



Havebury Homes

Ethical Business Policy

FIN017

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1. Policy statement

- 1.1 Havebury Homes ("Havebury") is dedicated to ensuring that all goods, works, and services it procures are delivered in a way that promotes fairness, protects human rights, supports safe working environments, and contributes positively to the wellbeing of workers and communities. We expect all Suppliers to uphold ethical labour practices, prevent modern slavery and human trafficking, maintain robust health and safety standards, and operate transparently and without bribery or corruption.
- 1.2 This policy reinforces Havebury's commitment to responsible procurement, environmental stewardship, equality and inclusion, and continuous improvement across all areas of supply-chain activity. We will work collaboratively with Suppliers to achieve these standards and will take appropriate action where breaches occur.

2. Purpose

- 2.1 This Supplier Ethical Business Policy sets out the standards and behaviours Havebury expects from all suppliers, contractors, consultants, agents, and business partners ("Suppliers"). Its aim is to ensure that all goods, works, and services supplied to Havebury are delivered responsibly, transparently, and in line with ethical, social, and environmental best practice.
- 2.2 This policy supports Havebury's commitment to responsible procurement, fair working conditions, equality and inclusion, environmental sustainability, and the prevention of modern slavery, bribery, and corruption.
- 2.3 This policy is designed to support and align to relevant laws, regulations, and standards and strategies, which are:
 - UK Modern slavery Act;
 - Ethical Trading Initiative (ETI) Base Code;
 - International Labour Organisation (ILO) Standards
 - Equality, Diversity & Inclusion (EDI) Strategy
 - Sustainability Strategy
 - UK Bribery Act
 - Modern Slavery Statement

3. Scope

- 3.1 This policy applies to:
 - All Suppliers and their employees
 - Subcontractors, labour agencies, consultants, and any other parties engaged by Suppliers
 - All tiers of the Supplier's supply chain
 - All goods, works, and services supplied to Havebury
- 3.2 Suppliers must ensure their own supply chain complies with this policy and

must maintain appropriate evidence of compliance

4. Responsibilities

4.1 It is the responsibility of the Head of Procurement for monitoring and reviewing the policy.

4.2 Suppliers must:

- Meet all requirements in this policy
- Comply with all applicable UK and international laws
- Cascade these requirements to subcontractors
- Provide evidence or documentation to Havebury upon request
- Report any actual or suspected breach immediately
- Support any reasonable audit, inspection, or verification activity

5. Ethical Labour & Employment Standards

5.1 Havebury requires all Suppliers to comply with the UK Modern Slavery Act, the ETI Base Code, and relevant International Labour Organisation (ILO) conventions.

5.2 Employment Is Freely Chosen

No forced, bonded, or involuntary prison labour.

Identity documents must not be retained, and workers must be free to leave employment with reasonable notice.

5.3 Freedom of Association

Workers must be free to join trade unions, bargain collectively, and participate in representative functions.

5.4 Safe & Hygienic Working Conditions

Suppliers must provide safe working environments, conduct hazard assessments, deliver H&S training, and ensure clean facilities and safe accommodation.

5.5 No Child Labour

No recruitment of children below the legal working age.

No hazardous work for workers under 18.

5.6 Living Wages

Wages must meet or exceed national legal minimums or industry benchmarks. Deductions must not be used as disciplinary measures.

5.7 Working Hours

Working hours must comply with national law and ILO standards. Overtime must be voluntary and paid at a premium rate.

5.8 No Discrimination

No discrimination is permitted in hiring, pay, training, promotion, or termination on the basis of any protected characteristics.

5.9 Regular Employment

Employment must be based on recognised and lawful employment relationships.

5.10 No Harsh or Inhumane Treatment

Abuse, harassment, intimidation, or threats are prohibited.

6. Fair Pay & Real Living Wage Commitment

6.1 Havebury is working towards Real Living Wage accreditation, which requires all directly employed colleagues and, where possible, regular Suppliers to be paid at least the Real Living Wage.

6.2 To support this:

- Suppliers involved in ongoing or routine service delivery will be informed of Havebury's Real Living Wage commitment during procurement and contract-management activities.
- Future procurement and contract arrangements will expect Suppliers delivering regular services to align with Real Living Wage pay standards for the workers they deploy to support Havebury.
- Suppliers are encouraged to assess and, where necessary, improve their pay structures to ensure that workers engaged on Havebury contracts receive fair and transparent remuneration.
- Where full alignment cannot be achieved immediately, Suppliers must work with Havebury to establish a realistic transition plan.
- Suppliers must not use subcontracting or labour-only arrangements to undermine fair pay or avoid Real Living Wage principles.

6.3 This commitment reflects Havebury's broader focus on ethical employment, social value, and responsible supply-chain practices.

7. Equality, Diversity & Inclusion (EDI)

7.1 Suppliers must:

- Provide equal employment opportunities
- Prevent harassment, bullying, and victimisation
- Make reasonable workplace adjustments for disabled workers
- Uphold fair and inclusive recruitment and development practices

7.2 This aligns with the principles of the UK Equality Act.

8. Health & Safety Management Systems

8.1 Suppliers must maintain effective health and safety systems including hazard identification, emergency preparedness, worker training, performance

monitoring, and continuous improvement, following the Deming Cycle where relevant.

9. Environmental Responsibility

9.1 Suppliers must act responsibly to minimise environmental impacts, including:

- Reducing waste and maximising recycling
- Sourcing raw materials responsibly
- Managing water use and preventing pollution
- Reducing emissions, including greenhouse gases
- Improving energy efficiency and using renewables where feasible
- Protecting biodiversity and ecosystems

9.2 These expectations align with modern ESG and Net Zero standards.

10. Anti-Bribery & Anti-Corruption

10.1 Suppliers must comply with the UK Bribery Act 2010 and must not engage in bribery, corruption, inducements, or improper advantage. Adequate anti-bribery procedures must be in place.

11. Reporting Concerns & Whistleblowing

11.1 Suppliers must provide safe and confidential mechanisms for workers to report concerns. Havebury will make available reporting routes for concerns relating to breaches of this policy, unethical behaviour, modern slavery risks, and bribery.

11.2 Retaliation against whistleblowers is prohibited.

12. Monitoring, Compliance & Audit

12.1 Havebury may undertake due diligence including:

- Supplier questionnaires and declarations
- Site visits or remote audits
- Worker interviews and document reviews
- Corrective action plans where required

12.2 Non-compliance may result in suspension, removal from approved supplier lists, or contract termination.

13. Subcontractor Management

13.1 Suppliers must ensure that subcontractors comply with this policy, including ethical labour, environmental, and anti-bribery requirements. Suppliers are responsible for monitoring and managing subcontractor performance and risks.

14. Continuous Improvement

- 14.1 Havebury encourages Suppliers to work beyond minimum compliance and demonstrate continuous improvement in labour standards, environmental management, and ethical business conduct.

15. References

| Related External Documents | |
|--|---------------------------------------|
| Reference | Link to reference |
| <i>UK Modern Slavery Act</i> | UK Modern slavery Act |
| <i>Ethical Trading Initiative (ETI) Base Code</i> | ETI Base Code |
| <i>International Labour Organisation (ILO) standards</i> | ILO standards |
| <i>UK Bribery Act 2010</i> | UK Bribery Act |
| Related Internal Documents | |
| Sustainability Strategy | |
| Equality, Diversity & Inclusion (EDI) Strategy | |
| Modern Slavery Statement | |
| Anti-Bribery & Corruption Policy (FIN013) | |

16. Document control

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