

# Supplier Code of Conduct Policy

**Category:** Finance

**Approval:** Board of Governors

**Responsibility:** Director Strategic Procurement and Compliance

**Date:** December 6, 2024

## Purpose/Reason for Policy:

The provisions set forth in this Code of Conduct outline the minimum standards expected of suppliers, and that of their subcontractors who provide goods and/or services to the University. Wherever possible, the University expects that suppliers will work proactively towards exceeding industry standards and best practices and encourages their suppliers to also meet the standards outlined herein.

## Scope of this Policy:

Any Supplier and their subcontractor(s) who supplies the University with goods and/or services are expected to abide by the tenets of this Supplier Code of Conduct Policy at all times. In instances where a supplier is found to breach or be non-compliant with this Code, the University may use any measures at its disposal to bring about compliance, including requiring remediation by the Supplier or its subcontractors.

## Policy Statement:

Suppliers and their subcontractors are required to abide by this Code. Suppliers and their subcontractors may not, however, advertise or promote in any way that they are compliant with this Code.

### 1. Environmental

Suppliers shall operate in an environmentally responsible and resource-efficient manner in accordance with existing legislation, applicable regulations and best practices. Suppliers should, wherever possible, proactively undertake initiatives to promote greater environmental responsibility within their own organization and their suppliers by:

**Reducing greenhouse gas emissions:** Suppliers shall strive to reduce greenhouse gas emissions wherever possible. Suppliers should develop processes to monitor, measure and evaluate their emissions to contribute to the University's Greenhouse Gas Emissions (GHGs) reduction targets.

**Reducing waste** – Suppliers shall have appropriate provisions in place to ensure the safe handling, storage, reuse or management of waste, wastewater and air emissions that protect the wellbeing of human health and biodiversity.

**Promoting biodiversity and responsible resource management** – Natural resources shall be used in an environmentally sustainable way including the avoidance of practices which contribute to deforestation and to refrain from conducting activity in areas that have high biodiversity value.

## 2. Social

Suppliers shall uphold the human rights of employees, communities, and vulnerable populations. Supplier commitments shall include equity, diversity, and inclusion (EDI), compliance with the Ontario Human Rights Code regarding discrimination, anti-harassment, and accessibility. Suppliers must ensure the following:

**Human rights** – Suppliers shall support human rights conventions and ensure that they are not willfully or passively compliant in human rights abuses. Where an abuse is discovered, Suppliers must notify the University and immediately seek to remedy the abuse.

**Prohibition of child labour** – Suppliers shall not employ workers under the age of 15 (or where an International Labour Organization (ILO) exemption exists). In instances where there are differences between local legislation and the ILO, the higher age shall be followed. In the absence of local laws, suppliers shall abide by the ILO regulations. Where a child worker must be displaced, adult family members should have the opportunity to assume the child's position to maintain family livelihoods.

**Prohibit all forms of forced/involuntary/indentured labour** – Suppliers shall not use forced, illegal, or prison labour including indentured or bonded labour or any form of compulsory labour to manufacture products. Suppliers shall not recruit or onboard employees in any way that contravenes applicable laws and regulations nor shall suppliers retain employees' identity papers or passports.

**Freedom to associate** - Suppliers shall recognize and respect that workers have the right to form or join trade unions of their own choosing and to collectively bargain.

**Promote supplier diversity** - Suppliers shall engage socially and economically different categories of their suppliers through inclusive sourcing processes that promote equal opportunities. Suppliers should also encourage the same principles within their human resources in the recruitment and promotion of staff.

## 3. Ethical/Behavioural

Suppliers shall act with integrity and in an ethical manner, in accordance with applicable laws and regulations. Suppliers must abide by the following:

**Ensure fair wages** – Suppliers shall pay employees at least the minimum wages required by local laws and maintain a written accounting of hours worked, deductions, and regular and overtime wages in a language understood by the worker.

**Ensure fair competition** – Suppliers shall take all necessary steps to ensure healthy competition amongst subcontractors. Suppliers shall not share privileged information, terms and conditions, or bidding strategies, or other information that restricts free and open competition.

**Ensure occupational health and safety** – Suppliers shall ensure that workplaces abide by occupational health and safety standards and promote safe working practices for their employees. Where appropriate, suppliers shall provide workers with adequate protective clothing and equipment to prevent, as far as can be reasonably practicable, adverse effects to health and safety.

**Avoid conflicts of interest** - Suppliers shall, in all matters with the University, abide by the University's governing Conflict of Interest protocols.

**Protect data and sensitive information** – Suppliers shall protect the University's data, including personal information and sensitive corporate information and take all reasonable measures to prevent the misuse, theft, fraud, and/or improper disclosure of the University's data. Suppliers shall comply with corresponding data protection laws and regulations.

**Avoidance of bribery and kickbacks** – Suppliers shall not engage in any form of bribery or other benefits of the University's staff, or family members in an attempt to further influence or attain potential business opportunities with the University.

Enforcement and Compliance:

**Consequences of Violating this Supplier Code of Conduct** – If the principles set forth in this Supplier Code of Conduct are not respected, the business relationship with the University may be reviewed and corrective action shall be taken in accordance with the relevant business contract(s). If no corrective action is taken, the University may go so far as to end the business relationship in accordance with the relevant business contract(s).

**On-going Monitoring** - The University, at its discretion, reserves the right to carry out due diligence assessments with Suppliers to verify compliance of the Policy. Assessments may include, but not limited to, obtaining the Suppliers ethical business practice policies, tools or management systems that address adherence to the principles of this policy.

**Reporting of Activities of Concern** – Suppliers and contractors shall provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting. The University expects suppliers and contractors to take action to prevent, detect and correct retaliatory actions.

**Record Keeping** – Suppliers and contractors shall maintain complete and accurate books, records, and documents, in accordance with generally accepted record keeping principles. Further, with reasonable notice, they will afford the University the right to audit and access their books, records, and documents to verify compliance with the obligations outlined in this Supplier Code of Conduct.

**Branding standards** – The Supplier shall not use any insignia or logo of the University except where required to provide the Deliverables, and only if it has received prior written permission of the University to do so.

**Animal welfare** – Suppliers whose operations or supply chains involve animals must follow best practices in supporting animal welfare and conduct their activities in respect of the internationally recognized Five Freedoms for animals:

- a. Freedom from hunger and thirst
- b. Freedom from discomfort
- c. Freedom from pain, injury or disease
- d. Freedom to express normal behaviour
- e. Freedom from fear and distress

Where local animal welfare laws and regulations differ from the Five Freedoms, the stricter requirements shall prevail and must be respected by supplier and contractors.

**Fair Trade for Apparel** Suppliers and subcontractors are to ensure that apparel manufactured for the University is made under humane working conditions in compliance with accepted international standards and local laws and to improve working conditions and labour practices in the apparel industry worldwide. Refer to Trent University *Fair Trade Purchasing Policy for Apparel* for overview of standards.

**Contact Officer:**

Director Strategic Procurement and Compliance

**Date for Next Review:**

September 01, 2027

**Related Policies, Procedures & Guidelines**

- a) Procurement of Goods and Services Policy
- b) Fair Trade Purchasing Policy for Apparel

**Policies Superseded by This Policy:**

- a) N/A