



## Havebury Housing Partnership

# ETHICAL BUSINESS POLICY

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## 1. PURPOSE

- 1.1. This policy explains the ethical business standards we expect of Havebury and our Suppliers.

## 2. SCOPE

- 2.1. In your everyday working life, you will often experience situations where the “right thing to do” is not immediately obvious. You need to ensure that what you decide to do meets specific ethical standards and complies with the law.

## 3. RESPONSIBILITIES

- 3.1. This policy applies to all Havebury employees, consultants, officers, Board members, agents, or third parties acting on behalf of Havebury including secondees, advisers, agency workers, contractors, and other companies (collectively referred to as “Covered Individuals”). It also applies to Havebury suppliers and business partners who are required in turn to source goods and services in accordance with the standards set out here.

## 4. STANDARDS OF EMPLOYMENT

- 4.1. Standards of employment must comply with the ‘UK Modern Slavery Act’ which forbids the employment of anyone under conditions of: ‘forced labour’, ‘compulsory labour’, ‘slavery’ or ‘servitude’ or the exploitation of any person by ‘human trafficking’, furthermore they must be in accordance with the ‘Ethical Trading Initiative’ (ETI) base code which specifies that companies must, as a minimum, operate to the following standards:
- **Employment is freely chosen**
    - There is no forced, bonded or involuntary prison labour
    - Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.
  - **Freedom of association and the right to collective bargaining are respected**
    - Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
    - The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
    - Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
    - Where the right to freedom of association and collective bargaining is restricted under law the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.
  - **Working conditions are safe and hygienic**
    - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
  - Access to clean toilet facilities and to potable water, and if appropriate sanitary facilities for food storage shall be provided.
  - Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
  - The company observing the code shall assign responsibility for health and safety to a senior management representative.
- **Child labour shall not be used**
    - There shall be no new recruitment of child labour.
    - Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in the appendices to the ETI Base Code at [www.ethicaltrade.org](http://www.ethicaltrade.org) .
    - Children and young persons under 18 shall not be employed at night or in hazardous conditions.
    - These policies and procedures shall conform to the provisions of the relevant International Labour Organisation (ILO) standards.
- **Living wages are paid**
    - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.
    - All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
    - Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.
- **Working hours are not excessive**
    - Working hours must comply with national laws, collective agreements, and the provisions of 6.b to 6.f below, whichever affords the greater protection for workers. Sub-clause 6.b to 6.f are based on international labour standards.
    - Working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week.
    - All overtime shall be voluntary. Overtime shall be used responsibly, considering all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
    - The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.e below.
    - Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances, where all of the following are met:
      - this is allowed by national law

- this is allowed by collective agreement freely negotiated with a workers' organisation representing a significant proportion of the workforce.
  - appropriate safeguards are taken to protect the workers' health and safety
  - the employer can demonstrate that exceptional circumstances apply, such as unexpected production peaks, accidents, or emergencies.
- Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14 day period.

- **No discrimination is practised**

- There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

- **Regular employment is provided**

- To every extent possible work performed must be based on recognised employment relationships established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

- **No harsh or inhumane treatment is allowed**

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

4.2. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

4.3. Further information on the ETI Base Code can be found at: [www.ethicaltrade.org](http://www.ethicaltrade.org) .

## 5. HEALTH & SAFETY MANAGEMENT SYSTEMS

5.1. Effective health and safety management systems must be in place including:

- Hazard identification, assessment, and control
- Training, awareness and competence of health and safety matters
- Emergency preparedness and response planning
- Performance monitoring and continuous improvement
- System structure analysis and responsibility allocation
- Machinery and site vehicles must be designed, maintained, and used safely
- Hazardous materials must be used, stored, transported, and disposed of safely and handling risks minimised or eliminated; and
- Workers must have access to good medical care

- 5.2. Health and safety management systems should be based on a comprehensive and systematic method of assessing and improving performance in the prevention of workplace incidents, accidents and diseases on a continual basis (known as the Deming Cycle or 'plan-do-check-act') for further information see details of the relevant International Labour Organisation practice principles at: <https://www.ilo.org/global/topics/safety-and-health-at-work/normative-instruments/code-of-practice/lang-en/index.htm> .

## 6. ENVIRONMENTAL MANAGEMENT SYSTEMS

- 6.1. All Havebury sites, suppliers (etc) must act responsibly and have appropriate environmental management systems implemented in relation to the following:
- **Waste:** reusing, reducing, and recycling where appropriate.
  - **Raw Materials:** sourced in an environmentally responsible and sustainable way, minimise use of raw materials and re-use where possible.
  - **Water:** protect the environment and local community through responsible use of water resources, conserve and minimise water use in company operations, re-use wastewater where possible, adhere to legal requirements regarding water use and waste water disposal, immediately respond to incidents of contamination.
  - **Pollution:** prevent and minimise pollution (hazardous waste, water pollution, soil contamination, solid waste, light pollution, noise pollution and thermal pollution), treat waste appropriately before discharge, ensure legal compliance and minimise environmental impact, provide immediate and pro-active response to pollution incidents.
  - **Emissions:** comply with all legal requirements governing air emissions, minimise and control air emissions including greenhouse gases (including carbon dioxide), monitor and maintain emissions control equipment and sources of emissions.
  - **Energy:** minimise use of energy and improve energy efficiencies (lighting, production equipment, vehicles, and other uses of energy) where appropriate, use renewable energy if feasible.
  - **Biodiversity:** minimise the biodiversity impact of operations including building, activities, and supply chain.
- 6.2. Havebury expects suppliers to source goods and services in accordance with the human rights and other standards set out in this policy.

## 7. AVOIDING BRIBERY & CORRUPTION

- 7.1. Bribery is the offering, promising, giving, accepting, or requesting an inducement for an action which is improper or a breach of trust. Payments made, gifts, hospitality or other advantages offered or given in these circumstances are likely to constitute bribes. Bribes can be paid by an individual; through a third party (such as an agent or adviser) or by a company itself. Corruption is the misuse of entrusted power for private gain. It usually involves two or more people entering into an agreement to give a financial or other advantage to a public official in the UK or overseas, or to an employee or agent in the public or private sector, to induce that individual to behave improperly.

## **8. SUPPLIER OBLIGATIONS - BEHAVIOUR THAT COULD BREAK THE LAW**

- 8.1. Bribery and corruption are against the law. The Bribery Act 2010 (UK) applies to Havebury, its' UK suppliers and potentially international suppliers and business associates. There are three main offences which are described below. A supplier must ensure that it (or its representatives) does not engage in any behaviour that could be considered to amount to one of these offences:
- promising, offering, or giving a bribe (financial or otherwise) either directly or through a third party
  - requesting, agreeing to receive, or actually receiving a bribe (financial or otherwise) either directly or through a third party; and
  - bribing a foreign public official with the intention to obtain or to retain business or an advantage in the conduct of business.
- 8.2. Havebury employees are not permitted to offer or accept bribes including money or vouchers; expensive gifts; or lavish corporate hospitality. Havebury expects its suppliers to subscribe to the same principles.
- 8.3. The supplier shall comply with all applicable laws, including but not limited to the UK Bribery Act 2010 and shall ensure its representatives do not engage in any activity, practice or conduct which would constitute an offence under sections 1, 2 or 6 of the Bribery Act 2010 if such activity, practice or conduct had been carried out in the UK. The supplier shall have and shall maintain in place its own policies and procedures, including adequate procedures, to ensure compliance with the Bribery Act, and will enforce them where appropriate.