

# Places for People Supply Chain Code of Conduct



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We are fortunate enough to work alongside some of the best suppliers in the country. Thankfully all of you share our vision, what we expect of you is set out in this **supply chain code of conduct**.



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## Introduction from David Cowans

Welcome and thank you for being a supply chain partner to Places for People. You are supplying one of the largest property management, development and regeneration companies in the UK and you will quickly see how very different we are from other housing groups.

We are committed to delivering sustainable supply chain solutions through a creative and collaborative approach. We are keen to work with supply chain partners to develop innovative ideas and products and have developed our own frameworks for the housing sector which demonstrate how collaborative procurement can achieve greater efficiency to ensure value for money, as well as access to market expertise and continued improvement in services.

Not only do we build and manage homes, we provide job and training opportunities, support new and existing businesses, offer financial products such as mortgages and loans and provide specialist care and support services that enable people to live independently in their own home.

We provide leisure facilities, through Places for People Leisure, and have expanded our market rent offering through Touchstone Corporate Property Solutions and Residential Management Group (RMG).

We are passionate about continually seeking opportunities to offer better customer service and value for money.

Our success is driven by the hard work and talents of our people and supply chain partners. One of our key aims is to consider carefully how our procurement activity can create maximum benefit for our customers and the communities in which we work.

I am sure you will find working with Places for People rewarding and challenging and hope that you become as proud as I am to be involved with a Group which makes such a positive difference to the lives of thousands of people across the country.



David Cowans  
Group Chief Executive



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If you have been selected to be a Places for People supply chain partner your standards will undoubtedly be as high as ours. We only work with businesses whose values are consistent with our own.

This document sets out what is expected of you and what you can expect from us in return. We appreciate that you will have your own values to guide you, we don't expect you to adopt ours, but we do ask that you understand and respect them.

# Values and behaviours — SPIRIT

What we do and how we do it is important to the success of achieving our vision of working to provide aspirational homes and inspirational places.

Places for People embrace SPIRIT values which underpin the behaviours, practices and approach which we want to see demonstrated by our supply chain partners as part of delivering their contracts with us. They clearly illustrate what we expect from you as a supply chain or joint venture partner.

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## Support

### Our principle “We support everyone for doing the right thing”

- Recognise when and how customers and colleagues need help.
- Proactively offer resources to help.
- Work collaboratively, remove barriers and resolve issues.
- Listen to and address others’ concerns.

## Positive

### Our principle “We positively embrace difference”

- Focus on what ‘I CAN DO’ for customers and colleagues.
- Identify options, alternatives and solutions.
- Express positive expectations and encourage individuals to achieve.
- Celebrate and publicise achievements and successes.

## Integrity

### Our principle “We always strive to do what is right”

- Deliver on promises and ensures actions are in line with words.
- Be open and honest about the reality of situations, providing information and explanation.
- Find appropriate opportunities to give feedback directly to individuals and addresses non-performance.

## Respect

### Our principle “We truly value the skills and abilities of others”

- Treat people equitably and fairly.
- Value individual differences and contribution.
- Take time to understand implications and impact of work requests on others’ workload and agree priorities.

## Innovative


### Our principle “We look forward to finding solutions to problems”

- Be open and responsive to new ideas.
- Be prepared to pilot and ‘fail’ to learn and progress.
- Have courage and insight to challenge historical approaches and influences and lead change.

## Together

### Our principle “We are better together”

- Recognise value in working cross functionally and involving others.
- Believe more can be achieved by working effectively together.
- Understand the wider picture.



Remember:  
The decisions  
you make  
will affect our  
customers

# Main principles

## Human Rights, Diversity and Equality

As we do, we expect all of our supply chain partners to conduct their business to a high ethical standard and comply with legislation relevant to the business.

This especially applies to:

- **Respect for our People and Communities**

— treat everyone equally and value diversity, appreciate the skills and abilities of others, put something back into the community, seek to employ local people where possible and take into account the concerns of the wider community.

- **Discrimination** — support equal pay for work of equal value, oppose discrimination or intimidation including all forms of threats of physical or psychological abuse.

- **Child Labour** — comply with child labour laws and not employ anyone under the age of 15 or where it is higher the local mandatory school leaving age in the local country.

- **Compensation and Working Hours** — comply with national laws and regulations regarding working hours, wages and benefits.

- **Communications** — be honest and transparent; use different ways of communicating taking into account peoples' needs, language and literacy.

## Modern Slavery Act 2015

Comply with obligations in the Modern Slavery Act including refraining from using forced, involuntary or debt bonded labour. All supply chain partners must make sure their own supply chains are slavery free. Those with a turnover of £36 million or above are obliged to produce and publish a slavery and human trafficking statement every financial year, detailing any steps it has taken to ensure these illegal elements are not present in their business or supply chain.

## Blacklisting

Blacklisting is the practice of systematically denying individuals employment on the basis of information, accurate or not, held in some kind of database.

Supply chain partners should not compile, use, sell or supply a prohibited list that has been compiled with a view to being used by employers or employment agencies for the purposes of discrimination in relation to the treatment of workers.

## Health, Safety and Wellbeing

An essential element of the Group's business model is the provision of high standards of health, safety and wellbeing across all our activities.

As part of this model, we expect all supply chain partners to work with us to uphold these values and standards, and implement systems that protect all employees, customers and others who are affected by our business activities.

Working together, to agreed standards, will ensure that we create an environment that is safe and conducive to good health and wellbeing and prevents accidents, injuries and work related illnesses.



