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British Heart Foundation

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Ethical Code of Practice for Suppliers and Partners

Version 4 – August 2020

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

Contents

1. Principles of the Code……. 3

2. Ethical Standards…….. 3

3. Adult Workers…… 4
- a. Working time……
- b. Remuneration……
- c. Equality of Treatment……..
- d. Security of Employment……..

4. Child Labour and Young Workers……... 6
- a. Child Labour……
- b. Young Workers……

5. Safeguarding……..... 8
- a. Safeguarding principles……
- b. Conduct……
- c. Reporting a safeguarding concern……

6. Health and Safety……. 10
- a. Aim……
- b. Responsibility……
- c. Standards……..

7. Environmental Sustainability……. 12
- a. Aim……
- b. Responsibility……

8. Product Safety Standards…….. 12

9. Data protection……. 12

10. Anti-bribery and Corruption…… 13

11. Tobacco…….. 13

12. Supplier or partner Declaration……. 13

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

1. Principles of the Code

The British Heart Foundation (**BHF**) is committed to operating, during the course of business, in accordance with the BHF Corporate Ethics (set out in the Ethical Standards page of this document) and with the BHF Anti-Slavery and Human Trafficking Policy.

The BHF seeks to ensure that all products and services purchased are safe, produced in a clean and safe environment and that all goods and services are supplied in accordance with all applicable legislation.

For the purpose of this document, 'suppliers or partners' are defined as any 3rd party company or individual that has a commercial agreement in place with the BHF.

The BHF will make every effort to enter into a strategy of positive engagement with its supplier or partner and to work together with them to reach the standards set out in this code. We will work with the supplier or partner to support any necessary improvements, but we will also take action, which may involve cancelling orders and ceasing to trade, if suppliers or partners are not prepared to make appropriate changes.

These standards are an integral part of our business and are considered to be substantially controllable by our suppliers and partners. It is the responsibility of our supplier or partner to apply the same principles in dealing with their own supply chain.

The BHF will seek to work with suppliers and partners who do not use sub-contractors or outworkers except as agreed and approved by the BHF. It is the supplier or partner's responsibility to ensure and provide evidence that any sub-contractors and outworkers used do conform to the criteria outlined in this code and all local legislative requirements.

It is the supplier or partner's responsibility to ensure that where local legislation sets higher standards than those set within the code that they meet those legislative requirements.

A sufficient and rigorous business continuity plan should be available immediately from the suppliers if requested by the BHF.

This code should be seen as a complement to, rather than a substitute for, collective bargaining or official regulation, and the implementation of this code must be sensitive to the rights and livelihoods of the workers it is aiming to protect.

The BHF will review this Code of Practice at least every three years.

2. Ethical Standards

BHF is committed to providing quality products to its staff, volunteers, supporters and customers in conjunction with its suppliers and partners and to promote high standards of business behavior and social responsibility.

Fundamental parts of this commitment are the BHF Corporate Ethics. The BHF will seek to identify and work with suppliers and partners who adhere to, as individuals and in the conduct of their business, ethical standards which are compatible with our own.

The BHF expects its business partners to be law abiding as individuals and to comply with local legal requirements in the conduct of all their business activities. This includes

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

compliance with the specific terms of the BHF Code of Practice and the following BHF Corporate Ethics:

- The BHF will only work with suppliers and partners who provide their employees with a safe and healthy work environment. Suppliers and partners must conform fully to the labour, health and safety laws of the country of manufacture as a minimum.

- The BHF has a zero tolerance approach to all instances of Modern Slavery. The BHF is bound by and supports the Modern Slavery Act 2015 and all suppliers should adhere to their responsibilities around it.

- The BHF supplier or partner shall recognise the dignity of the individual. They will not use slave or forced labour or trafficked individuals. They will afford the rights of lawful free association and collective bargaining to all employees, and the right to a workplace free of harassment, abuse, degrading treatment or corporal punishment. They will respect their employee's private and family life and their right to freedom of thought, conscience and religion.

