



## **SUPPLIERS' CODE OF CONDUCT**

### **1.0 Purpose and scope**

This code states the expectations of our suppliers and other third parties doing business with Origin Housing Ltd (OHL), and its subsidiary and associate entities. In this code they are referred to collectively as the Origin Housing group. In this instance the definition of a supplier is any individual, business (including affiliates) that is paid a fee for the supply of any goods or services to any part of the Origin Housing group and includes all persons employed by our suppliers be they permanent, temporary, working under contract or instructions from the supplier, full or part-time. This code also states the expectations of those partners not paid a fee, which may include volunteers and organisations, in which Origin Housing reciprocates with or partnerships with. This can be classified as a “Non-fee Supplier”.

Compliance with this code and our high ethical standards is a mandatory requirement for suppliers and non-fee suppliers to any part of the Origin Housing Group, and as such any failure to comply with this code or the laws and regulations of the country in which the supplier and non-fee supplier operates will be fully investigated and appropriate action taken.

### **2.0 Code of conduct responsibility**

We expect each supplier, other third party and non-fee supplier shall put in place adequate systems, appropriate to the size of its operations, and have and comply with adequate policy and procedures to support the requirements within this code. We expect our suppliers, other third parties and non-fee suppliers by mutual agreement, will allow Origin Housing to audit their supporting policies and compliance to this code of conduct.

**Bribery and corruption**

We expect our suppliers, other third parties and non-fee suppliers to avoid even the appearance of wrongdoing. suppliers, other third party and non-fee suppliers shall not offer, give or receive bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any improper advantage and never use or permit others to do such things for them. This includes any type of facilitation payment, large or small, even where such payments are perceived as a common part of local business practice or acceptable under local law.

**Gifts and hospitality:**

We expect our suppliers, other third parties and non-fee suppliers not to try and influence or pressurise us or others, or give Origin employees things that may create a sense of obligation or that could be misconstrued or misrepresented by others, and we don't want Origin Housing group suppliers, other third parties and non-fee suppliers to be influenced or pressurised in turn through the acceptance of inappropriate gifts or hospitality.

**Fraud and deception:**

We expect our suppliers, other third parties and non-fees suppliers not to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so on their or our behalf. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property. Suppliers should always act honestly, fairly and openly, carefully checking or inspecting things that are your responsibility.

**False claims:**

We expect our suppliers, other third parties and non-fee suppliers not to submit false claims, so we insist on complete transparency and documentary evidence, require assessments to be as reasonable and

accurate as possible, backed-up and substantiated, and that particular care is taken when calculating and claiming or applying for payment, extension of time, loss and expense, variations, interim and final estimates, valuations and measurements. In return, we will treat supplier claims fairly and honestly

**Open and fair competition**

We expect our suppliers, other third parties and non-fee suppliers to compete in a marketplace that is fair, open and honest, and we want everyone to know this is how you will always behave. We expect our suppliers, other third parties and non-fee suppliers to comply with competition and anti-trust laws wherever they do business, and we in turn will do the same. Companies that compete fairly and aggressively are companies who will survive and prosper even through tough economic times. We want to work with strong suppliers and partners who succeed on the merits of their service offering, not by resorting to unfair tactics to gain improper advantage.

**Harassment, bullying and Discrimination:**

We expect our suppliers, other third parties and non-fee suppliers to be committed to creating a working environment in which everyone is respected and can flourish equally, without fear or favour. We do not tolerate behaviour or attitudes that support coercion, intimidation or discrimination. Whenever and wherever we observe such behaviour, we challenge it and support others who do so. We expect this of you too

**Health and Safety:**

Origin Housing group's commitment is: All workplace and work related injuries and ill-health accidents are preventable.

Health and Safety is an integral part to our approach to work and services.

Good safe behaviour can create a risk free environment.

We expect our suppliers, other third parties and non-fee suppliers, who work for or with us to:

- Embed health and safety as core elements in all they do.

- Take a lead in requiring and delivering health and safety
- Stop work if at risk due to unsafe conditions, ineffective personal protective equipment, unsuitable tools or equipment or inadequate information or training.
- Work with us to eliminate the risk of serious harm from all our activities.
- Uphold and promotes our policies and expected behaviours.
- Be intolerant of unsafe behaviour, short cuts and unplanned work.
- Support those who challenge these unsafe practices, and holds people to account if they don't conform.
- Insist that everyone is involved, informed and engaged.
- Challenge, learn and innovates to reduce risk.
- Immediately report injury, ill health condition or near miss whilst at work.
- Ensure their staff come to work in a fit condition to perform their job, free from the influence of alcohol or drugs.
- Keep the work area safe, clean and tidy at all times.

