# **Bristol Waste Company Standard Suppliers Policies**

### Signature Page

Both parties agree to support, comply with, and accept the terms of the following Bristol Waste Company policies and agreements as notified in the following schedules:

Schedule 1 – General Terms of Engagement

Schedule 2 – Ethical and Environmental Policy

Schedule 3 – Sustainability Policy

Schedule 4 – Human Trafficking Policy

Schedule 5 – Anti-Bribery and Corruption Policy

Both parties acknowledge that the terms of these schedules will remain in effect for the entire duration of any agreement between them and are showing their acceptance by signing below:

The Customer:	Bristol Waste Company Limited
Position/Capacity (Block Capitals):	
Signature:	
Name (Block Capitals):	
Date:	
The supplier:	
Position/Capacity (Block Capitals):	
Signature:	
Name (Block Capitals):	
Date: _	

### Schedule 1 Bristol Waste Company General Terms of Engagement

- 1.1. Discrimination against any person or group based on race, religion, colour, nationality, age, gender, maternity or marital status is not acceptable under any circumstances.
- 1.2. Any form of physical or emotional abuse such as verbal or sexual harassment or threat used to intimidate employees is strictly forbidden.
- 1.3. Employers should not punish or interfere in any way with the employees' right to form or join lawful organisations such as trade unions or be represented by an organisation when requesting to have their work conditions reviewed by management. All employees have the right to choose the company and the role and when to leave a workplace.
- 1.4. Employers are obliged to pay wages including overtime pay which meet the legal minimum wage requirements or local industry standards as defined by current local legislations.
- 1.5. All suppliers must comply with all applicable health and safety regulations relating to working conditions on all working premises. These regulations may include but are not limited to sanitation, fire safety, electrical safety, risk protection and structural safety.
- 1.6. Suppliers are expected to encourage appropriate employee training to ensure employees are aware of the health and safety regulations in their working premises and that they perform their job as best as they can. Suppliers are also expected to enforce disciplinary measures for those employees who are in breach of health and safety regulations.
- 1.7. All suppliers must comply with any Sexual Harassment legislation. The law defines sexual harassment as unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Sexual harassment can be caused by anyone that comes into contact with a colleague because of their job, including those from third parties such as members of the public.

# Schedule 2 Bristol Waste Company Ethical and Environmental Policy

#### Introduction

Bristol Waste Company's commitment is to engage with those suppliers who share our ethical principles and that ensure that their employees, subcontractors and business partners share the same ethical standards. Although sometimes BWC may be purchasing a product or a service from countries which are significantly different in terms of cultural and legal framework, all suppliers must strictly respect the standards below as enforced by international organisations such as the International Labour Organisation (ILO) and the United Nations (UN).

All suppliers must ensure that their businesses are managed sustainably without any damage to the environment. BWC care about the environment and sustainability and are dedicated to supporting a cleaner, greener Bristol, a city where residents, businesses and communities feel involved, informed, and empowered to create a better place for future generations. Therefore, BWC is committed to reducing its impact on the environment and supporting those processes and practices which protect our environment whilst promoting sustainable development.

These include but are not limited to:

- The protection of the environment
- Reduce the amount of residual waste generated and improve the recycling rate to meet the Bristol One City Plan targets.
- Operate in our highly regulated environment and to meeting our compliance obligations.
- Understand and reduce our environmental impacts and prevention of pollution.
- Our Sustainability Policy, including procurement of eco-friendly consumables & equipment.
- Lead by example in our own working practices.
- Employee development and provide opportunities for involvement in our environmental performance in our service and practices.
- Consider the carbon footprint and environmental impact of purchased products and working toward net zero carbon in our services and premises.
- Our environmental objectives and targets in our business plan
- Continual improvement of our systems and our service delivery, to reduce our environmental impact, enhance environmental performance and meet the needs and expectations of our residents and customers.
- Our guiding principles to creating more value from what we do and to Waste Nothing.

All employees and those who act on our behalf are required to adhere to this when undertaking duties. This Environmental Policy Statement is fully supported by the Senior Management team who take responsibility for its delivery.

