

# Supplier code of conduct



# Introduction

Founded In 1853, Skipton Building Society (Skipton) set out to help people create a better future by providing a good place for people's savings and helping people own their own home. More than 160 years later, our purpose remains the same. From our people, to the environment and the communities we serve, we're helping to build a better future. This commitment to our customers extends to the products, goods and services provided by third parties throughout our supply chain. All suppliers are expected to comply with all relevant aspects of law, regulations and standards. All suppliers are expected to act in a way that supports our core values of **Trust, Ownership and One Team**.

## Governance

As part of our supplier on-boarding process Skipton will carry out due diligence checks on all organisations we are considering working with and all suppliers will be expected to adhere with this code of conduct.

Suppliers will be risk assessed and, where appropriate, we may ask for annual evidence of adherence to this code. Part of these checks may require Skipton, or a party appointed by us, to visit your premises for an on-site assessment.

Skipton will communicate any changes to this code with our nominated account manager, or equivalent, and we would expect this to be cascaded to any key personnel working on our relationship.

## Supplier Relationship Management

As part of our investment into building effective partnerships within our supply chain, every supplier will have a dedicated Key Contact who will manage the day to day relationship and, where applicable, be present at ongoing supplier review meetings. In addition, we have a dedicated Supplier Relationship Management (SRM) team who will assist in ensuring you can comply with our internal policies/procedures and support the ongoing relationship. This may include you being sent a supplier feedback survey to help us identify any improvements we can make to our SRM framework for the benefit of Skipton and our suppliers. The SRM team can be contacted for advice and support on any aspect of the framework via [srmmailbox.co.uk](mailto:srmmailbox.co.uk)

# Code of Conduct

Skipton is committed to being a responsible and sustainable business. We support the UN Sustainable Development Goals (SDGs), an ambitious plan to end extreme poverty, inequality and climate change by 2030. There is much we can do to support the SDGs, and our commitment to these goals extends to our supply chain. Therefore, we've created our Supplier Code of Conduct

Our Supplier Code of Conduct describes the standards we expect our suppliers to follow. We've identified that 10 of the 17 SDGs are most relevant to our supply chain, and this document outlines how these standards contribute to these relevant goals. Suppliers should adhere to these standards, demand the same of their own suppliers, and commit to the continual improvement of business practices. In doing so, they too will contribute to the SDGs. We expect that suppliers comply with applicable laws, regulations and contractual agreements. Adequate documentary evidence of relevant policies, practices and procedures should be kept. Employees should be trained to comply with these standards. We encourage our suppliers to reflect on the issues raised in our Supplier Code of Conduct. We welcome feedback and look forward to working in partnership with our suppliers to ensure its implementation and further our shared contribution to accomplishment of the SDGs.



Learn more about Global Goals at: [globalgoals.org](https://globalgoals.org)

# How we can all support these goals

We've identified that 10 of the 17 SDGs are most relevant to the suppliers operating in our supply chain, and they are presented here in order of significance.

## Business Ethics



### Goal 16: Peace, Justice and Strong Institutions

Bring a strong moral compass to business activities, act ethically and with integrity.



### Goal 9: Industry, Innovation and Infrastructure

Be a resilient business.

## Social Responsibility



### Goal 5: Gender Equality

Ensure that all women are able to fully and effectively participate at all levels of decision-making.



### Goal 8: Decent Work and Economic Growth

Respect the human rights of employees and provide a safe and healthy working environment.



### Goal 10: Reduced Inequalities

Promote an inclusive and supportive workplace that is diverse and where people are treated equally.



### Goal 11: Sustainable Cities and Communities

Be involved in improving communities so that they are inclusive, safe, resilient and sustainable.

## Environmental Sustainability



### Goal 6: Clean Water and Sanitation

Use water efficiently.



### Goal 7: Affordable and Clean Energy

Use energy efficiently.



### Goal 12: Responsible Consumption and Production

Use natural resources sustainably in products, services, operations and the supply chain



### Goal 13: Climate Action

Make plans and take decisions that improve resilience against climate hazards.

# Business Ethics

We expect our suppliers to conduct business in an ethical manner and act with integrity.



## Goal 16: Peace, Justice and Strong Institutions

“Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels”

### Business Integrity

Suppliers must not practice or tolerate any form of corruption, extortion, or embezzlement. Suppliers will not accept or offer bribes or other unlawful incentives from/to business partners.

### Conflicts of Interest

Suppliers should make decisions free of any conflict of interest. Our suppliers must make us aware of any actual or potential conflicts of interest, particularly if there are any economic interests between the supplier and any of our employees or contractors.

### Hospitality and Gifts

Suppliers should not accept or offer gifts, except for gifts of low token value. Hospitality and gifts must be legal, within policy limits (for the giver and receiver), not cash or a cash equivalent, transparent and documented.

### Data, Privacy and Intellectual Property

Suppliers must safeguard and use confidential information appropriately. They must ensure that all employee, customer, and business partners' data, privacy, and intellectual property rights are respected.

### Fair Competition

Suppliers should conduct business in compliance with fair competition and applicable anti-trust laws.

### Information Security

Suppliers must have appropriate controls in place to manage the risks to proprietary information, particularly customer and other highly critical data.

### Whistleblowing

Suppliers should encourage their employees to raise concern about potential breaches of law, regulation, ethics or trust.

### Accessibility

Suppliers should strive to be as inclusive and accessible for customers and colleagues as possible. Where they are not, adjustments should be made to resolve this.



## Goal 9: Industry, Innovation and Infrastructure

“Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation”

### Business Continuity Management

Suppliers should have a Business Continuity Plan (BCP), which clearly details what will happen in the event of an unforeseen event. Suppliers should have a disaster recovery plan which is regularly tested and reviewed.

### Vulnerability Testing

Where suppliers hold personally identifiable information, suppliers must conduct regular penetration tests and vulnerability assessments.

# Social Responsibility

Suppliers should have a Business Continuity Plan (BCP), which clearly details what will happen in the event of an unforeseen event. Suppliers should have a disaster recovery plan which is regularly tested and reviewed.



## Goal 8: Decent Work and Economic Growth

“Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all”

### Child Labour

There must be no use of child labour.

### Forced Labour and Modern Slavery

Suppliers must not use forced or involuntary labour of any type (e.g. forced, bonded, indentured, human trafficking or involuntary prison labour). Suppliers must comply with the Modern Slavery Act 2015 where applicable and ensure their supply chain is transparent about the process through which employees are managed. A copy of our Modern Slavery statement can be found on our website.

### Freedom of Association

Suppliers should commit to open and inclusive dialogue with their employees and their representatives. Employees should be free to join labour unions, seek representation, join works councils, and engage in collective bargaining.

### Health and Safety

Suppliers must provide a safe work environment, abiding by local laws and regulations; Suppliers must ensure health and safety is effectively managed, so that health and safety risks, issues, incidents and non-compliance are identified and addressed in order to provide adequate facilities to ensure the health and well-being of its workforce. Employees should receive regular health and safety training, and accidents should be recorded.

### Tax

Suppliers must have zero tolerance in respect of tax evasion and the facilitation thereof, paying the right amount of tax at the right time and maintaining an open and constructive working relationship with tax authorities. Appropriate prevention procedures should be in place relating to tax evasion as well as its facilitation.

### Working Conditions

Suppliers should provide safe and hygienic working conditions. Access to clean toilet facilities, drinking water, and sanitary food storage facilities must be provided.

### Working Hours, Wages, and Benefits

Regular employment should be provided. Working hours must not be excessive. Overtime should be voluntary and not excessive. As a minimum, wages and benefits should meet national legal standards. Wages should be enough to meet basic needs and provide some discretionary income.

**10** REDUCED INEQUALITIES



## Goal 10: Reduced Inequalities

“Reduce inequality within and among countries”

### Diversity and Inclusion

Suppliers must not discriminate when recruiting, compensating, training, promoting, or terminating on the basis of race, national or social origin, gender, age, physical characteristics, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression, or any unlawful criterion. Suppliers should promote an inclusive and supportive workplace, and exercise equal treatment and encourage diversity.

### Fair Employment

Suppliers should provide a workplace free from harsh and inhumane treatment, sexual harassment, abuse, mental or physical coercion, verbal abuse, or the threat of any such treatment. It is expected that suppliers document disciplinary procedures and grievances.

### Respect and Dignity

Suppliers must not engage in abusive discipline, act in a threatening way towards employees or submit employees to demeaning conditions.

**11** SUSTAINABLE CITIES AND COMMUNITIES



## Goal 11: Sustainable Cities and Communities

“Make cities and human settlements inclusive, safe, resilient and sustainable”

### Community Involvement

Suppliers should be aware of the impact they have on their communities and be involved in improving communities, for example by helping charitable causes and social enterprises, and supporting their employees to volunteer in the community.

**5** GENDER EQUALITY



## Goal 5: Gender Equality

Achieve gender equality and empower all women and girls”

### Gender Equality

Suppliers must comply with gender pay gap reporting legislation where applicable. Suppliers should seek to ensure women’s full and effective participation and equal opportunities at all levels of the organisation.

# Environmental Sustainability

We expect our suppliers to operate in an environmentally sustainable manner that limits adverse impact on the planet. Suppliers should seek to continually improve their environmental performance.



## Goal 12: Responsible Consumption and Production

“Ensure sustainable consumption and production patterns”

### Environmental Management

Suppliers should maintain policies, processes and requirements for environmental protection that is in accordance with laws, regulations and standards.

### Waste

Waste should be handled, moved, stored, recycled, re-used, and managed in compliance with local laws.

### Reduce, Re-use, Recycle

Suppliers should reduce, re-use and recycle materials where possible. Products and packaging should be designed to simplify re-use and recycling. Suppliers should eliminate single-use plastics where possible.



## Goal 13: Climate Action

“Take urgent action to tackle climate change and its impacts”

### Adaptation and Mitigation

Suppliers should seek to develop their adaptive capacity to address climate risk and develop mitigation plans to tackle the causes of climate change. Suppliers should make efforts to reduce greenhouse gas emissions from their operations and from the manufacture and use of their products.

### Logistics and Transportation

Suppliers should seek to minimise the environmental impacts arising from logistics and transportation choices.



## Goal 6: Clean Water and Sanitation

“Ensure availability and sustainable management of water and sanitation for all”

### Water Consumption

Water should be used efficiently and conserved where possible.

**7** AFFORDABLE AND  
CLEAN ENERGY



## Energy Consumption

“Ensure availability and sustainable management of water and sanitation for all”

### Energy Consumption

Energy should be used efficiently and conserved where possible.

# Speaking Out

Skipton Building Society has a Speak Out (whistleblowing) policy which sets out the process through which genuine concerns about potential or actual wrongdoing or misconduct by the Society's employees or its third parties can be raised. We encourage suppliers and other third parties who we work with to use any of the available channels, to raise concerns if they experience something that doesn't seem right or doesn't match our values. We treat concerns raised by suppliers in the same way as we would a concern raised internally.

How third parties can comply with the policy?	Why this is Important to the Society
<p>Encourage employees, through communications and training, to raise concerns relating to wrongdoing, misconduct or inappropriate behaviours. If concerns relate to the Society or its Group, the Group Secretary and General Counsel should be informed to agree an approach to investigating and resolving the concern.</p>	<p>At Skipton Building Society we take whistleblowing very seriously and are committed to investigating any allegations raised. SBS is committed to conducting its business with openness, transparency and integrity and ensuring that concerns are properly investigated and responded to.</p>
<p>Inform their employees that in addition to their own internal procedures, employees engaged to work along with the Society or its Group can also escalate their concerns related to the Society's business or its employees by:</p> <p>Reporting at concern via Safecall UK web portal via Report An Incident &amp; Update (safecall.co.uk) available 24 hours a day, seven days a week; or by writing to the Group Secretary and General Counsel at The Bailey, Skipton BD23 1DN; or by contacting the FCA or PRA directly</p>	<p>Third parties regulated by the FCA or PRA must have appropriate internal procedures for handling reportable concerns made by whistleblowers, as part of an effective risk management system. Reporting concerns via the Safecall UK web portal can help protect the identify of individuals wishing to raise a concern but who also wish to remain anonymous.</p>
<p>Ensure that nothing in the arrangement prevents or discourages employees, engaged to work with the Society or its Group, from choosing to make a protected disclosure via any of the above channels, including to the regulators, before following its internal arrangements. Specifically, contracts of employment, non-disclosure agreements and confidentiality agreements cannot prevent workers from reporting suspected wrongdoing, misconduct or inappropriate behaviours by the Society's employees or its third parties.</p>	<p>To ensure that all employees, contractors and temporary staff can feel confident to raise concerns without fear of negative repercussions and do not feel deterred from doing so, even if the concerns turn out to be mistaken.</p>

**Notes:**

Group in this context means Skipton Building Society, Skipton Business Finance Limited, Amber Homeloans Limited, North Yorkshire Mortgages. Separate but similar policies and procedures are maintained by Skipton International Limited, Connells Limited and Jade Software Corporation Limited.