



Pension Protection Fund

Supplier and Buyer Code of Conduct

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Introduction

Our duty is to protect the millions of people who belong to UK defined benefit (DB) pension schemes. When these schemes fail, we're here to support their members. Our suppliers enable the work we do and with their collaboration, we are able to carry out our mission to help protect people's futures. We know the work we do matters and we care about making a difference.

We pride ourselves on living our **ICARE** values and our values form a key part of our commitment to members, our stakeholders and to each other:

We act with **integrity** and we 'do the right thing'

We encourage **collaboration** and we 'work as one'

We are **accountable** for our actions and we 'own every outcome'

We hear and **respect** every contribution and we 'value each voice'

We demonstrate **excellence** and we 'work at our best'

We aim to be an employer of choice and in order to serve our members, and attract and retain the right people to help us achieve our mission, fostering diversity and inclusion is a priority for us. It is critical for us to foster a culture where people feel respected, appreciated and valued for their differences and individuality. We promote, support and embed diversity of thought across all levels of the organisation. We set high standards of social, ethical and environmental conduct and within this code, we are encouraging our suppliers to act in a same accountable manner.

With PPF's core principles in mind, and recognising that we are a Public Corporation so part of government service delivery to the public, we set ourselves high standards and expect high standards from our suppliers and contractors.

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Purpose

Scope

HM Government has set out in detail in the [Supplier Code of Conduct](#) what is demanded from all government suppliers and why:

“The public expects that government and its suppliers will look after their interests and deliver on the promises that they make. They expect that suppliers will behave ethically and treat the end users of their service, employees and subcontractors fairly and with respect. Suppliers also expect that government will be fair and transparent in its dealings with them. It is important to publicly state these expectations in a code of conduct and recognise the joint nature of public service delivery. Suppliers are an extension of government’s business, and employees of suppliers interact with citizens and businesses on our behalf every day. This Supplier Code of Conduct strengthens the principles of working together, and is intended to help suppliers and those working in government understand the standards and behaviours that are expected when working on a government contract”

This Supplier Code of Conduct sets out the minimum standards we expect from suppliers and from our own staff. The Code of Conduct includes the following areas:

Society and Human Rights

- Suppliers must comply with all applicable human rights and employment laws and this includes the [Modern Slavery Act 2015](#).
- Suppliers will ensure that all work is completed voluntarily and without slavery, servitude, forced or compulsory labour and human trafficking. Workers must have freedom to leave employment without penalty on the provision of reasonable notice.
- The use of physical abuse, verbal or sexual harassment or intimidation of workers must be prohibited by suppliers.

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- Suppliers must promote a workplace free from discrimination, harassment and victimisation. Our employees and those of our suppliers have the right to respectful treatment in hiring, compensation, access to training, promotion and termination, regardless of and not limited to: age, disability, diversity of thought, gender, race, ethnicity, sexual orientation and socio-economic background.
- Suppliers must provide for working hours that comply with national laws and industry standards. Working hours should be fully compensated, not excessive and with overtime as voluntary.
- Suppliers are expected to have in place appropriate whistleblowing arrangements for concerns of practices that violate laws, regulations or company values. Workers should be able to speak out freely and their concerns be addressed and resolved without fear of retaliation. Suppliers, subcontractors and their workers can also raise concerns via the PPF whistleblowing process if appropriate.
- Suppliers must provide a confidential means for workers to raise grievances and workplace concerns. Workers must be informed clearly how the scheme operates and how grievances will be assessed and feedback provided.
- Suppliers are expected to provide workers with a healthy and safe working environment. Suppliers are to have in place proactive measures to prevent accidents and all applicable health and safety policies; procedures and guidelines adhered to.

Ethical responsibilities

- PPF has a zero tolerance to bribery or corruption in any form. Suppliers must adhere to the [Bribery Act 2010](#) and anti-corruption and financial crime laws. Should any practice be suspected or uncovered, suppliers should inform us immediately and our Compliance and Ethics team is contactable at Compliance@ppf.co.uk

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Suppliers are expected to have an appropriate Anti-Bribery policy in place and are not permitted to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given. PPF employees are not allowed to accept any such advantage and we expect the same approach in our dealings with our suppliers.

- Suppliers are expected to have an appropriate Conflict of Interest policy to which they must adhere to, and to notify PPF of any real or potential conflict of interest.
- Suppliers will comply with:
 - (i) all applicable personal data legislation at all times; and
 - (ii) all provisions in its contract with the PPF relating to personal data, confidential or restricted information.

Environmental impacts

We encourage our suppliers to:

- carry out operations with care for the environment, be aware of and comply with all relevant environmental legislation and to support sustainability through the adoption of [good operating practices](#). In particular, suppliers should aim to manage resources responsibly and seek innovative solutions to reduce their impact on the environment.

The PPF Commitment

- We will invest appropriately in our relationships with our suppliers and aim to create the right environment to allow for innovation, continuous improvement and trust.
- We will communicate our commitment to the [Government Supplier Code of Conduct](#) to our employees and our suppliers. We ask our suppliers effectively communicate the code to their workers, sub-contractors and to any third parties working on a PPF contract.

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- We will pay 100% of undisputed, valid invoices which are supported by a Purchase Order within 30 days of receipt. You must also pay your subcontractors working on PPF contracts within 30 days.

We ask suppliers to speak out and promptly inform PPF, if either we, they, their sub-contractors, or any of their third-parties are not upholding the values embedded in this Supplier Code of Conduct. Concerns can be raised in confidence at: CommercialServices@ppf.co.uk or by contacting our Compliance and Ethics team at: Compliance@ppf.co.uk. Alternatively, DWP provide [Whistleblowing guidance](#) and details of other bodies to whom you can make a disclosure.

Protecting People's Futures

The Pension Protection Fund is a statutory fund run by the Board of the Pension Protection Fund, a body corporate, under the Pensions Act 2004
