

# SERVICE EXPRESS CODE OF CONDUCT FOR SUBCONTRACTORS AND SUPPLIERS

## 1 Introduction

This code of conduct (the “**Code**”) reflects the core values, ethics and standards by which Services Express does business with its customers, business partners, subcontractors and suppliers. The Code reflects the wish of our organisation from the directors and senior management downwards to be seen as a responsible company that cares about people and the environment.

We therefore require every person and organisation that Services Express deals with, whether supporting the business internally, or our customers, to reflect our values by complying with the Code. The standards presented in this document are also used in due diligence and selection processes when we are looking for new suppliers and subcontractors.

All subcontractors and suppliers will be required to sign up to comply with this Code either by provisions within separate contractual agreements or being subject to Services Express’s standard terms of purchasing goods and services at <https://www.bluechip.co.uk/supplier-terms-conditions>. Any breach of this Code will be viewed as a material breach of any contractual arrangements.

## 2 Recruitment Environment

### Basic Screening

Services Express recognises that its success and continued growth is a direct result of not just the skills of its staff but also of their professionalism, honesty and integrity, enabling our customers and business partners to feel that they can trust Services Express to always operate in an ethical manner. The selection and recruitment of the right people not just as employees, but also as subcontractors and suppliers is key to retaining this trust.

Any subcontractors or suppliers providing services to Services Express must perform basic screening of all employees that will be working with Services Express (and be able to provide evidence of such screening on request). As a minimum screening should include confirming identity, the taking up of references, verifying background history for the three years prior to employment, and confirming the right to work in the United Kingdom.

### Additional Screening

Where a subcontractor or supplier is providing IT services to Services Express customers, each employee involved in delivering the services must have undergone or provided a clean basic Disclosure and Barring Service (DBS) check (which should be repeated at least every three years) and have background history verified for five years prior to joining the employment of the subcontractor or supplier.

### Security Checks

Services Express is proud that it is frequently selected for the delivery of IT services, particularly hardware maintenance, for organisations in the public sector and/or hosted in very secure locations due to the nature of their business. Any subcontractor or supplier assisting Services Express in the provision of such services may need to have and prove key employees are certified to a further level of security clearance prior to selection.

### 3 Workplace Environment

#### Treatment of Colleagues, Customers, Suppliers and Partners

Services Express aims to provide a working environment that respects the rights of the individual and that everyone treats colleagues and staff from customers, subcontractors, suppliers and business partners with respect. Any behaviour that undermines this aim is unacceptable. Services Express does not tolerate any form of harassment or bullying under any circumstances.

The responsibility to ensure that harassment does not occur in an organisation is the duty of its directors and managers, whilst all staff are expected to uphold the policy. A clear dignity at work policy should be maintained including examples of behaviour and values that are unacceptable readily available in an Employee Handbook, training course or equivalent information source.

#### Diversity and Equality

Services Express values diversity and seeks to provide all staff with an equal opportunity for employment, career and personal development, based on ability, qualifications and suitability for the work as well as their potential to be developed into the job. We believe that people from different backgrounds can bring fresh ideas, thinking and approaches which make the way work is undertaken more effective and efficient.

Services Express will not tolerate direct or indirect discrimination against any person on grounds of age, disability, gender, gender reassignment, marriage, civil partnership, pregnancy, maternity, race, religion or belief, sex, or sexual orientation anywhere in its own organisation or that of customers, subcontractors, suppliers or business partners.

It is also the responsibility of all companies working with Services Express to demonstrate in their policies, business processes, decisions and behaviour the promotion of inclusion, diversity and equality. Each organisation is expected to comply with all relevant local and international legislation and to ensure that they do not discriminate against any individuals associated with the work environment.

#### Health and Safety

It is Services Express's policy that consideration is always given to the important matter of health and safety. This applies to the maintenance of safe and healthy working conditions, equipment and systems of work for all its staff and visitors and to provide information, training and supervision as needed for this purpose.

Suppliers and subcontractors must accept responsibility for the health and safety of others who may be affected by their activities and aim to encourage a positive attitude to health and safety within the whole company and to promote health, safety and welfare practices. A process should be in place to allow the reporting of all accidents, injuries and unsafe practices or conditions.

All companies working with Services Express should have policies and standards in place to provide a healthy and safe working environment for staff and visitors. All staff should receive full health and safety induction training on commencement of their employment and further health and safety training is provided where necessary, including attending any training required by Services Express or our joint customers.

All staff should be encouraged to refresh their knowledge of the health and safety policies at regular intervals and all visitors to company premises should be made aware on arrival of relevant health and safety procedures, and given briefings in non-office environments such as data centres, warehouses or other high risk areas. Access to all such areas should be controlled and restricted to authorised staff and visitors only.

#### Drugs and Alcohol

Services Express believes it is essential that all individuals are in full control of themselves and their faculties throughout the working day, whether working in their office or on customer premises. It is important in terms of their work, their relationships with their colleagues and customers. Any reduction in a person's faculties can also impact their ability to perform their job and produce quality work output.

We recognise the potential dangers to the health and safety not just of individual employees, but also their colleagues and our customers, from the abuse of alcohol or drugs (which could be both the use of illegal substances or misuse of prescribed/legal medication) if an alcohol/drug problem is untreated. Services Express is committed to providing all staff with information about the effect of alcohol/drug misuse.

We expect the same standards from its suppliers and subcontractors. All companies must maintain strict policies to ensure no unauthorised use of drugs or alcohol while staff are engaged in any work related activity and respect our right and that of our customer to refuse access to premises where any individual is reasonably thought to be under the influence of drugs and/or alcohol.