All Bristol Waste Company's procurement and sourcing decisions are based not only on the quality, level of service, cost, delivery terms and other similar commercial factors but also on the ethical standards of suppliers. Bristol Waste Company is

committed to evaluate the ethical standards of all its activities with suppliers. Bristol Waste Company shall not tolerate any unethical, corrupted or improper activities or behaviour and it is committed to eliminating the risk of bribery and corruption in its supply chain.

# Schedule 3 Bristol Waste Company Sustainability Policy

Bristol Waste Management (BWC) recognises the impact of its activities and the opportunity BWC have to improve their environmental performance and that of Bristol. BWC are committed to sustainability and consider environmental protection, accountability, transparency and inclusivity as a key requirement to sustainable development. This matters to BWC. It includes resource provision, transportation, energy usage, procurement and welfare of staff.

Sustainable development should meet current needs without compromising the ability of future generations to meet their own potential needs, we are therefore committed to:

- helping Bristol become a cleaner, more sustainable city where we waste nothing, recycle, repair, reuse and share goods
- work with Bristol; BWC employees, residents, visitors, organisations, and communities to educate and promote sustainable behaviours around how we consume and manage our resources.
- support the One City ethos within Bristol to reduce the environmental burden on the city and its community.
- help meet the One City Climate Strategy ambitions.
- work towards Bristol Waste being carbon-neutral by 2030 and support the city to do the same
- embed sustainability considerations throughout our decision-making processes.
- lead BWC company values to create innovative ideas, embrace new technology and deliver value for money.
- continue challenging convention and embed essential changes into everyday working practices.
- integrate the UN Sustainable Development Goals throughout our business ambitions.

### Schedule 4 Bristol Waste Company Human Trafficking Policy

#### 1. Introduction

Bristol Waste is a Teckel company wholly owned by Bristol City Council. We operate the waste function for and on behalf of the Council. We are responsible for recycling and refuse collection, household recycling and reuse centres, street cleansing services and the treatment of the waste collected. Following a TUPE transfer in 2021, we also provide cleaning and security services to the city council at its premises and workplaces across the city. The sector in which we operate is attractive to perpetrators of slavery and human trafficking and stopping the practice is an important part of our corporate responsibility.

We are committed to identifying and eradicating modern slavery in our business and supply chain. As a trusted supplier, we expect you to uphold a similarly high standard and to take appropriate steps to combat modern slavery in all its forms. This includes forced labour, servitude, child labour, human trafficking and sexual exploitation, 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.

#### 2. What we expect from you

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. As one of our suppliers, we expect you to take all reasonable steps to ensure that there is no modern slavery in your operation or supply chain. This includes, but is not limited to:

- Having a Modern Slavery Policy or Statement
- Risk assessing the most likely areas of modern slavery
- Training your staff
- Having a whistleblowing hotline (if you operate in an industry at higher risk of slavery)
- Maintaining records of incidents/suspicions and remedial actions taken
- Performing appropriate due diligence on your suppliers

#### 3. Compliance with this policy

Compliance with this policy is mandatory for all of Bristol Waste Company's suppliers. By signing this policy, you are declaring that you comply with all aspects of it. If you wish to seek a waiver for any part of this policy, please contact your Bristol Waste Company account manager, who will escalate to Bristol Waste Company's Procurement team. We reserve the right to terminate or amend our relationship with you if you breach this policy without our consent.

By agreeing to this policy, you also grant us permission to audit you without notice to verify compliance. This could take the form of site visits, interviews, requests for information or any other reasonable requests necessary to evidence compliance, whether performed by ourselves or a 3 <sup>rd</sup> party we commission. You agree to cooperate with the auditor, providing accurate and complete information in a timely manner.	

### **Schedule 5 Anti-bribery and Corruption Policy**

Bribery is illegal and Bristol Waste Company is committed to a zero-tolerance approach to any form of bribery and corruption. As such Bristol Waste Company only works with suppliers who also have a zero-tolerance approach to bribery and corruption. On entering any agreements with Bristol Waste Company, all suppliers should adhere to Bristol Waste Company's anti-bribery policy.

