


Policy

# Supplier Code of conduct

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This document is issued by e.surv Finance and sets out the Supplier Code of Conduct for e.surv and Walker Fraser Steele (WFS). Our aim is to deliver to the e.surv and WFS board on a range of commitments including good value within our supply chain that is delivered on budget and in accordance with the right specifications. In delivering these commitments we must ensure adherence to the highest standards of ethical and professional behaviour. Our suppliers play an important role in the delivery expectations, so our relationships with them are critical to delivering on those commitments.

As a business we are committed to work with our supply chain to ensure that the key objectives set out in this Supplier Code of Conduct are delivered by e.surv and WFS, our key suppliers and the wider supply chain. We need our suppliers to adhere to high standards of safe working conditions, fair and respectful treatment of employees, environmental and ethical practices.

## **1.0 Introduction**

- Our Code of Conduct sets out our expectations, values, and fundamental principles which we expect you to extend into your business and your own supply chain
- ♦ The overall objective of the Supplier Code of Conduct is to build trusting and open relationships between e.surv and WFS and suppliers in order to drive improved performance throughout the supply chain
- ♦ We expect our employees to treat suppliers with fairness and respect and to work jointly with suppliers to build trusting, collaborative, and constructive working relationships. In return we expect suppliers to treat our employees in the same way, and to work with us to build those trusting, collaborative and constructive relationships that are focused on delivering our expectations
- ♦ As a statement of good practice, this document should be read by all suppliers and e.surv and WFS stakeholders. We expect our suppliers to communicate this Supplier Code of Conduct to employees, subsidiaries and subcontractors; our commitment is that we will communicate it to all our employees

## 2.0 Policy Scope and Compliance

- The Supplier Code of Conduct is intended to set out the way in which we and our suppliers will behave towards each other. It is not intended to be legally enforceable, to create any legal obligations or rights or to undermine our contracts with suppliers or the rules we set out when we procure our goods and services, which at all times shall take precedence
- ◆ All employees having roles or responsibilities covered under this code of conduct are expected to be thoroughly familiar with the code of conduct and its obligations as they pertain to the employee's role
- ◆ We risk assess and carry out due diligence on our suppliers to ensure they meet our required standards. This may involve onboarding forms, questionnaires, and audits





### 3.0 Objectives

- ◆ The key objectives commit the organisation and every individual in the supply process directly or indirectly, to instil financial and social transparency in the supply chain, with the intention of creating accountability and full disclosure around issues such as:
  - (i) Human Rights
  - (ii) Inclusion & Diversity
  - (iii) Health & Safety
  - (iv) Environmental Impacts & Sustainability
  - (v) Data Protection & Security
  - (vi) Business Ethics & Behaviour
  - (vii) Corporate Social Responsibility (CSR)
- ◆ In addition, it is the Procurement department's objective that, as far as is within their power, it will only employ suppliers and contractors who subscribe to and operate on similar principles. The objectives in the above list are non-negotiable objectives. With this in mind we expect all suppliers to answer a pre-qualification questionnaire as part of our onboarding process. Evidence of accreditations should be made available upon request
- ◆ Relationships with our supply chain will always be based on transparency, integrity, and complete fairness. Therefore, e.surv and WFS will look to be part of a supply chain that is based around the objectives in this code of conduct, and we will always look to promote the message in this code of conduct to all our suppliers. Our suppliers will be encouraged to engage with their suppliers on the same basis, we expect our suppliers to carry out business in line with the values and aspirations outlined in this document

## 4.0 People

We want to be able to create a good relationship between all employees involved in the supply chain by promoting and creating a trusting and transparent way of working that promotes responsible business practices:

### **Respect:**

Our employees, those of our suppliers, and those in the supply chain have the right to respectful treatment. We will not tolerate discrimination, harassment, or victimisation in the workplace. We expect our suppliers to provide the same commitment, including to their own employees. The Equality Act 2010 protects against discrimination, harassment, and victimisation.

### **Professionalism:**

We will work constructively and collaboratively with our suppliers. We expect suppliers to be prepared to invest in their relationships with e.surv and WFS and establish trust with our staff and with other suppliers involved in delivery in the supply chain.

### **Meeting requirements:**

It is important that contracts with our suppliers meet the needs of e.surv and WFS. Our teams will work together with suppliers to articulate these outcomes and specifications to ensure that the goods and services being provided meet the needs of e.surv and WFS and we expect fully reciprocal behaviour from suppliers.

### **Human Rights and Employment Law:**

e.surv/WFS and suppliers must both comply with all applicable human rights and employment laws in the jurisdictions in which they work. This includes complying with the provisions of the Modern Slavery Act 2015. In addition, suppliers must have robust means of ensuring that the subcontractors also comply.

## **Health and Safety:**

Ensuring the health and safety of our employees and contractors and customers is a key objective for e.surv and WFS. We believe through commitment, robust management, and compliance with legislation and industry best practice, we can work together with our suppliers to eliminate or minimise health and safety risks, we expect the same commitment from our suppliers with evidence of risk assessments and risk monitoring.

## **Inclusion and Diversity:**

Inclusion and diversity is important to e.surv and WFS and our suppliers should proactively support the development of an inclusive and diverse workforce including fair representation of women, disabled, LGBT+ and Black, Asian and Minority Ethnic employees, and work to improve representation at senior levels within their management structure.

## **Environmental sustainability:**

Businesses and individuals have a responsibility to proactively identify, manage and reduce their environmental impact in line with the Climate Change Act 2008 to assist the UK in achieving its Net Zero target by 2050. This includes managing greenhouse gas emissions, energy consumption, waste management, pollution and water management. We expect you to understand these impacts and be working towards reducing them and comply with all legislation relating to environmental protection such as the Environment Act 2021.



## 5.0 Business Practices and Principles

We want to ensure that everyone in the supply chain is focused to deliver common objectives by promoting key businesses practices through the chain of command such as:

- **Management of Risk:** All parties should be prepared to share intelligence of supply chain risks, so that commercial and operational risks can be mitigated. We require suppliers of critical services to develop Business Continuity Plans (BCP) to ensure that critical services to e.surv and WFS continue without interruption
- **Continuous improvement:** We expect our suppliers to use recognised industry practices in the delivery of goods and services to, or on behalf of, e.surv and WFS. We also expect suppliers to continuously improve these goods and services and bring innovation, ideas and expertise to help e.surv and WFS address its strategic challenges and to support growth
- **Added value:** All stakeholders expect e.surv and WFS to obtain value for money and be able to demonstrate that long-term value as part of the relationship. This means that goods, services and contracts should be priced to offer sustainable value throughout their life cycle, including when changes are needed
- **Reputation:** We want to work with suppliers who are proud of their reputation for fair dealing and quality delivery. We want working with e.surv and WFS to be seen as reputation enhancing for the supplier. We expect all parties to be mindful of the need to maintain trust and ensure that neither they, nor any of their partners or subcontractors, bring e.surv into disrepute by engaging in any act or omission which is reasonably likely to diminish the trust that goes into the relationship
- **Operational Security / Information Security:** It is essential that suppliers safeguard the integrity and security of their systems and comply with the relevant e.surv/WFS Information Security Policy. We are committed to ensuring effective controls are in place to protect employees and company assets including physical and intangible assets such as information. Any significant compromise of personnel, physical information or IT security could result in disruption, with potentially serious consequences. We expect our supply chain partners to demonstrate a similar commitment to security and have in place best practices and policies in line with the ISO 27001 standards