**Confidentiality &  
Data  
Protection/GDPR**

In order for suppliers, other third parties and non-fee suppliers to carry out their work, Origin Housing group may have to share personal or sensitive information about its customers, staff or related third parties with its suppliers, other third parties and non-fee suppliers. Similarly, suppliers, other third parties and non-fee suppliers may have access to confidential or sensitive information about our residents and/or the business during the course of their work. Personal information is defined as any information that could identify a person or relates to them. Examples of this are a person's name, address or even an IP address. Sensitive information about a person may include their disability or access arrangements.

Any such information obtained by our suppliers, other third parties and non-fee suppliers acting on your behalf is expected only to be used as directed by Origin Housing group. Any personal data about an individual must be kept in line with General Data Protection Regulation and for no longer than is necessary to carry out the specified work. Suppliers, other third parties and non-fee suppliers will need to demonstrate their processes for retention and deletion of data. Personal information must not be passed to any third party without the express written permission of Origin Housing Group or the person concerned.

Any information obtained by a supplier, other third party and non-fee supplier about Origin Housing group's business must not be disclosed to a third party unless permission has been obtained in writing from a member of Origin Housing group's Information Governance Group.

Under the EU General Data Protection effective from 25th May 2018, Origin Housing is obligated as a Data Controller to notify the Information Commissioner of any data breach within 72 calendar hours of becoming aware of the breach even if it applies to the activities of a third party data processor such as a supplier. In order to give Origin Housing sufficient time to investigate and notify the Information Commissioner we require suppliers to commit to notifying Origin Housing of any breach of Origin Housing's personal data within 24 hours of the supplier becoming aware of the data breach. So by signing this code of conduct you are agreeing to use best endeavours to notify Origin Housing of any breach of Origin Housing's personal data that the supplier might experience as fast as possible and under any circumstances within the 24 hours. This notification is to be served by emailing [data.notification@originhousing.org.uk](mailto:data.notification@originhousing.org.uk) with summary details of the data breach and contact details for the supplier's data breach lead as soon as possible, even if the exact nature and extent of the breach is still being investigated. We need to know that the breach has occurred as soon as you become aware of it so we can notify the Information Commissioner and subsequently clarify the details that will

emerge from investigating the breach. It is essential that the supplier understands that this obligation is within 24 hours irrespective of whether these are working hours. So for example, if the supplier became aware of a breach at 7pm on Good Friday during an Easter weekend we would need to be notified well before 7pm on Easter Saturday, this is so that we can make sure we would notify the Information Commissioner by 7pm on Easter Monday.

**Duty of Care & Safeguarding Adults:**

We expect our suppliers, other third parties and non-fee suppliers actions will always conform to relevant UK law and industry regulation, and will avoid deliberately causing any adverse effect on the human rights of people in their organisations, or the organisations they affiliate or do business with as well as the local and wider environment. We expect our suppliers, other third parties and non-fee suppliers to comply with all UK national laws on wages and working hours.

In Origin Housing group, we are committed to working with a wide range of vulnerable service users, and throughout our services, our suppliers, other third parties and non-fee suppliers could, from time to time, become aware of/or suspect situations where abuse of a vulnerable person may be taking place. In all cases where it is suspected that abuse of a vulnerable person is occurring, we expect our suppliers, other third parties and non-fee suppliers to notify a member of Origin Housing group.

**Conflict of interest:**

We expect our suppliers, other third parties and non-fee suppliers to remain free from conflicts of interest that may adversely influence their business relationship with Origin Housing group. We expect our suppliers, other third parties and non-fee suppliers to commit to disclose any potential conflict of interests promptly to Origin Housing group's Information Governance Group

We expect our suppliers, other third parties and non-fee suppliers not to offer any employee, be they permanent, temporary, working under contract from Origin Housing group or instructions from Origin Housing group, full or

part-time, any discount, inducement or reward other than that specifically documented in a signed contract or terms and conditions of business.

Examples of things we expect our suppliers, other third parties and non-fee suppliers to avoid (not exhaustive):

- Inappropriate gifts or hospitality that exceeds very modest limits.  
This includes any hospitality that involves sporting, theatre, music or other entertainment.
- Sharing our sensitive information with a competitor.
- Not disclosing a direct financial relationship with a competitor or supplier to Origin Housing group

**Contracts:**

Supplier contracts will usually be in the form of a purchase order covered by our standard terms and conditions or a signed and legally binding supply agreement. We expect our suppliers and other third parties to always use their best endeavours to meet the obligations they commit to under these agreements.

