

# Code of Conduct

Partnering with those  
who help deliver a  
safe, responsible &  
ethical business.

Delivering Today,  
Shaping Tomorrow.

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# 01

## Foreword

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**Care** *So that our customers feel like they matter*

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**Proactive** *So that we anticipate our customers' needs*

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**Professional** *So that our customers' expectations are met*

## Introduction

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**Wilson James conducts a vast range of procurement activities with numerous suppliers.**

**We believe that our suppliers are integral to our success. Our suppliers help us enhance our business and values and we are committed to ensuring that together we are a force for good. For this to happen, we need to select, engage, and treat our suppliers fairly and responsibly. Equally we expect our suppliers to be legally compliant, ethical, and sustainable.**

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This matters because good, professional relationships with our suppliers are key to our service delivery. Our suppliers are an extension of our business, and we want them to be and bring their best. That's why it's important that we are open and inclusive about the way we select, engage, and manage our suppliers, so that it provides a solid foundation to listen and implement innovation.

Since we see our suppliers as an extension of us, this Wilson James Supplier Code of Conduct closely follows our own WJ business Code of Conduct and sets out our expectations of conducting business together in relation to social, environmental, and ethical compliance.

# 02

## In Our Workplace

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## Health, Safety & Wellbeing

### How to do what is right

We are committed to maintaining a safe and healthy workplace in accordance with the 'Health and Safety at Work etc Act 1974.' We expect our suppliers to provide a healthy and safe working environment for employees, customers, partners, or others who may be affected by our suppliers' activities, in accordance with standards, local and national laws.

### What we expect

All employees and third parties involved with Wilson James work activities, to go home safe and healthy at the end of each working day:

**Our suppliers shall** put in place mechanisms to ensure that health and safety obligations are communicated and applied to parties under its control.

**Our suppliers shall** ensure they meet general principles of health and safety risk prevention. This includes identifying, minimising, and preventing hazards, using competent and trained people, providing, and maintaining safe equipment and tools, including required personal protective equipment at the expense of the Supplier.

**Our suppliers shall** have mechanisms in use to ensure that all their employees are competent to carry out the health and safety aspects of their responsibilities and duties.

**Our suppliers shall** have systems and training in place to prepare for and respond to accidents, health problems and foreseeable emergency situations.

**Suppliers shall** have means and procedures in place for recording, investigating, and implementing learning points from accidents and emergency situations. Suppliers are reminded of their obligation to inform Wilson James of any such incidents where contractually required to do so.

**Our suppliers** to seek to improve employee wellbeing to result in better staff retention to reduce lost time.

### Supporting policies

G02 – Health & Safety Policy  
HR06 – Drugs and Alcohol Policy

# Inclusion & Respect

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## How to do what is right

We encourage an inclusive workplace where we value the unique experiences, skills, and insights of our people. We expect our suppliers to respect people of all backgrounds and capabilities. Wilson James is committed to zero tolerance of any form of harassment, including sexual harassment.

## What we expect

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Everyone to be treated with dignity and respect to foster an inclusive environment that is a great place to work for all employees, customers, partners, or others who may be affected by our suppliers' activities:

**Our suppliers shall** not engage in or support any form of discrimination in hiring, employment terms, remuneration, access to training, promotion, termination, retirement procedures or decisions based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

**Our suppliers shall** ensure no form of discrimination is present at any stage of employment, from the selection of suitable applicants, their interview and assessment, to the terms of their employment, payment, and grounds for dismissal.

**Our suppliers should** also apply a high standard of engagement when liaising with sub-tier suppliers and customers, and when providing goods or services on any Wilson James or Client site, ensuring compliance to the same requirements, across the end-to-end supply chain.

## Supporting policies

HR09 – Equality, Diversity, and Inclusion Policy  
HR20 - Whistleblowing/ Disclosures in the Public Interest  
G20 – Modern Slavery Policy  
HR40 – Anti Harassment and Bullying Policy

# Data & Information

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## How to do what is right

We adopt best practices and internationally recognised standards and promote a positive information security and data privacy culture.

## What we expect

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Information Security:

**Our suppliers shall** ensure the confidentiality, integrity and availability of systems and processing activities that support our business and contribute to the security of Wilson James, its employees, clients, suppliers, and of the information that we process, transmit and store.

**Our suppliers shall** ensure compliance to all related legal and regulatory requirements and shall continuously monitor and advance technology and processes to improve information security posture to withstand any threat.

Data Protection

**Our suppliers shall** comply with all applicable data privacy laws in relation to use, processing, and storage of personal data.

Social Media

**Our suppliers shall** not mention Wilson James, or any of our Clients' names in any publicity material or similar communication to third parties without our prior consent.

## Supporting policies

G10 – GDPR Data protection policy.

# 03

## In Our Business Relationships

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## Law, Regulations & Standards

### How to do what is right

One of our values is Responsibility - we are responsible for all our actions and accountable for their consequences. At Wilson James we have a zero-tolerance approach to breaching law. We also choose to subscribe to internationally recognised standards so that our colleagues and clients can be assured that we do the right thing.

### What we expect

**Our suppliers must** avoid all conflicts of interest or situations that may be interpreted as conflict of interest.

#### Our suppliers shall not:

- Tolerate or enter into any bribery, including improper offers or payments to or from employees, customers, suppliers, organisations, or individuals.
- Engage in any activity, practice, or conduct which would constitute either a UK or foreign tax evasion offence.