- ♦ **Data Protection:** Personal data should be protected fully in compliance with all relevant data protection legislations including but not limited to the Data Protection Act 2018. We expect you to process any personal information or data shared with you by e.surv and WFS lawfully and in accordance with any contractual obligations under GDPR (General Data Protection Regulation)
- ♦ **Confidentiality:** e.surv/WFS and suppliers are both expected to comply with the provisions in our contracts and any legal requirements to protect commercial and sensitive information. Any information which is not covered by contractual provisions, should also be handled with the same care as information of similar sensitivity. Notwithstanding this mutual understanding, suppliers should recognise that this does not prevent e.surv/WFS from disclosing information where we are compelled to do so
- ♦ **Conflict of Interests:** We expect suppliers to mitigate appropriately against any real or perceived conflict of interest through their work with e.surv and WFS. A supplier with a position of influence gained through a contract should not use that position to unfairly disadvantage any other supplier or reduce the potential for future competition
- ♦ **Sustainable Procurement:** We are committed to being a responsible business and we recognise the value of the natural environment, and we want to ensure that environmental sustainability considerations are included in our investment, procurement, and operational decisions. We expect all our suppliers to support us in this approach as we work towards becoming a net zero business and actively work towards making a positive impact on environmental factors linked to our operations. We want our suppliers to be aware of and support e.surv and WFS in complying with its legal and contractual obligations under social value legislation. We expect suppliers to be open and transparent in assisting e.surv and WFS in reducing and reporting any environmental impacts. As a minimum we require our suppliers to comply with all legal requirements and obligations, to have an Environmental Sustainability Policy in place and to have an Environmental Management System (EMS) or be working towards an EMS such as ISO 14001

## 6.0 Standards of Behaviour

We want to promote and maintain the highest standards of ethical behaviour by promoting:

- ◆ **Transparency:** We seek to be transparent in our dealings with suppliers and we expect suppliers to be open and honest in their dealings with e.surv and WFS
- ◆ **Counter Fraud & Corruption:** We demand that suppliers adhere to anti- corruption laws, including but not limited to The Bribery Act 2010, and anti-money laundering regulations, including The Economic Crime and Corporate Transparency Act 2023 (which includes section 199, Failure to Prevent Fraud), where relevant. We expect suppliers to have robust processes to ensure that the subcontractors in their supply chain also comply with these laws. We have zero tolerance of any form of corrupt practices
- ◆ **Good Treatment:** We expect suppliers to deal fairly with the subcontractors and suppliers in their supply chain. It goes without saying that all suppliers will be treated fairly by e.surv and WFS with an honest and transparent approach promoting good relationships and business partnerships
- ◆ **Prompt Payment:** We expect both e.surv/WFS and suppliers to be fair and reasonable in their payment practices. Therefore, we operate with a strict Purchase to Pay process to ensure an efficient way to manage purchase orders, invoice processing and payments
- ◆ **Corporate Governance & Corporate Social Responsibility:** We expect our suppliers to adhere to the UK Corporate Governance Code or follow equivalent good corporate governance principles underpinned by robust processes. We also expect our suppliers to take into consideration social value legislation in delivering goods and services and supporting key social responsibility areas such as diversity, equity and inclusion

## 7.0 Monitoring and Reporting

At e.surv and WFS, we want to work closely with our suppliers to help you evaluate your activities to ensure you are keeping to this Supplier Code of Conduct and adhering to its provisions. We want to monitor this with you using internal and external multi stakeholder initiatives that should include:

- ◆ Understanding Supplier shortfall and Performance – regular assessments / ratings reviews
- ◆ Processes to manage and integrate key decisions – regular reviews and audits
- ◆ Commercial enforcement mechanisms – supplier management and contract clauses
- ◆ Ongoing training of all stakeholders – focussing on continuous improvements and raising awareness
- You must have a process in place to remedy any instances of non-compliance, breaches or problems identified through audits, reviews or questionnaires. You should bring to our attention immediately any significant issues, non-compliance or potential breaches of legislation or regulation

## 8.0 Policy review

This policy will be owned by the Procurement & Supplier Manager and reviewed every 3 years or when any amendments or changes are required. Please refer to the document Control for version details.



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