



## **Supplier Code of Conduct**

### **1. Introduction**

Trinity College London ("Trinity") is committed to carrying out its business fairly, honestly and openly.

We expect our suppliers to share our commitments and approach, and we set out below the minimum standards of conduct that we require of all our suppliers. We expect them to adhere to the guidelines and to confirm in signing up to this code that they expect these requirements also of their supply chain, including their sub-contractors. Our aim is that our expectations and requirements under this code are relevant and proportionate to both the extent of the services you provide to Trinity and the size of your organisation. This code draws upon standards that advance safeguarding and social and environmental responsibility including the UK Modern Slavery Act 2015 and Trinity's policies on Safeguarding & Child Protection Policy, Equality, Diversity and Inclusion, Anti-Harassment and Bullying, Anti-Bribery and Corruption, Health and Safety, Data Protection and the Environment ("Trinity Policies").

**By collaborative working, we believe we can jointly have a positive impact on society.**

### **2. Laws and regulations**

Suppliers will comply with all applicable local and national laws, rules, regulations and requirements in the provision of products and services manufactured and provided to Trinity. It is the supplier's responsibility to maintain and enforce these standards with their staff and within its own supply chain. Therefore, we expect our suppliers' conduct to be informed by Trinity Policies (or their own equivalent policies). This includes providing regular legal and compliance training to their staff and ensuring that equivalent training is being provided by their suppliers to their staff.

### **3. Child labour**

There shall be no use of child labour by suppliers in the production or supply of goods and services to Trinity. A child is any person under the minimum employment age according to the laws of the country where the products (or parts of) or services are sourced from. Subject to the prohibition, if workers under the age of 18 are employed, particular care should be taken regarding the duties they carry out and the conditions that they work in to ensure they do not come to any harm (physical, mental or other) as a direct or indirect result of their work or working conditions.

### **4. Forced labour**

Suppliers must ensure that all work is carried out voluntarily. Suppliers will not use or tolerate in their supply chain any form of slavery, servitude, indentured, bonded, involuntary prison, military or compulsory labour (including forced overtime) or any form of human trafficking.

Workers shall not be mentally or physically compelled to provide their labour.

Workers shall not have their identity or travel documents, permits or any other official documents or valuable items withheld as a condition of employment. The withholding of property shall not be used directly or indirectly to restrict workers' freedoms or to create workplace slavery.

Workers' rights to leave the workplace after their shift or to terminate their employment after reasonable notice and receive owed salary must be recognised by the supplier. This applies to local or migrant employees.

## **5. Freedom of movement and association**

Suppliers shall respect the rights of workers to associate or not to associate with any group, as permitted by and in accordance with all applicable local and national laws and freedom of association and collective bargaining. Suppliers shall not interfere with or discriminate against workers choosing to belong to them.

Workers shall be free to move without unreasonable restrictions being imposed on them. They shall not be confined to the workplace or places controlled by the employer (such as accommodation blocks). There shall be no requirement that they live in employer-controlled accommodation (unless this is necessary due the location or the type of work being carried out).

## **6. Discrimination**

We abide by the principles of equality, diversity and inclusion and encourage our suppliers to have diverse work environments, with equal opportunities for all workers.

All employees must be treated fairly and not discriminated against in any form of employment.

Suppliers must not discriminate against any employee based on age, gender, sexual orientation, race, ethnicity, colour, disability, religion, political affiliation, union membership, national origin, marital or pregnancy status during any recruitment or employment processes.

Suppliers must commit to a workforce free of any harassment or threat of harassment. Any forms or threats of harassment, physical, mental, sexual or verbal, must not be tolerated and be prohibited. Suppliers are bound by the terms of Trinity's [Equality, Diversity and Inclusion \('EDI'\) Policy](#) and the provisions of our [Anti-Harassment and Bullying Policy](#) in so far as they relate to any incidence of third-party harassment or inappropriate behaviour. More generally, suppliers are expected to abide by the terms of Trinity's Equality, Diversity and Inclusion ('EDI') Policy, or an equivalent policy of their own.

## **7. Wages and benefits**

Wages and benefits must meet legal minimums and industry standards without unauthorised deductions.

## **8. Working hours**

Suppliers must ensure working hours comply with national laws and standards and should not expect workers to work (including overtime) in excess of hours set out in relevant working time legislation or other national legal limits unless an opt out has been chosen by the employee with appropriate supporting written evidence.

## **9. Healthy and safe working conditions**

Suppliers must provide safe and clean conditions for workers at sites of working and residential facilities. Clear procedures must be in place to ensure regulated occupational health, safety and wellbeing standards are adhered to. When working on Trinity premises, suppliers will be expected to work in accordance with Trinity's Health & Safety Policy and Procedure, copies of which will be provided at the time.

## **10. Environment**

Suppliers must have clear procedures in place to ensure that the range of environmental issues arising from their operations are understood, measured and managed appropriately. Suppliers must be aware of Trinity's [Environmental Policy](#).

## **11. Data Protection and Information Security**

Suppliers shall commit to protecting the confidential information of Trinity's business and shall not disclose any information that is not known to the general public. Suppliers shall comply with all applicable data protection and privacy legislation in force from time to time, including the UK GDPR, and Trinity's [Data Protection policies](#).

Suppliers shall comply with any contractual requirements with Trinity on data protection and information security.

## **12. Business integrity**

Suppliers shall not engage in any form of bribery or corruption or undertake any action that contravenes Trinity's [Anti-Bribery and Corruption Policy](#).

## **13. Disciplinary processes and grievances**

Suppliers must provide a grievance mechanism for workers and their organisations to enable workers to anonymously raise workplace concerns. Workers shall be free to file grievances to their employers about the employer's treatment of them. Workers shall not suffer any detriment, retaliation or victimisation for having raised a grievance.

## **14. Compliance with this Code**

Suppliers must be able to demonstrate compliance with this Supplier Code of Conduct. This includes documented evidence and the right of Trinity (or its nominated firm) to conduct audits. Audits will include visiting and inspecting supplier locations, reviewing supplier records and business practices and carrying out employee interviews.

## **15. Reporting concerns or incidents**

Suppliers are asked to report to Trinity any concerns or incidents of slavery or human trafficking found in its business or supply chain at the earliest possible stage by contacting us directly on [reporting@trinitycollege.com](mailto:reporting@trinitycollege.com).

Alternatively, you can also disclose any concerns using the Trinity EthicsPoint [platform](#).

Dated May 2025