#### Our suppliers shall

- Comply with all applicable laws relating to anti-slavery, anti-bribery and anticorruption including but not limited to the Bribery Act 2010, Modern Slavery Act 2015, and the Criminal Finances Act 2017.
- Include in contracts with its suppliers' anti-corruption, anti-bribery, anti-slavery, and human trafficking provisions in line with their Wilson James contract.
- Have in place reasonable policies and procedures to prevent facilitation of tax evasion by another person (including its employees).
- Act in accordance with all applicable international standards and laws on fraud and money laundering.
- Comply with competition law regulations.
- Maintain their company information on our OneTrust platform.

### Supporting policies

G09 - Ethics  
G14 - Anti-Bribery & Corruption  
G14a - Gifts & Hospitality Procedure  
HR20 - Whistleblowing/ Disclosures in the Public Interest

# Employment

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## How to do what is right

One of our core values is to treat each other with dignity and respect. We believe that Employment is freely chosen. Our commitment is to implement and enforce effective systems and controls which ensure that child labour and slavery and human trafficking are not taking place anywhere in our business or our supply chains.

## What we expect

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**Our suppliers do not** use forced, bonded or involuntary prison labour. Our suppliers' workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

**Our suppliers shall** strictly prohibit child labour. No person shall be employed who is below the minimum legal age for employment.

**Our suppliers shall** ensure that the appropriate 'Right to Work' checks are completed on all employees before employment commences. Evidence of such checks and associated documentation must be retained.

**Our suppliers shall** ensure its employees understand their employment conditions and give employees fair and reasonable pay as well as any legally entitled or agreed benefits.

**Our suppliers shall** not use deductions from wages as a disciplinary measure. Unless contractually agreed, the supplier shall not deduct from employees' wages for PPE, uniform, training, accommodation, etc. Employees must be paid in a timely manner and the supplier must clearly convey to its employees the basis on which they are paid.

## Supporting policies

G20 – Modern Slavery Policy  
HR20 - Whistleblowing/Disclosures in the Public Interest

# Responsible Procurement

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## How to do what is right

Our suppliers help us enhance our business value and we are committed to ensuring that together we are a force for good. We expect all our suppliers, including the sub-supply chain to be legally compliant, ethical, and sustainable.

## What we expect

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### Our suppliers to be aware that:

- Although they may have dealings with many people across Wilson James, the contractual agreement and execution with all suppliers is owned by Procurement.
- All commitments to spend money with a supplier can only be made via a Purchase Order.
- Suppliers must first obtain a Purchase Order prior to undertaking any work for Wilson James. Any supplier who acts on requests that have not been properly authorised may not be paid for that work by Wilson James.
- Suppliers are responsible for ensuring a correct invoice is submitted to Wilson James.
- Incorrectly submitted invoices may be returned to suppliers for correction and resubmission.

### Where our suppliers select and engage the market:

- They select business partners fairly and objectively and put in place terms that are no less favourable than the terms that Wilson James has contracted with them.
- They shall ensure the confidentiality, integrity and availability of systems and processing activities that support our business and contribute to the security of Wilson James, its employees, clients, suppliers, and of the information that we process, transmit and store.

- Our suppliers shall ensure compliance to all related legal and regulatory requirements and shall continuously monitor and advance technology.
- Our suppliers commit to expanding opportunities for Minority Business Enterprise, including Race, Disability and Gender, to participate in their procurement activities.
- There are positive benefits in introducing more competition either directly or through sub-contractors from previously untapped suppliers because we believe a healthy business is a diverse business.
- Our suppliers treat their sub-tier with dignity and respect, fostering an inclusive working environment.
- Our suppliers are encouraged to adopt the prompt payment for their sub-tier, in line with the Prompt Payment Code (PPC) principles.

# 04

## In Our Communities

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## Environment & Sustainability

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### How to do what is right

Sustainability lies at the heart of our Vision, and we are committed to playing our part in ensuring a sustainable tomorrow for future generations to enjoy. We do this through our Sustainability Plan built around three pillars of 'People, Planet and Performance', which reduces our impact on the environment whilst promoting social well-being, corporate charity, and economic improvement.

### What we expect

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#### Our Suppliers to:

- Conduct business in a sustainable and socially responsible manner, through the way they interact and engage with our employees, clients, other supply chain partners, local community, and other stakeholders.
  - Comply with all applicable legislation, regulatory and international standards.
  - Minimise the environmental impact of their activities on the planet, and continually improve their sustainability performance.
  - Promote recycling and reduce wastage in materials sourcing, handling, transport, and disposal and offer sustainable alternatives when providing goods and services to deliver more sustainable outcomes.
  - Seek to promote energy and carbon efficiency where appropriate.
  - Co-operate with Wilson James to measure and track the sustainability performance of goods and services supplied to Wilson James.
- Develop the way we conduct our business operations to achieve net zero carbon by 2040.
  - Ensure Sustainability is embedded into decisions and systems across their business, and put in place support mechanisms, training, and engagement programmes to achieve objectives.

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### Supporting policies

G12 - Environmental Policy  
G07 - Sustainability

# Community & Engagement

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## How to do what is right

Wilson James is committed to being a responsible business and giving back to the communities in which we work. We have a strong community engagement practice, which we apply on as many of our contracts as possible. We are an industry frontrunner when it comes to community, charity, and investment in both our people and the local communities that we work within.

## What we expect

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### Our suppliers are expected to:

- Seek to develop positive relationships within their local communities and the communities where they support Wilson James and respect the traditions, cultures and laws of the countries and communities in which we operate.
- To support local community initiatives where appropriate to their organisation.
- Plan to minimise disruption from their activities and our suppliers are encouraged to contribute to the sustainability and development of the communities in which they operate.
- Where appropriate and practicable, keep records of resources and time spent delivering community benefit and social value activities in conjunction with Wilson James, and, on reasonable request, provide this data to Wilson James.

Delivering Today,  
Shaping Tomorrow.



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For more information  
about our Supplier Code of  
Conduct, please contact us

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