



INTRODUCTION

WHY A SUPPLIER CODE OF CONDUCT?

Moat Homes is a Housing Association, owning over 23,000 homes in the South East.

Our social purpose is to provide safe and affordable homes that make a real and lasting difference by supporting wellbeing, opening opportunities and helping customers and communities to thrive.

We have produced this Supplier Code of Conduct to clearly set out the principles we expect all suppliers to adhere to when they are working with us, to ensure that together we strive to committed provide an excellent service to all of our customers and stakeholders.

WHAT DOES THIS MEAN IN PRACTICE?

Moat procures a range of goods, services and works to support us in delivering our objectives. We expect our suppliers to take responsibility for ensuring that they, their staff and any sub-contractors adhere to the principles set out in this Supplier Code of Conduct.

- We will work with our partner organisations to jointly develop policies to ensure a consistent service delivery.

- We will ensure that our specific requirements are relevant and proportionate to the size of your organisation and the services you are providing.
- We are committed to developing successful partnerships with our suppliers by being fair and transparent; working collaboratively to improve social, environmental and ethical standards; and helping to develop working relationships based on mutual benefits and shared commitment to continuous improvement and look forward to working with you.

Thank you for playing your part in helping us to deliver our vision in a responsible and sustainable way.

KEY PRINCIPLES

AS A PARTNER ORGANISATION, WE REQUIRE YOU TO ADHERE TO THE FOLLOWING KEY PRINCIPLES:

- Comply with all applicable laws, regulations and standards, including regulations relating to working hours and minimum wages
- Comply with all of the obligations of the Modern Slavery Act 2015, taking proportionate steps to identify and reduce the risks of child labour and modern slavery in your supply chain
- Comply with all health and safety legislation relevant to the goods, works or services you are providing
- Operate with honesty, transparency and integrity ensuring compliance with relevant legislation including the Bribery Act 2010, the Money Laundering Regulations 2017 and the Criminal Finances Act 2017
- Adhere to all applicable legislation in relation to premises and product fire safety standards
- Promote equal opportunities for all and embrace diversity in the workplace
- Recognise and respect the diverse needs of individuals
- Take all reasonable steps to prevent harassment, including sexual harassment, within your organisation and in connection with services delivered on behalf of Moat. This includes maintaining a zero-tolerance approach, clear policies, and effective action where concerns arise
- Actively take steps to reduce the environmental impacts of your products or services
- Be proactive in relation to the wellbeing of your employees
- Provide a safe working environment for your employees and those affected by your business activities
- Notify Moat of any serious incidents relating to harassment, including sexual harassment, where these may impact our customers, colleagues, or reputation.
- Adopt fair and ethical employment practices
- Comply with privacy and data protection laws as well as requirements relating to information, physical, personnel and cyber security

DIGNITY, RESPECT AND PREVENTION OF SEXUAL HARASSMENT

We expect you to create and maintain a working environment where everyone is treated with dignity and respect.

You must take proactive steps to prevent sexual harassment and all forms of inappropriate behaviour when working with us or our customers.

This includes:

- Having clear and up-to-date policies that specifically address sexual harassment
- Taking reasonable steps to prevent harassment before it occurs, not just responding after the event
- Providing training to your colleagues and subcontractors so they understand expected behaviours
- Ensuring there are safe, accessible ways for people to raise concerns
- Taking all complaints seriously and acting promptly and fairly
- Protecting individuals from victimisation when they raise concerns
- Addressing risks of harassment from third parties, including customers, residents, or others

You must work with us to ensure that our customers, colleagues and communities are safe and treated with respect at all times – and ensure that all interactions with customers are free from any form of harassment, including sexual harassment, and that appropriate action is taken where risks are identified

Additionally, we require our partner organisations to comply with the following principles:

CUSTOMER CARE

Moat always strives to ensure that partner organisations it works with are committed to providing an excellent service to all customers and stakeholders. Moat views its customers, irrespective of tenure, as its customers.