- The BHF recognises and respects cultural differences; we will seek and identify suppliers and partners who employ individuals based on their ability to do the job, irrespective of their ethnicity, faith, gender or sexuality, or any other characteristic that may mean somebody experiences discrimination

- The BHF supplier or partner must comply with national laws and international standards that aim to protect the environment. This applies both in the country of manufacture and in the country in which the product is sold.

- The BHF encourages its supplier or partner to provide training and education for its employees to enable those employees to better perform their jobs.

- The supplier or partner should alert the BHF of any potential conflicts of interest at the earliest opportunity.

- Suppliers and partners should develop and implement an effective management system demonstrating compliance with this code's requirements and all local labour, health, safety, welfare and environmental requirements. Suppliers and partners must develop an internal self-assessment system and maintain compliance with the code and legislative requirements.

The BHF is a member of the Supplier Ethical Data Exchange (Sedex) organisation which is dedicated to driving ethical improvements in global supply. It is a platform for sharing ethical supply chain data, information on labour standards, health and safety, the environment and business ethics. The BHF encourages Sedex membership in its suppliers and partners also.

3. Adult Workers

Employers are expected to comply with the relevant national laws, industry or collective agreements and any codes of practice, but should also follow standards of employment practice.

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

a) Working Time

i. It is recommended that the maximum compulsory working week should be 48 hours. Where the employee freely gives their consent to work overtime, the working week may be extended. Overtime should not exceed 12 hours per week and any overtime worked should be paid or the equivalent time given as paid absence at a suitable later date.

ii. Every employee should be entitled to at least one day off each week.

iii. Every employee should be entitled to a period of paid holiday leave each year.

iv. Every employee should be entitled to take reasonable absence from work on the grounds of genuine incapacity through illness, without financial penalty or threat of dismissal. During any such leave the employee should continue to receive, as a minimum, a reasonable subsistence payment to meet basic needs.

v. Employees must be provided with a written and understandable statement detailing all terms and conditions of employment before they enter employment.

vi. Particulars of their wages must be provided for the pay period concerned each time they are paid.

vii. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.

NB: Detailed records should be maintained in respect of each of the above and be retained for a period of three years in a format suitable for inspection.

b) Remuneration

Employees' wages should meet or exceed the national legal or industry benchmark standards for a standard working week whichever is higher. In any event wages should be at least sufficient to meet basic needs and provide some discretionary income.

c) Equality of Treatment

A Company's employment practices and policies should afford all workers equality of treatment. Decisions or practices which are based on discrimination of a person due to their protected characteristics under the Equality Act 2010, will not be acceptable.

Specifically, the following standards must be observed in respect of non-discrimination:-

i. No job applicant should be unfairly refused employment or offered employment on less favourable terms.

ii. All employees should have equal access to jobs, training, promotion and transfer and no one should receive less favourable wages, benefits or access to facilities.

iii. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation shall be prohibited.

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

iv. Employers are expected to provide a pleasant and harmonious working environment and to protect their workers from bullying, verbal or physical harassment, victimisation, discrimination or physical abuse whether from management, from their colleagues or from members of the public.

d) Security of Employment

Wherever reasonably practicable all workers should enjoy security and stability of employment and regularity of income. To every extent possible, work performed must be on the basis of recognised employment established through national law and practice.

i. The practice of seasonal or periodic "lay-off" (of workers who require continuous employment), should be reviewed and minimised.

ii. The following practices, many of which seek deliberately to deny workers employment protection by law, are not acceptable:-

- "At will" terminations.
- Termination without notice.
- Inappropriate use of self-employed status for lower grade workers.

iii. A fair disciplinary procedure should be established and adhered to in all cases of alleged employee misconduct or unsatisfactory performance.

- An employee should not face dismissal without the opportunity to have a fair and objective hearing.
- Employees should also be afforded the right to appeal against any disciplinary action taken if they believe it to be unjust.
- A formal system must be in place to ensure the code of conduct is available to all employees and that they have a confidential way of reporting anyone who breads the code of conduct.
- All disciplinary measures should be recorded.

