

## **SUPPLIER CODE OF CONDUCT**

### **PURPOSE**

Brock University is committed to sourcing in an ethical, legally compliant, and socially responsible manner. The University expects its Suppliers to adhere to equivalent standards.

The purpose of this Supplier Code of Conduct is to outline the minimum standards expected of Suppliers and their subcontractors who provide goods and/or services to the University. Wherever possible, the University expects that Suppliers will work proactively towards exceeding industry standards and best practices and encourages their subcontractors to also meet the standards outlined in this Code of Conduct.

### **SCOPE**

This Supplier Code of Conduct applies to all persons or other legal entities who provide goods and services to Brock University (“Suppliers”).

The University expects all its Suppliers to affirm their compliance with the standards in this Supplier Code of Conduct and ensure the standards are being upheld by any of their subcontractors, manufacturers, and/or sources of goods.

### **STANDARDS**

#### **STANDARD 1 - ENVIRONMENTAL RESPONSIBILITY**

Suppliers shall operate in an environmentally responsible and resource-efficient manner in accordance with existing legislation, applicable regulations and best practices. Suppliers should, wherever possible, proactively undertake initiatives to promote greater environmental responsibility within their own organization and their suppliers by:

##### **1.1 Reduce greenhouse gas consumption**

Suppliers shall strive to reduce greenhouse gas emissions wherever possible. Suppliers should develop processes to monitor, measure and evaluate their emissions to contribute to the University’s Net-Zero targets.

##### **1.2 Reduce waste**

Suppliers will establish and maintain robust systems for safely handling, storing, reusing, and properly managing waste, wastewater, and air emissions. These systems shall prioritize protecting human health and biodiversity, while ensuring compliance with all relevant environmental regulations and standards.

### 1.3 Promote biodiversity and responsible resource management

Natural resources shall be used in an environmentally sustainable way including the avoidance of practices which contribute to deforestation and to refrain from conducting activity in areas that have high biodiversity value.

## STANDARD 2 - SOCIAL RESPONSIBILITY

Suppliers shall at all times uphold the human rights of employees, communities and vulnerable populations. Suppliers must ensure the following:

### 2.1 Human rights

Suppliers shall support human rights conventions and ensure at all times that they are not willfully or passively compliant in human rights abuses. Where an abuse is discovered, Suppliers must notify the University and immediately seek to remedy the abuse.

### 2.2 Prohibition of child labour

The University does not tolerate child labour. The University expects Suppliers to abide by, at a minimum, the *Fundamental standards of the International Labour Organization's (ILO)*. In instances where there are differences between local legislation and the ILO, the higher age shall be followed. In absence of local laws, Suppliers shall abide by the ILO regulations. Where a child worker must be displaced, adult family members should have the opportunity to assume the child's position to maintain family livelihoods.

### 2.3 Prohibit all forms of forced/involuntary/indentured labour

The University does not tolerate the use of forced, involuntary or indentured labour. The University expects Suppliers to abide by, at a minimum, the *Fundamental standards of the International Labour Organization's (ILO)*. Suppliers should not use forced, illegal, or prison labour including indentured or bonded labour or any form of compulsory labour to manufacture products. Suppliers shall not recruit or onboard employees in any way that contravenes applicable laws and regulations nor shall Suppliers retain employees' identity papers or passports.

### 2.4 Freedom to associate

Suppliers shall recognize and respect the rights of workers to form or join trade unions of their own choosing and to collectively bargain, in accordance with legislation in the applicable jurisdiction.

## **2.5 Promote supplier diversity**

Suppliers shall utilize inclusive sourcing processes that promote equal opportunities. Suppliers should also encourage the same principles into their human resources practices to promote fairness and equality in recruitment, promotion and retention process.

## **STANDARD 3 - ETHICAL AND BEHAVIOURAL STANDARDS**

Suppliers shall at all times act with integrity and in an ethical manner, in accordance with applicable laws and regulations. Suppliers must abide by the following:

### **3.1 Regulatory Compliance**

Suppliers must fully comply with all applicable regulatory obligations that apply to all their activities, whether they are carried out domestically or internationally. This includes demonstrating integrity and transparency in their commercial practices, notably by respecting legislation, regulations, and local, regional, national and international codes governing the release of information on their commercial activities, organizational structure, and financial status. In regions where local legislation or regulations differ from international conventions, the University expects its Suppliers to adopt the most rigorous and ambitious standards.

### **3.2 Ensure fair wages**

Suppliers shall pay employees at least the minimum wages required by local laws and written accounting of hours worked, deductions and regular and overtime wages in a language understood by the worker.

### **3.2 Ensure fair competition**

Suppliers shall take all necessary steps to ensure healthy competition amongst subcontractors. Suppliers shall not share privileged information, terms and conditions, or bidding strategies, or other information that restricts free and open competition.

### **3.3 Ensure occupational health and safety**

Suppliers shall ensure that workplaces abide by occupational health and safety standards and promote safe working practices for its employees. Where appropriate, Suppliers shall provide workers with adequate protective clothing and equipment to prevent, as far as can be reasonably practicable, adverse effects to health and safety.

### **3.4 Avoid conflicts of interest**

Suppliers shall, in all matters with the University, abide by the University's governing conflict of interest policies and regulations. This includes maintaining transparency and impartiality in their dealings with the University to prevent any potential conflicts of interest.

### **3.5 Protect data and sensitive information**

Suppliers shall protect the University's data, including personal information and sensitive corporate information and take all reasonable measures to prevent the misuse, theft, fraud, and/or improper disclosure of the University's data. Suppliers shall at all times comply with corresponding data protection laws and regulations.

### **3.6 Avoidance of bribery and kickbacks**

Suppliers shall not engage in any form of bribery or other benefits of the University's staff, or family members in an attempt to further influence or attain potential business opportunities with the University.

## **COMPLIANCE**

Suppliers and subcontractors engaged in providing goods and/or services to the University are responsible for implementing and adhering to the standards outlined in this Code. They must regularly monitor their compliance, promptly address any violations and maintain the integrity of the partnership. Any instances of non-compliance must be reported to the University immediately.

Suppliers and their subcontractors are required to abide by this Code. Suppliers and their subcontractors may not, however, advertise or promote in any way that they are compliant with this Code.

The University reserves the right to audit Suppliers and request proof of compliance to ensure compliance with applicable laws and this Supplier Code of Conduct. Suppliers must maintain current and sufficiently detailed records to substantiate their compliance with all applicable laws and this Supplier Code of Conduct and the University may request that compliance is independently verified at the Supplier's expense.

The University reserves the right to terminate business with a Supplier (i) who is not responsive to requests to address concerns around workplace practices; or (ii) who is not compliant with applicable laws or the Supplier Code of Conduct.

**REMEDIATION**

In instances where a Supplier is found to breach or be non-compliant with this Code, the University may use any measures at its disposal to bring about compliance, including requiring remediation by the Supplier or its subcontractors.