



# Supplier and Partner Code of Conduct

KCOM is the trading name of KCOM Group Limited and its subsidiary companies.  
Registered office 37 Carr Lane, Hull, HU1 3RE  
Registered number 2150618

KCOM Commercial in Confidence

# Introduction

Our goal is to make life easier and better for our customers. When our customers choose us we want them to feel absolutely sure they have made the right choice. This means giving them confidence that the goods and services they purchase from us have been sourced and produced in a fair and responsible manner and to the highest standards.

Everything we do at the KCOM is focused on ensuring that customers' experience of our company is outstanding. We would expect that our suppliers share the same values. Our Supplier and Partner Code of Conduct is our way of demonstrating that our suppliers support our principles and commitment to responsible business practice.

It means our customers can be confident that goods and services purchased through KCOM have been developed responsibly; lawfully; in decent working conditions; without exploiting the people who make or deliver them and without damaging the environment. Customers can also be assured that we seek to source locally where appropriate to do so in order to support local business.

To this end, this Code of Conduct applies to any person, partner or company involved in supplying goods or services to KCOM. It outlines the minimum requirements we expect from our suppliers, so that in turn, our customers receive the same best-in-class experience at every point of contact with the KCOM.

We expect that suppliers will communicate the principles outlined in this Code to subcontractors and any other business partners who may be involved in supplying any goods or services to KCOM as part of our agreed contract/s.

We also assume our suppliers shall endeavour to motivate such parties to adhere to these principles. The term "supplier" is used throughout this document to refer to all suppliers, partners and contractors.

# Our Principles

## Laws and Ethical Standards Fraud, Bribery and Corruption

At KCOM, we require that our employees do not take part in any activity that would affect their judgement when dealing with suppliers. In accordance with responsible business practice, KCOM employees are not able to accept inappropriate gifts or benefits from our suppliers.

We expect our suppliers to comply with the Bribery Act 2010 and to have procedures in place for the detection and prevention of fraud, bribery and corrupt business practises, as outlined in current legislation.

Compliance with the Modern Slavery Act 2015 by suppliers and the implementation of procedures and protections to ensure that the supplier's supply chain is also compliant is a necessity.

## Discrimination

We expect our suppliers to comply with the Equality Act 2010. This means that suppliers should not discriminate against any employee or worker on the grounds of race, age, disability, gender reassignment, religion or belief, sex, sexual orientation, marital or civil partnership status or pregnancy.

Suppliers should ensure that workers are never harassed, intimidated, bullied or threatened. All workers should be treated fairly and equally. Workers should have access to a grievance or appeal procedure and any disciplinary measures taken should be recorded.

We would also draw attention to our suppliers' duty to make 'reasonable adjustments' if a disabled job applicant or employee is at a disadvantage in relation to others. This duty applies to both the physical features of the premises, e.g. fittings and equipment, and to all other aspects of employment including recruitment, training and retention.

# Employment Practices

As a responsible employer, we aim to create a workplace that recognises and rewards the potential of our people. We achieve this through a focused people strategy and also through the creation of a fair and equitable workplace.

In keeping with our values, we expect that our suppliers will comply with current employment legislation at all times. We also expect that our suppliers will engage in the following ways:

## Freedom of Employment

To respect and support the right of employees and workers to associate freely and to communicate openly with management regarding working conditions without fear of repercussions. The employee's or worker's right to join a trade union, workers organisation, or seek representation should be acknowledged.

## Working Hours

All our suppliers should comply with legislation and/or industry standards on working hours.

## Managing Risks

We take our responsibility to identify and manage risk very seriously and we aim to support our suppliers by implementing the necessary processes and systems to control, manage, anticipate and respond to any challenges we face.

## Quality

Suppliers providing products and services to KCOM must comply with the requirements of ISO 9001.

## Health and Safety

Health and safety awareness and best practice is embedded within the KCOM's culture, values and behaviour.

We anticipate that our suppliers will be just as committed as we are to providing a safe, healthy and compliant working environment for all employees and other third parties in order to preserve their health, safety and welfare and to prevent accidents, injuries or work-related illnesses.

All suppliers of physical services working for or on behalf of KCOM must have achieved certification to an SSIP member scheme.

We expect that suppliers of product will comply with applicable health and safety laws and regulations in relation to the products they supply us.

## Environment

The KCOM's environmental policy outlines our commitment to reducing our impact on the environment and to have a positive impact on the communities we serve. As such we expect that our suppliers will also comply with applicable environmental laws and regulations in relation to the products and services they supply us. In keeping with our values, we anticipate that our suppliers will seek to minimise any significant impacts that they may have on the environment.

## Security

Suppliers providing products and services to KCOM must comply with the relevant requirements of ISO 27001 and ensure that appropriate security controls, service definitions and delivery levels are effectively implemented, operated and maintained.

## Business Continuity, Disaster and Emergency Prevention and Recovery

We want to deliver a consistent service to our customers at all times. To give our customers confidence in our ability to do this, we expect our suppliers to have plans in place that mitigate the impact of any potential or realised disruption that may impact their, or that of any of their suppliers/partners ability to continue the supply of goods and/or services to us.

## Monitoring and Reporting

We recognise that in order to be a responsible business we need to ensure our suppliers are following this Code. We expect our suppliers to evaluate their own activities to ensure that they are keeping to this Code throughout all their business activities. They should also have suitable awareness and training opportunities in place to enable all managers and employees to support the principles of this Code.

We will also carry out audits, where appropriate, to ensure compliance with the Code. To enable this we will need access to suppliers and their subcontractors. After the audit has been carried out any areas of concern or opportunities for improvement will be addressed to the supplier. Failure to correct any issues raised could result in order or contract cancellation. We believe that our approach to monitoring and reporting will ensure that we are working together to deliver consistently excellent customer service.

***We look forward to working with you and we aim to have a responsible and positive effect on the communities we serve.***