4. Child Labour and Young Workers

- A Child is defined as any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply. There shall be no new recruitment of child labour.
- A Young Person is defined as any worker over the age of a child as defined above and under the age of 18
- Child Labour is defined as any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant International Labour Organisation (ILO) standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

a. Child Labour

The BHF will not work with companies who continue to use child labour in any of their facilities.

i. There shall be also be no new recruitment of child labour

ii. Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child

b. Young Workers

A "young worker" is defined as someone over the age of a child as defined above and under the age of 18

i. The following controls should be in place for young workers:

- Companies should ensure that the legal minimum wage for their country is met.
- Break times should be increased to enable a minimum of 20 minutes rest time for each 4 hours worked.
- Overtime work will not be acceptable.
- If circumstances exist where employees cannot leave the factory due to dependency on company transport then educational facilities must be made available.

ii. Prior to employment, companies will be expected to carry out adequate checks to confirm that the individual is above the school leaving age and should then maintain detailed employment records suitable for inspection, which include a photograph and documented evidence of the young person's age.

iii. Written medical checks to be performed at least twice a year until they reach the age of 18. Records must be available for inspection.

iv. Expert opinion and evidence identifies additional health and safety risks to which young workers are exposed, associated with their inexperience, immaturity and lack of awareness of existing risks to their health and safety. In recognition of this, the BHF will support suppliers and partners who introduce both training and educational provision and workplace measures, which seek to minimise those health and safety risks, i.e.

- Risk assessments of the type of work they are required to perform should be undertaken to avoid exposure to health and safety risks.
- The nature, degree and duration of any exposure to biological, chemical or physical substances.
- The form, range, use and handling of work equipment and machinery.
- The job must be conducive to their inexperience and immaturity, i.e. no pressing, no heavy lifting, no exposure to dangerous chemicals or operations.

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

- Employees should introduce training in the safe and proper use of equipment and machinery and raise awareness of potential risks. The training should be provided for all new employees upon starting work and ongoing thereafter, particularly where equipment or processes have changed or where an accident has occurred.

5. Safeguarding

a: Safeguarding Principles:

The activities carried out by the British Heart Foundation (BHF) mean that there are a range of staff and volunteers, contractors and third party providers who may come into contact with people who are at risk of harm, including children and adults who the law says are vulnerable, those who work or volunteer for the BHF and those who come into contact with the BHF through our work.

We all have a responsibility under the safeguarding policy to act to protect all of our BHF staff, volunteers, our customers and supporters from abuse or harm.

As we recruit and work with people under the age of 18 years and people who may be vulnerable due to their physical or mental health, people who have an unspent criminal conviction or appear on a criminal register are not able to work in any of our premises.

Safeguarding is also about preventing further harm and when it does occur that we Recognise it, Respond to it and Report it. This is essential in creating a safe place to work.

The aim of the BHF safeguarding policy is to improve the knowledge and understanding of everyone who works with or on behalf of the BHF, irrespective of their position, about safeguarding all of those that come into contact with us through our work and to ensure everyone knows what to do if they have a safeguarding concern.

The BHF will take all reasonable steps to prevent harm or abuse and protect people who come into contact with our work from harm and abuse by creating and maintaining a culture of openness and trust underpinned by the adoption of a core set of safeguarding principles.

When there is a safeguarding concern raised and this relates to a supplier or service provider, we would expect the supplier to work with the BHF and other agencies to support the safeguarding investigation. In the process of the investigation we may share information with the police or local authority and in some cases require a DBS to be completed on those directly connected with the investigation.

b: Conduct:

The BHF has a zero-tolerance policy to harm and abuse and will take appropriate action if it is identified that anyone acting as a BHF representative or working or volunteering within the BHF acts in a way as to cause abuse or harm to an individual or individuals.

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

Staff, volunteers, contractors or third-party providers **must** abide by the following:

- Raise any incidents or concerns that cause you to believe that a child, young person or adult is, or is likely to be, at risk of harm or abuse;

- The BHF will support any contractor or third parties who raises a legitimate concern about the actions of others.