Moat and its partners aim to provide customers with a quality, efficient and effective service. We treat all customers fairly and work in a professional manner in and around their homes. We also:

- a) ensure that we deal with customer issues and complaints in a consistent and positive manner.
- b) use complaints and compliments to improve and maintain excellent service delivery to our customers.
- c) meet all statutory and regulatory guidelines when dealing with customer service and satisfaction.
- d) respect the confidentiality of customers at all times.

Moat hopes to develop joint customer care policies and procedures with its partner organisations to ensure a consistent service. Moat reserves the right to request that all partner organisations follow Moat's customer care guidelines and policies where appropriate.

PARTNER ORGANISATIONS COMMUNICATIONS PROTOCOL

Whilst working with Moat you may be contacted or have enquiries from the media and the public in connection with any works or service contracts. Moat's communications with the press and external third parties are managed by Moat's Communications Team Manager. Moat will handle all enquiries from the media or the public relating to their services. We may, without contacting the contracting organisation and where appropriate, provide factual information to the media and the public based on information provided by the contracting organisation.

We require our partner organisations to:

- a) inform us of any media approaches or enquiries made to you regarding Moat or our services.
- b) inform us of any media press releases or articles that you wish to release regarding Moat and our services prior to release.
- c) provide factual information to Moat for issue to the media and the public and update this information as required.

- d) contact Moat's Media Manager by phone or email with requests from the media to photograph or film at any Moat property.
- e) ensure that all of its staff and sub-contractors or other agents are required to comply with the content of this protocol so far as relevant to the performance of the contract duties of the Contractor.

SUSTAINABILITY AND THE ENVIRONMENT

Moat works to ensure that its partner organisations strive to work in a sustainable manner and understand the impacts of their operations on the environment. Any partner organisation of Moat fully accepts all of its statutory responsibilities in this area. They also commit to:

- a) ensure that the company and staff are aware of all the statutory and industry specific Environmental legislation and that it is understood and complied with.
- b) implement procedures and ways of working to reduce the impacts of its operations on the environment.
- c) take environmental factors into consideration when developing new products or services.
- d) monitor and gather information on the environmental impacts of the company where possible.
- e) Strive to reduce waste and consumption of natural resources.
- f) co-operate in any investigations concerning hazardous waste or incorrect disposal of waste.

Moat looks to work with partner organisations who work towards these objectives and seek to operate in an increasingly sustainable manner, working towards a goal of achieving net-zero carbon emissions.

HEALTH AND SAFETY

Moat considers the safety of its customers, staff and the general public to be of utmost importance. To support this, we require that all of our partner organisations have the appropriate Health and Safety policies and procedures in place.

As a partner organisation to Moat these policies and procedures must be provided on request and resupplied whenever they are updated or amended.

Any partner organisation of Moat fully accepts all of its statutory responsibilities and takes practicable steps to ensure these are embedded fully within their organisations. They also commit to:

- a) ensuring the company and staff are aware of all the statutory and industry specific Health and Safety legislation and that it is understood and complied with.
- b) ensuring all staff actively work towards minimise and reduce risk through the implementation of comprehensive risk assessments.
- c) ensuring all staff have the appropriate level of training, experience and adequate equipment to carry out the tasks they are employed for.
- d) ensuring all instructions, guidance and training materials are readily available for staff.
- e) ensuring that personal protective equipment is worn when appropriate.
- f) refraining from misuse or interference with anything relating to Health and Safety which may endanger themselves or others.
- g) reporting accidents, incidents, dangerous occurrences and near misses in accordance with accident reporting procedures.
- h) drawing to the attention of their clients any hazardous or potentially hazardous situations, practises or equipment so that the appropriate steps can be take.
- i) ensuring there are adequate monitoring and reporting systems for the handling of complaints, concerns and general health and safety matters.
- j) be able to demonstrate the steps you are taking to prevent harassment, including training, communication, and review of risks.

Moat reserves the right to carry out a full Health and Safety audit of partner organisations giving a minimum of 5 working days' notice. Where a partner organisation cannot demonstrate adequate Health and Safety policies, procedures or working practices Moat reserves the right to suspend or cancel any contracts or instructions to work.