### Modern Slavery and Human Trafficking

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Services Express has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all business dealings and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains. Our latest annual statement can be found at: <https://bluechip.co.uk/modern-slavery>

We are also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with legal disclosure obligations under the Modern Slavery Act 2015. The same high standards are expected from all organisations we use to deliver goods and services to our customers, whether directly or indirectly.

As part of our contracting processes, we will perform due diligence on all suppliers and subcontractors which includes specifically ensuring there is no use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers and subcontractors can demonstrate holding their suppliers to the same high standards.

## 4 Business Environment

### Compliance with laws and regulations

Services Express is committed to full compliance with all laws, rules and regulations applicable to businesses operating in the United Kingdom, including any industry specific rules and regulations to which we must adhere given the nature of our customers. We expect the same from our subcontractors and suppliers, including compliance with any contractual flow downs Services Express is expected to pass on from customers.

We also appreciate that being in compliance with laws, rules and regulations may sometimes mean engaging directly with regulators or other government bodies and that this will also be required of our subcontractors and suppliers on occasion. All such engagements should be professional, and on an open, clear and honest basis. If you are contacted direct by any regulators or other government bodies in relation to services you provide for Services Express, you must inform us immediately where permitted.

### Data Protection

As with all companies, Services Express handles personal data for its staff. The nature of many services provided by Services Express means we are also frequently storing and undertaking processing on data belonging to our customers that may contain personal information that can be used to identify individuals. Even where such processing is not performed en mass, we are responsible for the safe keeping and proper use of business contact information relating to our customers as well as subcontractors, suppliers and business partners.

Services Express is totally committed to protecting the personal data of individuals and expects the same from its subcontractors, suppliers and business partners, including having relevant fair processing notices in place, an overall data protection policy, as well as appropriate security and organisational controls. We agree a comprehensive data processing agreement with customers where we process personal data and require that relevant subcontractors and suppliers commit to having similar agreements in place with us.

### Information Security

Services Express maintains accreditation to ISO 27001 as the recognised standard for information security, and as a minimum we expect all our subcontractors and suppliers to have a defined and enforced Security Policy with related procedures that address appropriate security controls for premises, networks and IT infrastructure. The need for such a Security Policy is a prerequisite where Services Express or customer information is held.

If a subcontractor or supplier requires access to the Services Express internal IT network and/or systems, including where such facilities are used for accessing joint customer environments, the organisation must agree to and comply with the Services Express "Information Security Policy for Subcontractors and Suppliers" available at <https://www.bluechip.co.uk/supplier-terms-conditions>.

Where a subcontractor or supplier is providing IT managed services to Services Express customers, each such organisation must have a Security Policy and Information Security Management System (ISMS) which is at least compatible with the ISO 27001 standard although formal accreditation to the standard is preferred and will reduce the need for Services Express or its customers to perform security related audits.

Information security procedures should include a documented process for handling security breaches, including for the loss, damage or unauthorised access to personal data and/or other confidential information. Procedures for handling security breaches must include clear steps for promptly informing Services Express of any security incident that affects its information or that of joint customers or puts such information at risk.

All subcontractor and supplier staff should undergo regular (at least annually) audited awareness training on the organisation's Security Policy, the potential risks and impacts of not appropriately caring for personal data and other sensitive information, and the procedures for reporting security breaches or concerns. All new employees should undergo similar awareness training as part of their induction.

### Conflicts of Interest and Bribery

Services Express's policy is to conduct all our business in an honest and ethical manner, ensuring that personal interests do not conflict with professional duties. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

All Services Express staff are required to familiarise themselves and strictly follow the company's Anti-Bribery Policy. Subcontractors and suppliers must have an Anti-Bribery Policy in place which describes their organisation's commitment and individual employee obligations in regard to conflicts of interest, and bribery and corruption, including the receipt of unsolicited gifts or adhere to the Services Express available on request.

### Due Diligence

Where organisations assist in providing IT managed services to Services Express customers, in addition to having appropriate data processing agreements, accreditations and processes, each subcontractor or supplier is expected to permit Services Express, our joint customers, or their representatives to perform reasonable policy, business process and security audits, including testing of the controls that have been implemented.

## 5 Environmental Commitment

Services Express recognises that environmental protection as an integral part of its management function at all levels of the company. In line with our Environmental Policy, we view this as a primary responsibility and a measure of good business practice is adopting the highest environmental protection standards. We have a long term strategy to be carbon neutral as a business, including our energy intensive data centre operations.

To support our strategy, Services Express's Environmental Policy calls for continuous improvement in our environmental management activities. Our internal business and customer facing services are conducted according to this principle and objective, hence we expect all our subcontractors and suppliers to have a firm Environmental Policy aligned to its operations.

We expect all subcontractors and suppliers to be able to communicate their environmental objectives and performance to staff and customers, and that these include reducing waste and consumption of resources (materials, fuel, and energy), recovery and recycling, where feasible.

All Services Express subcontractors and suppliers should have controls and processes in place to ensure that their current and future business activities cause no avoidable adverse environmental impact and that where practical they utilise technologies and materials that will minimise pollution, energy use and waste.

## 6 Whistle Blowing

We would encourage any personnel from subcontractors and suppliers to report any breaches of this Code to their management or where more confidentiality and/or anonymity are required or appropriate, to the Services Express Whistleblowing Report Line on 01234 224276.

Services Express and the law also recognises that in some circumstances it may be appropriate for concerns to be reported to an independent external body such as a regulator or independent helpline. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistle-blowing charity, Public Concern at Work, operates a confidential helpline: 020 7404 6609.

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