- It is not permissible (and in some instances may be unlawful) for you to:

- use your position to intimidate, bully, threaten, discriminate against, coerce or undermine children and young people, volunteers or staff;
- behave or communicate with children, young people or anyone else in ways which seek to build inappropriate relationships in order to abuse or put them at risk;
- use a relationship with a volunteer, customer, or their family for personal gain.
- give special rewards or privileges in an attempt to build inappropriate relationships with children and young people or any other person
- engage in, or attempt to engage in, sexual or inappropriate relationships with children, young people or adults who would be considered vulnerable for whatever reason, including the use of suggestive conversations, comments, texting or emails;
- possess indecent images of children; this will always be reported to the police regardless of the explanation provided;
- carry out your duties or volunteering whilst adversely affected by alcohol, solvents or drugs;
- encourage or assist others to break the law in any way;

Your employees/staff will conduct themselves in accordance with this Safeguarding Code of Conduct in all of their work or provision of services for the BHF. Any breach of the Safeguarding Code of Conduct may result in termination of your agreement/contract or involvement as a supplier to the BHF, as appropriate.

c: Reporting a safeguarding concern:

Concerns or allegations of abuse or neglect will always be taken seriously, investigated and, where necessary, reported to external agencies.

The BHF will seek to safeguard everyone who comes into contact with the charity through its work by valuing, listening to and respecting them.

All staff, volunteers and contractors working with or on behalf of the BHF will have access to information about how to report concerns or allegations of abuse.

Safeguarding concerns related to the BHF must be reported to the People Services Team by phone on 0300 222 5868 or by email at peopleservices@bhf.org.uk .

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

6. Health and Safety

a. Aim

It should be the aim of all our suppliers and partners to continue to work towards reducing accidents and maintaining the welfare of their employees.

b. Responsibility

It is recommended that each supplier or partner nominates a member of management to be responsible for health, safety and welfare requirements of the premises.

c. Standards

Minimum standards should be compliant with relevant national laws and standards but should also include the following:

i. **Fire Safety -** Provide and maintain safe and effective means of escape and adequate fire extinguishers. In addition, fire drills should be carried out twice a year so that employees are fully instructed and trained on the way to prevent fires and the use of fire extinguishers.

ii. **Work Place –** Employers must provide and maintain a safe and healthy work place and working environment. More specifically the following should be addressed:-

- Ventilation with fresh or purified air.
- Sufficient lighting, if possible by natural light.
- Securely guarded stairs.
- Readily accessible, suitable and sufficient sanitary conveniences should be provided with adjoining wash facilities providing clean running water.
- Drinking water supplies must be provided which are wholesome and readily accessible.
- Facilities should also be provided for eating meals.
- Adequate rest facilities should be provided.

The provisions of this code constitute minimum not maximum standards and this code should not be used to prevent companies from exceeding these standards. Companies applying this standard are expected to comply with national and other applicable law and, where the provisions of law address the same subject, to apply that provision which affords the greater protection.

iii. **Work Equipment -** Employers must ensure that any equipment provided for work is suitable for its intended purpose, maintained in an efficient state in working order and good repair. Dangerous machinery must be securely guarded.

iv. **Electricity -** Only trained staff should be allowed to work with electricity, with all electrical systems being maintained so as to prevent danger at all times.

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

v. **First Aid -** The employer should provide adequate and appropriate first aid facilities for their employees in case of injury or illness at work. These should include first aid kits which are regularly maintained and we would advise there should be at least one trained member of staff for every fifty workers. All first aiders should have refresher training every three years.

vi. **Accident Procedures -** To help prevent future accidents, accident procedures should be put in place covering accident reporting and logging, accident investigation and analysis.

vii. **Hazardous Substances -** The employer must ensure that procedures are enforced which ensure that all hazardous substances are delivered, stored, used and disposed of safely. Where hazardous substances are used then the following questions should be asked:

- Can the exposure of the worker be prevented? e.g. use a different, less hazardous substance. Use in a different form, e.g. liquid dye instead of powder dye.
- Can the exposure be controlled? e.g. by the mechanical ventilation enclosing the process.
- Finally, and as a last resort, provide personal protective equipment.