Given Bristol Waste Company's commitment to high ethical standards, all employees and business partners of Bristol Waste Company must comply with any applicable Anti-Bribery and Corruption law (collectively known as 'ABC' laws) and any other rules, orders and legislation that ban bribery, the receipt of bribery and the payment of kickbacks. These laws include but are not limited to the UK Bribery Act, the US Foreign Corrupt Practices Act and ABC laws and regulations applicable in countries where Bristol Waste Company The Serviced Apartment Company Ltd conducts its business. Bristol Waste Company is committed to uphold all anti-bribery and corruption regulations and cooperate with the authorities (including the introduction of policies, processes and procedures) in order to prevent bribery from happening.

Regardless of the differences between the business cultures and traditions of other countries where Bristol Waste Company may operate, Bristol Waste Company does not tolerate any form of bribery. 'Bribery' and 'bribes' are defined as an offer to pay, a promise or intention to pay or a payment of something valuable with the purpose of influencing a decision of a government official's decision in order to obtain a business advantage (such as a commercial, contractual, regulatory or personal advantage). Forms of bribery include money, gifts, travel, entertainment, loans, political and charitable donations, job offers for members of family and friends.

### Responsibilities of suppliers

- to familiarise themselves and comply with this policy and ensure that their employees and subcontracts are familiar with this policy
- to take seriously and investigate at the earliest opportunity any concerns raised or identified where this policy may not have been followed by their employees or subcontractors
- to take corrective action to put right any wrongdoing and ensure that procedures are in place to prevent recurrence
- to monitor such incidents and maintain appropriate records, liaising with relevant authorities when applicable

On entering an agreement with Bristol Waste Company, the supplier must warrant and undertake that:

- It shall not engage in any activities or practices which are not compliant with the applicable ABC legislation
- It shall not implicate Bristol Waste Company in any activity which is an offence under the ABC laws

- It shall not request or take or offer to take on behalf of Bristol Waste Company any payment, offer, gift of any money or anything else of value which constitutes a breach of any ABC laws, promise to pay or payment to any public official or to any other person or party
- It shall keep accurate and complete records, books, and accounts for every business activity which relates to its relationship with Bristol Waste Company
- From time to time and at the reasonable request of Bristol Waste Company, the supplier shall send a written confirmation to Bristol Waste Company that it has been compliant with any anti-bribery and corruption legislation and is able to provide proof of such compliance.

All of Bristol Waste Company's Purchasing decisions are based not only on the quality, level of service, cost, delivery terms and other similar commercial factors but also on the ethical standards of suppliers. Bristol Waste Company is committed to evaluating the ethical standards of all its activities with suppliers. Bristol Waste Company shall not tolerate any unethical, corrupted or improper activities or behaviour, and it is committed to eliminating the risk of bribery and corruption in its supply chain.

On entering an Agreement, the supplier commits to comply with the Bristol Waste Company Modern Slavery Statement and policy and must ensure that its supply chain does not have any form of modern slavery or human trafficking.

- 1.1. In carrying out the supplier's obligations under an Agreement with Bristol Waste Company, the supplier shall comply with all applicable statutes, statutory instruments, codes of practice, guidance notes, byelaws, EU regulations and regulations of any local or other statutory governing or public authority or body, or any other lawfully constituted regulatory body; as amended, extended or re-enacted.
- 2.2. The supplier shall commit to comply with all the anti-bribery and corruption laws and regulations and shall not offer or promise to offer any financial or non-financial advantage to any person or party with the intention of influencing a decision which Bristol Waste Company should benefit from as a result.
- **2.3.** The supplier shall keep appropriate records of all transactions which relate to this Agreement and ensure these are accurate and complete. In case of any breach or breach risk, the supplier shall cooperate with Bristol Waste Company and fully support any investigation.

Through the value of 'Do The Right Thing,' Bristol Waste Company is committed to providing a business that is ethical in its dealings and mindful of its social, legal, and moral responsibilities. This extends to colleagues, suppliers, customers, and the environment within which it operates.

This policy is applicable to all suppliers of all types. It has been written with due regard to fairness, equality and current legislation, to ensure that the Company complies with all its obligations, morally, commercially and legally.

The Company reserves the right to amend or update this policy at any time. It does form part of any supplier's contract for services or supply of goods.