# Main principles

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## Environmental

Environmental issues are now high on the political agenda and are supported by a range of new policies, legislation and other requirements. At the same time, energy, transport and waste costs have already risen and are likely to continue to rise in the long term.

Places for People is a large and diverse organisation that operates throughout the United Kingdom. We recognise that our operations have a range of impacts on the environment and we are working to minimise them wherever possible.

We will work with our staff, partners, suppliers and contractors to help them reduce their own impacts and the impacts from the products and services they supply to us and our customers.

We will continually strive to improve our environmental performance and we expect our supply chain partners to support us by:

- Ensuring compliance with existing and future legislation and having processes in place to ensure they comply.
- Identifying, measuring and reducing any harmful environmental effects which may arise from business activities through clear environmental objectives and targets.
- Understanding and minimising the CO<sub>2</sub> emissions which arise from activities, services and products supplied to us, including but not limited to waste, energy and transport.
- Minimising, re-using and recycling materials wherever practicable and disposing of waste to landfill only as a last resort.
- Providing environmental training for staff, and encouraging them to apply good environmental practice, both at work and at home.

As we are an ISO14001 and ISO50001 certified organisation; we believe in supporting and encouraging our supply chain partners to do the same by implementing an Environmental and/or Energy Management System which is comparable with the requirements of the ISO14001 and ISO50001 standard.

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## Sustainable Development

Places for People has identified that it has a leading role to play in terms of sustainable development and neighbourhood management. We recognise that our procurement decisions for goods, services and works have a major social, economic and environmental impact, both locally and globally.

Places for People will therefore strive to:

- Challenge the need for consumption of goods and services as a precursor to use and promote the use of recycling and reuse of materials wherever possible.
- Consider costs/benefits of environmentally preferable goods and services as alternatives, where possible taking the total cost ownership (including environmental factors) into account in the procurement decision making process.
- Gather environmental management data on goods and services including CO<sub>2</sub> emissions.
- Determine the environmental and corporate risks to the organisation in developing a sustainable supply chain whilst being committed to working with our supplier base.
- Identify commodities and supply chain partners that are strategic to Places for People's sustainable procurement programme.
- Work with supply chain partners to reduce the environmental impacts of goods and services supplied to Places for People.



Environmental sustainability is high on our agenda



# Main principles

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## Community Benefit

Places for People is committed to community benefit and encourages its supply chain partners to contribute to this by partaking when required in the following activities:

- Recruitment & training of economically inactive people.
- Promoting equality in the workplace.
- Opening up opportunities for small organisations in contract delivery areas, such as SME, Third Sector Organisations and Supported Factories & Businesses.
- Ensuring that disadvantaged groups are represented in the supply chain through working with these smaller organisations.
- Making a positive impact on the environment.
- Contributing to local community in terms of education, regeneration & community engagement.

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## The Social Value Act 2012

The Social Value Act 2012 places a requirement on Places for People to consider the economic, environmental and social benefits of approaches to procurement before the process starts. When the Act applies, suppliers will be informed of the requirements in the procurement documents.

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## Prompt Payment

Places for People has committed to promptly pay all of its contracted suppliers within 30 days, in full accordance with regulation 113 of The Public Contracts Regulations 2015.

A further consequence of regulation 113 is that any suppliers to Places for People must ensure that they promptly pay any sub-contracted suppliers who perform or undertake any element of sub-contracted work relating to contracts with Places for People, within the mandatory 30 day period. This is not only a legal requirement

under The Public Contracts Regulations 2015, but also a mandatory requirement for any supplier working with Places for People, to support prompt payment of its wider supply chain. Further information of the Prompt Payment requirements of Regulation 113 of The Public Contracts Regulations 2015 can be found [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/427237/4278-15\\_Prompt\\_Payment\\_Lord\\_Young\\_Guidance\\_v2c\\_1.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/427237/4278-15_Prompt_Payment_Lord_Young_Guidance_v2c_1.pdf)

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## Open and Fair Competition

Places for People believe in open and fair competition and comply with competition laws and expects supply chain partners to do the same. Supply chain partners should not engage in any anti-competitive practices including price fixing, bid rigging and market sharing or cover pricing.

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## Bribery and Corruption

Bribery is offering, providing or receiving something of value as an inducement or reward for something improper. Corruption involves any of these activities: bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement and money laundering.

Supply chain partners must never offer, give or receive bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any improper advantage. The supplier shall comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010.

Places for People's employees and board members would not accept inappropriate offers of gifts and hospitality in line with the Group's Gifts, Hospitality and Personal Interests Policy.

Always question if it is a gift or a bribe, if you are unsure, just ask





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## Information Security

Places for People has implemented an Information Security Management System (ISO27001) and as such we ensure that our information assets are handled responsibly and managed securely.

Any confidential information must not be obtained or sought by the supply chain partner outside of what is reasonably expected within the agreed business relationship. In addition, our supply chain partners must never disclose confidential information without prior written permission from us. In which case, we expect that any disclosure of such information shall be provided only on a need to know basis and in accordance with applicable regulations, data privacy laws and prevailing industry practices.

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Supply chain partners should encourage their own supply chain partners to adhere to the ethical standards, human rights, health and safety standards and environmental standards upon which this code is based.

If you have a serious concern that something may not be consistent with this code, please let us know. We encourage you to raise any concerns or questions you have in confidence. Please contact the Strategic Procurement Team at Places for People.

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