COMMUNITY

Moat is committed to working in a way which improves the life chances of those within its local communities. We expect our partner organisations to actively support us in our ambitions, as well as making a positive impact within their own local communities.

We anticipate that different approaches will be taken by our partner organisations to reflect the diversity of our suppliers and of all communities, but examples of good practice in this area may include:

- Providing support to charitable causes
- Offering initiatives and opportunities for young people and encouraging social mobility
- Putting support in place for your employees to fundraise or volunteer

PRIVACY, DATA PROTECTION AND CYBER SECURITY

Moat seeks to ensure that we appropriately protect the people, information and assets affected by our work activities. This includes information relating to our employees and customers, as well as other confidential data and systems.

We require our partner organisations to work with us to protect individuals and Moat from risk associated with security matters and to have appropriate policies and procedures in place.

Any partner organisation of Moat fully accepts all of its statutory responsibilities and takes practicable steps to ensure these are embedded fully within their organisations. They also commit to:

- a) ensuring the company and staff are aware of relevant statutory and industry specific data protection legislation and that it is understood and complied with
- b) ensuring all staff actively work towards protecting confidential information
- c) notifying Moat if becoming aware of any security incident that may impact on Moat's staff, customers, data or assets.

MODERN SLAVERY ACT

Moat is committed to ensuring that no modern slavery activities are carried out anywhere in its supply chain and requires its suppliers to uphold the same values and employment practices, in particular:

Forced or involuntary labour

Workers shall not be subject to any form of forced, compulsory, bonded, indentured or prison labour. All work must be voluntary, and workers shall have the freedom to

terminate their employment at any time without penalty, given notice of reasonable length.

Recruitment fees

Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.

Document retention

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation (e.g. passports) is strictly prohibited. The retention of personal documents shall not be used as a means to bind workers to employment or to restrict their freedom of movement.

Contracts of employment

Written contracts of employment shall be provided to migrant workers in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and other working and employment conditions. Migrant workers shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.

Deposits

Migrant workers shall not be required to lodge deposits or security payments at any time.

Humane Treatment

The workplace shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of workers; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour. The use or threat of physical or sexual violence, harassment and intimidation against a worker, his or her family, or close associates, is strictly prohibited.

Workplace Equality

All workers, irrespective of their nationality or legal status, shall be treated fairly and equally. Migrant workers shall benefit from conditions of work (including but not limited to wages, benefits, and accommodations) no less favourable than those available to country nationals. Migrant workers (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.

Wages and benefits

All workers shall be paid at least the minimum wage required by applicable laws and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to workers, in accordance with national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorized by national law are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of workers. Clear and transparent information shall be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. All workers must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure, or to keep workers tied to the employer or to their jobs. Workers shall not be held in debt bondage or forced to work in order to pay off a debt. Deception in wage commitments, payment, advances, and loans is prohibited.

Grievance procedure

An effective grievance procedure shall be established to ensure that any migrant worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

Working hours

Workers shall not be forced to work in excess of the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week, and total working hours including overtime shall not exceed sixty. All overtime shall be purely voluntary, unless part of a legally recognized collective bargaining agreement. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas.

Freedom of movement and personal freedom

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises, such as employer- or recruiter-operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom. Mandatory residence in employer-operated facilities shall not be made a condition of employment.

Private employment agencies and labour recruiters

Companies should hire migrant workers directly whenever possible. When the subcontracting of recruitment and hiring is necessary, companies shall ensure that the labour agencies they engage operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places workers at risk of forced labour or trafficking for labour exploitation.

SPECIFIC REQUIREMENTS

Depending on the nature and value of the goods, works or services you are providing, Moat may require additional specific requirements and controls to be delivered in addition to those described within our Supplier Code of Conduct. In compliance with our Procurement Policy around transparency, these will be included within the relevant tender documents.

DECLARATION

I/We acknowledge that we have read and understood the above Moat Code of Conduct for Partner Organisations and agree to support Moat in delivering against the values and behaviours mentioned herein.

Company:	
Address:	
Telephone:	
Contact Name:	
Email:	
Signature:	
Date:	