our construction and refurbishment sites where appropriate

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## Upholding human rights and labour standards

The Company recognises the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organization and encourages its suppliers to do the same, in particular we expect that suppliers:

- protect their employees, ensuring that they can work safely, without risk of discrimination based on Protected Characteristics, harm, intimidation, harassment or fear
- minimise the use of agency staff at our properties
- apply high standards beyond their minimum responsibility to human rights, in particular supporting diversity and inclusion and, where appropriate to the size of their organisation, have a policy in this regard

We monitor our supply chain and conduct due diligence and risk assessments activities details of which are outlined in our Slavery and Human Trafficking Statement.

## Prevention of forced labour

Suppliers must not use any type of involuntary or forced labour, including indentured, bonded, slave or human trafficked labour. We expect that:

- employees must be free to terminate their employment in accordance with established local laws and rules
- suppliers will not retain workers government-issued identification, passports or work permits as a condition of employment
- suppliers will comply with the requirements of the Modern Slavery Act 2015 and, on request, provide reasonable access to consultants employed by GPE to undertake spot checks of its policies and procedures to prevent forced labour in its supply chain
- suppliers will ensure slavery, forced labour and human trafficking is a standing agenda item at all major project Principals meetings

## Prevention of child labour

Suppliers must not use child labour, either directly or indirectly. We expect that:

- the minimum age for workers is not less than as defined by the International Labour Organization Minimum Age convention and in compliance with local laws
- legitimate work for young workers (e.g., workplace apprenticeships and internships) comply with all local legal requirements particularly those relating to hours of work, wages and safe working conditions
- young workers are protected from performing any work that is likely to be hazardous or to interfere with their education or that may be harmful to their health, physical, mental, social, spiritual or moral development

## Wages and working hours

Suppliers must pay workers at least the minimum required by local law and provide all legally mandated benefits. We expect that:

- in addition to payment for regular hours of work, workers must be paid for overtime hours at such premium rate as is legally required
- all suppliers should pay their employees the Living Wage or the London Living Wage should be provided for service provider employees working in our buildings. At our developments, we are working with our construction contractors to support the continued roll out of the London Living Wage through their supply chains
- suppliers monitor the working hours of their employees and ensure that they do not breach local legal requirements and are in-line with internationally recognised standards of 48 hours of work per week and that the required rest periods of at least 24 hours every seven days are provided

### Freedom of association and collective bargaining

Suppliers should recognise the importance of meaningful and open communication and direct engagement between workers and management. We expect our suppliers to:

- respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal
- facilitate and not hinder the legal rights of workers to freedom of association, including joining or not joining any association of their choosing, and to bargain collectively

### Ensuring ethical working practices

The Company aims to develop relationships based on mutual trust and in good faith with its supply partners. All suppliers, directly and indirectly, working on our behalf must act in a responsible manner. We expect suppliers to:

- ensure materials have been sourced ethically, transparently and are certified to an industry standard, where appropriate
- uphold standards of fair business practice and not to enter into unfair practices to compete for our business
- ensure appropriate policies are put in place to ensure the prevention, detection and reporting of bribery, fraud, and tax evasion in accordance with applicable laws and regulations and consistent with the principles set out in GPE's Anti-Fraud Bribery & Corruption Policy which can be found on our website
- at each of our construction sites display details of Safecall, our confidential whistleblowing hotline
- ensure prompt payment to their subcontractors in line with the Prompt Payment Code

### Positively impacting our communities

We create a lasting positive social impact in London, working closely with our local communities and expect suppliers to proactively support this goal, where appropriate to do so as outlined in our Statement of Intent. We expect suppliers to:

- proactively look to the local community to source services, goods, and labour where possible
- support apprenticeship schemes and work with educational establishments to help address skills shortages
- support local community causes and charitable initiatives aligned to our social impact strategy
- develop positive relationships with our neighbours and occupiers, in particular on our developments and refurbishments

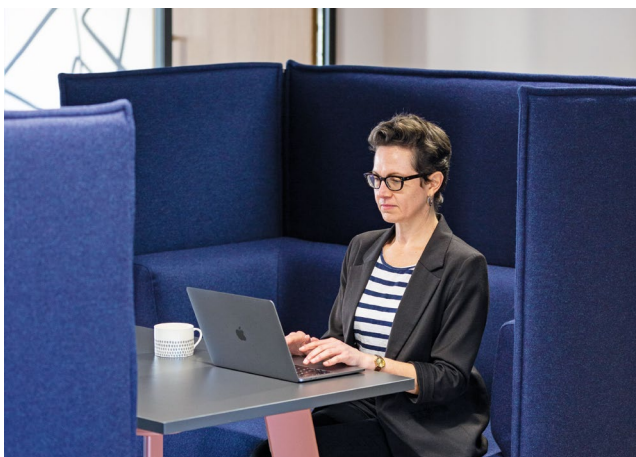
### Governance,

We will periodically monitor suppliers' adherence to this Code of Conduct and report our findings where it is appropriate to do so. In the case of a breach or potential breach of relevant legislation (e.g. suspected human trafficking, H&S, environmental breach, tax evasion, bribery) GPE should be notified as soon as the supplier becomes aware.

Wherever possible, we encourage our suppliers to raise any concern with their usual GPE contact. Alternatively, we have a formal whistleblowing policy which can be found on our website.

We will review this Code of Conduct on a periodic basis to ensure that it remains effective.

February 2023



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