#### Zero-tolerance approach to bribery

No suppliers should give or receive bribes, including facilitation payments for or on behalf of Bristol Waste Company. We value our reputation for conducting business with honesty and integrity. It is vital for us to maintain this reputation as it generates confidence in our business by our customers, clients, investees and other persons – which ultimately means it is good for business.

We do not pay bribes in furtherance of our business and expect that you will not do so on our behalf. We have a zero-tolerance approach towards bribery. A bribe is anything of value that is offered, promised, given or received to improperly influence a decision or to gain an improper or unfair advantage in promoting, enhancing, obtaining or retaining business.

Bribery may not always be in the form of cash payments and may take many other forms, including:

- Non-arm's length loans, forgiveness of debt or other transactions
- Phony jobs or "consulting" relationships
- Employment opportunities or internships
- Political contributions
- Charitable contributions or
- Gifts, travel, and hospitality.

"Facilitation payments" are also a form of bribe and are, therefore, not permitted. Facilitation payments are small payments made to secure or speed up routine actions or otherwise induce public officials or other third parties to perform routine functions they are otherwise obligated to perform, such as issuing permits, approving immigration documents or releasing goods held in customs. This does not include legally required or permitted administrative fees for expedited service.

#### Dealing with public officials

A "public official" is any person who is employed by or is acting in an official capacity for a government, a department, agency or instrumentality of a government, or a public international organisation. This includes elected or appointed persons who hold legislative, administrative or judicial positions, such as politicians, bureaucrats, civil servants, and judges. It also includes persons who perform public functions, such as professionals working for public health agencies, water authorities, planning officials and agents of public international organisations, such as the UN or World Bank. A public official may also include employees of government-owned or controlled businesses, including sovereign wealth funds and state-owned utility companies. For example, if a government has an interest in a bank and exercises control over the activities of that bank, then the banking officials are likely to be considered public officials. Third parties acting at the direction of these entities and individuals should also be considered public officials.

There is increased sensitivity and scrutiny required for dealings with public officials because this has traditionally been an area where bribery activity is more likely to occur. Suppliers should recognise these risks in their dealings and interactions with

public officials and consider how their actions may be viewed. For example, payments, gifts or employment to close relatives of public officials may be treated by enforcement authorities as direct payments to the public officials and, therefore, may constitute violations of law.

Joint venture partners, agents, contractors and suppliers are not permitted to pay bribes on our behalf.

Bristol Waste Company may be prosecuted for failing to prevent bribery by a person associated with it. This includes any individual or Company entity that performs services for or on behalf of the company. Suppliers should avoid doing business with partners, agents and contractors who do not have a zero-tolerance approach to bribery.

This means due diligence should be undertaken on contractors, partners and agents to establish their anti-bribery credentials, where warranted by the assessed level of risk. This could include informing these persons (and associated companies) of the company's antibribery policy, meeting with them to better assess their business practices and anti-bribery and corruption policies/controls and making commercially reasonable inquiries into their reputation and past conduct. In consultation with internal legal counsel, include anti-bribery language in contractor, partner or agency agreements, where appropriate.

Lobbying activities generally include attempts to influence the passage or defeat of legislation, which may trigger registration and reporting requirements. In many jurisdictions, the definition of lobbying activity is extended to cover efforts to induce rulemaking by executive branch agencies or other official actions of agencies, including the decision to enter into a contract or other arrangement.

Suppliers should not solicit or offer donations to guests, clients, suppliers, vendors, public officials or others in a manner which communicates that a donation is a prerequisite for future business or that the offer of a donation is intended to obtain a business advantage.

#### Record-keeping

In addition to prohibiting bribery, some anti-bribery legislation requires proper recordkeeping and the establishment and maintenance of internal controls. The purpose of these provisions is to prevent companies from concealing bribes and to discourage fraudulent accounting practices.

All transactions must be recorded completely, accurately and with sufficient detail so that the purpose and amount of any such payment is clear. No undisclosed or unrecorded funds or assets of the company should be established for any purpose. False, misleading, or artificial entries should never be made in the books and records of the company for any reason.

### Non-compliance with this policy

Disciplinary action will be proportionate to the breach and will be taken seriously. In the most severe circumstances, and, if warranted, legal proceedings may be brought against you.