**Payment:**

We expect our suppliers, other third parties and non-fee suppliers to not offer to pay or accept receipt of any payment for more than a contractually agreed market rate for goods and services. All payments sent and received will follow our strict financial control procedures.

**Intellectual Property Rights:**

Origin Housing group retains the ownership of all intellectual property that we create unless agreed otherwise in advance with our suppliers, other third parties and non-fee suppliers. In return, we respect the intellectual copyright vested in our suppliers, other third parties and non-fee suppliers intellectual property.

**Professional conduct**

We expect our suppliers, other third parties and non-fee suppliers to conduct their activities professionally, with integrity, courtesy, respect and dignity. We expect our suppliers, other third parties and non-fee suppliers

**Confirmation of your  
Commitment to the  
Modern  
Slavery Act 2015**

will take care to be objective in their judgement, so that issues are never influenced by anything other than the best and proper interests of our business relationship.

We expect our suppliers, other third parties and non-fee suppliers to use all reasonable endeavours to ensure that its business and that of its subcontractors (all tiers) and supply chains to be free from slavery and human trafficking.

**GDPR Contractual  
Requirements Article  
28 (3)**

Processing by a processor must be governed by a contract that is binding on the processor with regard to the controller and that sets out the subject-matter and duration of the processing, the type of personal data, categories of individuals whose data is being processed and the obligations and rights of the controller.

The contract must stipulate, in particular, that the processor will:

- a) Process only on documented instructions
- b) Ensure those processing personal data are under a confidentiality obligation
- c) Take all measures required under the security provisions (Article 32) including pseudo-anonymising and encrypting personal data
- d) Only use a sub-processor with the controller's consent, notify changes to controllers, giving them an opportunity to object; flow down the same contractual obligations to sub-processors
- e) Assist the controller in responding to requests from individuals exercising their rights
- f) Assist the controller in complying with the obligations relating to security, breach notification, DPIAs and consulting with supervisory authorities



- g) Delete or return (at the controller's choice) all personal data at the end of the agreement (unless storage is required by EU/member state law)
- h) Make available to the controller all information necessary to demonstrate compliance, allow/contribute to audits (including inspections); and inform the controller if its instructions infringe data protection law

**Appendix A –  
Supplier GDPR  
Compliance  
Questionnaire**

Origin Housing Group expects its suppliers, other third parties and non-fee suppliers to comply with the Data Protection Act 1998/General Data Protection Regulation (GDPR) 25 May 2018.

Origin Housing group expects its suppliers, other third parties and non-fee suppliers to implement and complete Appendix A: Supplier Compliance Questionnaire, which is attached to the Code of Conduct, if a supplier, other third party and non-fee supplier is processing Origin's personal information.

### **3.0 Why values and ethics matter?**

Our reputation is a vital business asset. It underpins our ability to operate in the communities that we serve. It gives customers, employees, partners, sub-contractors, suppliers, investors and the many communities we serve confidence in us. Compliance with this code protects our reputation and commercial interests, but there's even more to it than that.

Our code sets out the things we stand for and insist on. It is there to ensure we all operate not just legally, but ethically and fairly, and never fall short of the standards we set for ourselves. It gives us all a clear framework within which to make decisions, and provides the foundations on which we build, protect and enhance the relationship we have with all our stakeholders, so wherever we work, we are trusted.

Our five group-wide values of Customer Focus, Integrity, One Team, Committed and Adding Value are essential in helping to guide our employees to understand the way that we behave. We expect our suppliers and other third parties to act in a manner consistent with our values.

Rooted in our group values, Origin Housing group's Supplier Code provides all our suppliers and other third parties with a clear framework within which to make the right decisions.

### 3.1 What we value – Origins values help to define what we stand for:

#### Take the lead



Take action, get involved, listen, challenge, be objective, question, help, try things out, make a difference. We embrace change and are inspired and encouraged to make change happen.

#### Create energy



We direct our energy towards moving things forward. We gain energy from our achievements which, in turn, motivates us even more.

#### Build trust



There exists a common trust between us; our residents and each other. We are inclusive, united by our shared goal to build thriving communities where people can prosper and grow.

#### Be generous



We are committed to giving more of ourselves - it comes naturally to us. From this we feel fulfilled.