Employees exposed to substances hazardous to their health must be provided with such information, instruction and training as is suitable and sufficient for them to know the health risks associated with their exposure to the substances with which they work. They should also be familiar with the precautions necessary for their protection.

viii. **Manual Handling -** No employee should be required to lift, carry, push or pull any load which could harm them. Where possible, manual handling should be avoided by providing mechanical handling equipment. Job rotation should be used where repetitive strain type injuries could be a risk.

ix. **Personal Protective Equipment (PPE) -** Where risks are not adequately controlled by other means then the employer must supply suitable PPE, free of charge, to the employee.

x. **Training and Supervision -** The employer must provide as much information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of their employees. Training records must be kept for each individual employee.

xi. **Residential Accommodation -** Where residential accommodation is provided for employees it must be safe (particularly with regard to fire precautions), clean and provide sufficient space for an individual to live comfortably. Toilet and washing facilities should be provided with clean running water.

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

7. Environmental Sustainability

a. Aim

Our Sustainability policy has the following environmental objectives:

- champion the value of re-use through donated goods, helping reduce overall resource use and avoid associated greenhouse gas emissions
- improve the environmental footprint of the new goods we source for sale in our stores in terms of carbon footprint, sustainable agriculture, water use etc.
- apply a sustainable waste hierarchy to reduce, re-use and recycle at the maximum practicable level
- reduce single use plastic packaging throughout our supply chain
- minimise negative air quality impacts from vehicle fleet emissions of greenhouse gases and substances hazardous to health
- minimise our greenhouse gas emissions by choosing energy and fuel sources which have no associated Carbon Dioxide and other Greenhouse gas emissions where possible
- support and facilitate colleagues to use a sustainable travel hierarchy, prioritising remote working, active travel such as walking and cycling, public transport and shared vehicles over single occupancy vehicles

We strongly encourage suppliers and partners to commit to their own sustainability objectives in line with these aims.

b. Responsibility

At the least, suppliers and partners must meet all local and national regulations. In addition, we expect them to meet all of the relevant British Heart Foundation standards relating to the environment.

8. Product Safety Standards

The BHF is committed to ensuring that all of our products are safe for our staff, volunteers, supporters and customers.

It is the supplier or partner's legal responsibility to ensure goods supplied to the BHF comply with all existing UK and EU legislation and standards and any that come into force in the future. Consideration of quality and safety issues must be built in from the design stage onwards. Where the supplier or partner is in any doubt about the application of any Act or Regulation, they must seek their own independent legal advice.

9. Data Protection

Suppliers and partners will observe and comply with all obligations and requirements relating to the processing of personal data as set out in the contract between us and in the absence of any specific agreement shall always be aware of and comply with UK data protection law and GDPR requirements in relation to the Supplier or partner's handling or processing of any personal data it may undertake for the BHF.

Docusign Envelope ID: 423C3BC3-E11E-4DB6-9A73-26112F44CE99

10. Anti-bribery and Corruption

The BHF is committed to operating with honesty and integrity and in line with the Anti-Bribery Act 2010, in all of its activities and to promote an anti-bribery and anti-corruption culture. Suppliers and partners must operate with honesty, integrity and transparency in all business activities and promote and anti-bribery and anti-corruption culture throughout the organisation.

11. Tobacco

The BHF is actively involved in tobacco control issues because of the strong association between smoked tobacco and ill-health, including coronary heart disease. The BHF will not have any association or relationship with any entity that is either directly or indirectly involved in the production, marketing or sale of tobacco products (**Restricted Business**) or that derives its income (other than an insignificant or de-minimis part) from acting as the main or a significant advisor or consultant to a Restricted Business (**Restricted Activity**). The Supplier or partner must ensure that:

- it is not a Restricted Business;
- it does not carry out any Restricted Activity; and
- it will not have any commercial relationship with, nor sponsorship, support or other contact with, any individual, entity, organisation or brand owner that is a Restricted Business or carries out any Restricted Activity.

12. Supplier or partner Declaration

Please indicate your acceptance of and agreement with the contents of this Code of Practice by signing, dating and returning to the appropriate contact at the BHF.

Signed for and on behalf of Supplier or partner: } DocuSigned by: Umang Gandecha D55851541D834B9...

Name: Umang Gandecha

Supplier or partner Name: Londonist DMC

Position: Executive Director

Date: 10/25/2024

Signed for and on behalf of Agent (where applicable): }

Agent Name: _____

Name: _____

Position: _____

Date: _____