## Stay grounded



We 'get' life; we know where it can take people - sometimes up, sometimes down. We're realistic and pragmatic in our approach. We believe it is our social responsibility to get individuals, families and communities back on track.

## Remember the little things



We're here to make the world a better place; one small action at a time. Little things add up and become a big change.

# APPENDIX A: General Data Protection Regulations (GDPR), Supplier Compliance Questionnaire

Company Name:-

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## **IMPORTANT NOTE – PLEASE READ**

Origin recognises the importance of respecting the personal privacy of all our tenants, residents, customers and employees, and keeping information that we hold on them secure. If, as one of Origin’s suppliers, you will be processing personal information on our customers, tenants, residents or employees, please complete the form below. By processing information, we mean any of the following: obtaining, recording or holding information (or data) or doing things with it, such as filing, organising, adapting, altering, retrieving, disclosing, disseminating, erasing or destroying it.

Will your Company be processing personal information (see definition above)?

**Yes / No**

If yes, then please continue to answer the questions in the Supplier Compliance Questionnaire and then sign the document below.

## **Supplier Compliance Questionnaire - Data Protection Act**

1. Is your organisation registered with the Office of the Information Commissioner as a Data Controller? Please provide either your registration number (.....), confirm any exemption applied, or confirm that your Registration includes a statement that you process personal information on behalf of others (Data Processor).

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2. Has your organisation implemented and documented a Data Protection Policy that specifically references the requirements noted in Schedule 1 of the Data Protection Act of 1998 and which

binds your organisation and all its employees and/or contractors to compliance with those requirements? Please also confirm that it will be updated or has been updated to meet the requirements of the EU General Data Protection Regulation.

**Yes / No**

3. Does your organisation have a documented and implemented Information Security Policy which binds your employees and/or contractors and third parties to compliance with its Security arrangements?

**Yes / No**

4. Do you require all staff having access to Origin's Personal Data to sign a confidentiality clause within their contracts of employment and retain an acknowledgement of receipt of your Information Security Policy?

**Yes/ No**

5. Does your organisation offer GDPR training on induction and at least annually to all employees and/or contractors that deal with personal information?

**Yes / No**

6. Does your organisation maintain records of this training?

**Yes / No**

7. Does your organisation take sufficient technological measures to assure the confidentiality, integrity and availability of personal information entrusted to you or accessed by you? Please describe.

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8. a) Has your organisation established data breach monitoring systems? Yes/No. If "yes", please detail the nature of these monitoring systems and if "no", please detail your time bound plans for establishing suitable monitoring systems.

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b) Has your organisation established a procedure to ensure best endeavours, and with time being of the essence, in notifying Origin Housing of any breach of Origin Housing’s personal data that the supplier might experience as fast as possible, and certainly within the 24 calendar hours of the supplier becoming aware of the breach? Yes/No. If “yes”, please detail the nature of this procedure including who will be the supplier’s data breach Lead contact and if “no”, please detail your time bound plans for establishing a suitable procedure.

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9. Has your organisation breached any of the provisions of the Data Protection Legislation or GDPR in the last three years? If so, please give details of the breach and any penalty imposed.

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10. Please confirm that all personal data provided to your organisation, or accessible by your staff for the purposes of fulfillment of the contracted services with Origin is prohibited from being used for any other additional purposes, other than as directed within the Contract, without the express permission of Origin Housing.

**Yes / No**

11. Once personal data data received from Origin is no longer needed for the purpose for which it was made available, and upon instruction, Origin requires that your organisation will permanently destroy/remove Origin personal data from your environment.

Please detail how this process will be undertaken (software application to permanently erase data, cross cut shredders, contracted third party disposal etc) and how you will verify that this process has been completed.

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12. Please confirm that you have processes in place for deletion and anonymisation of Origin data. **Yes/no**

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13. Do you or any contractor acting under your direction process personal data outside the European Union?

**Yes/No**

If "Yes", please advise on what safeguards are in place to protection personal data and ensure it is processed in compliance with data protection legislation:

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Declaration:

In compliance with the requirements set out in the Suppliers Code of Conduct above which I confirm I have read and fully understand and will comply too, I also confirm that I have complied/will comply and implement with immediate effect the specific requirements as I've provided for in the Suppliers GDPR Compliance Questionnaire and will follow the GDPR regulations as it applies in the UK while providing services to Origin Housing Group.

I confirm that I have not inserted any conditions or made any unauthorised alterations to this document.

I warrant that I have all the requisite corporate authority to sign this Declaration

Signed:

Date:

On behalf of:

Registered  
Address:

Print Name:

Position: