

# SUPPLIER CODE OF CONDUCT



*This first edition of the Supplier Code of Conduct recognises that the Barrett Steel Group relies on its suppliers for the delivery of many important services. I continue to believe that, while underpinned by a contractual relationship, this reliance needs to be based on a bond of trust between Barrett Steel, suppliers & its customer base.*

*In this document, we underline the importance of acting together with trusted suppliers to deliver better services throughout the industries & sectors we trade with. The expectations within this Supplier Code of Conduct have been enhanced to include commitments on how we will work with suppliers to build trust & deliver value.*

*The customer expects that Barretts & its suppliers will look after their interests & deliver on the promises that they make. They expect that suppliers will behave ethically & treat the end users of their service, employees & subcontractors fairly & with respect. Suppliers also expect that we will be fair & transparent in our dealings with them.*

*It is important to publicly state these expectations in a code of conduct & recognise the joint nature of service delivery. Suppliers are an extension of Barrett's business, & employees of suppliers interact with our colleagues, customers & businesses on our behalf every day.*

*This Supplier Code of Conduct strengthens the principles of working together & is intended to help suppliers & those working in Barrett's understand the standards & behaviour that are expected when working in our supply chain.*

*I expect all suppliers to meet these commitments & ensure that their employees, partners & subcontractors will do the same.*

Guy Barrett  
Chief Operating Officer  
December 2023

## Introduction

Our aim is to deliver on a range of commitments including excellent products & services that represent good value; policies that fulfil the Barrett Groups commitments. In delivering these commitments we must ensure adherence to the highest standards of ethical & professional behaviour. Our suppliers play an important role in the delivery of our products & services, our relationships with them are critical to delivering on those commitments.

The overall objective of the Supplier Code of Conduct is to build trusting & open relationships between Barrett's & suppliers to drive improved performance throughout its supply chains. This Supplier Code of Conduct acts in a reciprocal way in respect of our suppliers & sets out the behaviour & cultures we would expect of each other.

In selecting suppliers, Barrett checks that it is trading with reputable bodies. These checks are conducted in line with procurement regulations that guarantee fair access to opportunities for all suppliers & equal treatment during selection processes.

As we move from procurement to the life of the contract/supply agreements, we expect delivery should be in accordance with the spirit of the contract, as well as its letter. We expect our suppliers, in delivering goods & services to, or on behalf of Barrett, wherever they operate, to act in a manner that is compatible with its service values, upholds the reputation of Barrett, promotes innovation & expertise, opens the market to small & medium-sized enterprises, & contributes to growth & prosperity.

We recognise that in many cases a supplier can only be as good as its customer, so in return, suppliers can expect us to place risk with the party best able to manage it, create the right conditions for innovation & create a culture of collaboration between suppliers, subcontractors & Barrett, & pay promptly.

We expect our employees to treat suppliers with fairness & respect & to work jointly with them to build trusting, collaborative & constructive working relationships. In return we expect suppliers to treat our employees in the same way, & to work with us to build those same relationships that are focused on delivering to our client base.

This Supplier Code of Conduct is intended for all those involved in the Barrett supply chain, including central Barrett departments & its subsidiary trading entities, consultants working on behalf of Barrett, suppliers, contractors & subcontractors. As a statement of good practice, it should be read both by current & aspiring suppliers to Barrett & by their subcontractors in the supply chain. We expect our suppliers to communicate this Supplier Code of Conduct to employees, their parent company, subsidiaries & subcontractors; our commitment is that we will communicate it to our employees. The Contractors Code of Conduct which details specific H&S & other compliance requirements sits alongside this document & must be completed & returned as requested.

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## **Compliance**

The Supplier Code of Conduct is intended to set out the way in which we & our suppliers will behave towards each other. It is not intended to be legally enforceable, to create any legal obligations or rights, or to undermine our trade agreements with suppliers or the rules we set out when we procure our goods & services, which always shall take precedence. For the avoidance of doubt, the Supplier Code of Conduct does not take precedence where the courts or other institutions such as a regulatory agency, authority or body have jurisdiction.

All central Barrett departments, (referred collectively to in this Supplier Code of Conduct as “Barrett or Barrett Steel Group”) & suppliers who have entered a contractual relationship to provide goods & services to those trading names, either directly or through sub-contractors, are expected to comply with all aspects of this Supplier Code of Conduct.

Both parties should be open & transparent with each other & report any instances of non-compliance. In these circumstances, the first step is for the relevant Barrett organisation & the supplier to discuss & where appropriate, agree suitable remedial actions. If a party considers that an issue has not been resolved by discussion, it may escalate it to the Group Head Office functional head & in extreme cases to the Barrett Chief Executive Officer.

## **Employees**

### **Respectful Treatment**

Our employees, those of our suppliers, & service users have the right to respectful treatment. We will not tolerate discrimination, harassment, or victimisation in the workplace or in connection with any Barrett service. We expect our suppliers to make the same commitment, including their own employees. The Equality Act 2010 protects against discrimination, harassment & victimisation.

## **Professional Behaviour**

We will work constructively & collaboratively with our suppliers. We expect suppliers to be prepared to invest in their relationships with Barrett, & establish trust with our staff, & with other suppliers involved. We also expect suppliers to be able to speak out when Barrett employees, or other suppliers, are not upholding the values embedded in this Supplier Code of Conduct. We also expect suppliers to speak out, without fear of consequences, when a project or service is unlikely to succeed because of our behaviour or a lack of good governance. We expect the same behaviour when a contract is no longer fit for purpose, for example, in its contractual stipulations or measures.

## **Human Rights & Employment Law**

Barretts & suppliers must both comply with all applicable human rights & employment laws in the jurisdictions in which they work. This includes complying with the provisions of the Modern Slavery Act 2015 & Right to Work. In addition, suppliers must have robust means of ensuring that the subcontractors in their supply chain also comply.

## **Mental Health & Welfare**

We expect our suppliers to recognise the importance of good Mental Health & the positive Welfare of all stakeholders & interested parties. Mental Health 1<sup>st</sup> Aid provision is available at ALL Barrett locations & complies with the Mental Health Act 1993. Where reasonably practicable suppliers are asked to provide the same such support, guidance & assistance to our employees when they attend suppliers' locations.

## **Business Practices**

### **Management of Risk**

Our aim is to ensure that risk is allocated to the party best able to manage it. To assist us in making that judgement we will, where appropriate, engage with the market to understand its views to make informed decisions. We do not expect suppliers or Barrett to be responsible for managing a risk that is best managed by the other party. We expect suppliers not to pass down risk inappropriately to subcontractors, & not to assert that they can manage risk that is in fact better managed by Barrett. All parties should be prepared to share intelligence of supply chain risks, so that material commercial & operational risks, for example the impact of losing a key supplier, can be mitigated. We expect the risks that are highlighted throughout the supply chain by subcontractors & direct contracted entities to be brought to light in a transparent & timely manner. We require suppliers of critical services to develop resolution plans, deployable in the event of a corporate insolvency, to ensure that critical service continues.

## **Continuous Improvement**

We expect our suppliers to use recognised industry practices in the delivery of goods & services to, or on behalf of, Barrett. We also expect suppliers to continuously improve these goods & services & bring innovation, ideas & expertise to help Barrett address its strategic challenges & to support growth. We will endeavor to create the right conditions to allow suppliers to innovate both during the procurement process & the life of a contract & where appropriate we will inform suppliers of our innovation requirements during the procurement process.

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## Data Quality

Barrett will provide accurate data and/or build in flexibility (consistent with procurement legislation) to allow for subsequent validation of data, particularly where new products or services are being provided.

## Value

Whilst we accept that our suppliers make a fair profit margin in return for the risk they are accepting & the commitments & investments they make to be able to deliver products & services for us, we expect suppliers not to exploit an incumbent or monopoly position, an urgent situation or an asymmetry of capability or information to impose opportunistic pricing.

We will engage constructively with suppliers in relation to any required changes & we expect suppliers to reciprocate this. We expect suppliers to work in good faith to resolve any disputes promptly & fairly during the life of a trade agreement or contract through good relationship management & where appropriate, contractual dispute resolution mechanisms, recognising that Barrett & supplier interests are rarely best served by protracted litigation.

## Reputation & Trust

We want to work with suppliers who are proud of their reputation for fair dealing & quality delivery. We want working with Barrett to be seen as reputation enhancing for the supplier. We expect all parties to be mindful of the need to maintain trust & protective of Barrett's reputation, & ensure that neither they, nor any of their partners or subcontractors, bring Barrett into disrepute by engaging in any act or omission which is reasonably likely to diminish the trust in the Barrett "brand". This is not intended to limit any supplier's legal obligations or constrain whistleblowing or their ability to fairly criticise a Barrett body or policy.

## Cyber Security

It is essential that suppliers safeguard the integrity & security of their systems & comply with the relevant Barrett standards & guidance. Suppliers must inform [gdp@barrettsteel.com](mailto:gdp@barrettsteel.com) if they become aware of any cyber security incident that affects or has the potential to affect Barrett data.

## Sustainable Procurement

We expect our suppliers to be aware of, & support Barrett in, complying with its legal & contractual obligations under social value legislation & its target to achieve net zero carbon by 2035. We expect our suppliers to assist Barrett in understanding & reduction of supply chain impacts on our environment, & risks related to the security of raw material supply. We expect suppliers to be open & transparent in upon request assisting Barrett in reporting on product or service utilisation & any environmental impacts.

## Confidentiality

Barrett & suppliers are both expected to comply with the provisions in our contracts & any legal requirements to protect commercial & sensitive information. Barrett & suppliers may both also be party to confidential information that is necessary to be effective partners. This information, even if it is not covered by contractual provisions, should be handled with the same care as information of similar sensitivity. Notwithstanding this mutual understanding, suppliers should recognise that this does not prevent us from disclosing information where we are compelled to do so, for example, by law or parliament.

## Conflicts of Interest

We expect suppliers to mitigate appropriately against any real, potential, or perceived conflict of interest through their work with Barrett. A supplier with a position of influence gained through a contract should not use that position to unfairly disadvantage any other supplier or reduce the potential for future competition, for example by creating a technical solution that locks in the supplier's own goods or services.

## Whistleblowing

We expect suppliers to have a comprehensive whistleblowing policy which allows employees to report any incidents or concerns anonymously, safely & without repercussion.

## Standards of Behaviour

### Ethical Behaviour

We expect the highest standards of business ethics from suppliers & their agents in the supply of goods & services. We expect suppliers to be explicit about the standards they demand of executives, employees, partners & subcontractors & to have governance & processes to monitor adherence to these standards.

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### Counter Fraud & Corruption

We demand that suppliers adhere to anti-corruption laws, including but not limited to the Bribery Act 2010, & anti-money laundering regulations. We expect suppliers to have robust processes to ensure that the subcontractors in their supply chain also comply with these laws. We have zero tolerance of any form of corrupt practices including extortion & fraud that we become aware of & we expect suppliers to be vigilant & proactively look for fraud, & the risk of fraud, in their business. Suppliers should immediately notify Barrett where fraudulent practice is suspected or uncovered & disclose any interests that might impact their decision- making or the advice that they give to Barrett. We expect suppliers to act honestly, & openly, & to fully comply with their tax obligations.

### Counterfeit Material

Any suppliers who are found to be providing counterfeit or fraudulent products to BSG will be removed from our supplier approval database & appropriate actions will be taken.

### Transparency

We seek to be transparent in our dealings with suppliers & we expect suppliers to be open & honest in their dealings with Barrett. Suppliers should expect us to publish agreed key performance indicators & to conduct audits to ensure its supply chain mechanisms & due diligence have been fairly implemented.

### Treatment of Supply Chain & Prompt Payment

We expect suppliers to deal fairly with the subcontractors & suppliers in their own supply chain. We expect suppliers to avoid passing down unreasonable levels of risk to subcontractors who cannot reasonably be expected to manage or carry these risks. We expect suppliers not to create barriers to the use of small & medium-sized enterprises who are qualified to provide goods or services, & to encourage innovation in their supply chains to increase the value or quality of supply.

We expect both Barrett & suppliers to be fair & reasonable in their payment practices.

### Corporate Governance & Corporate Social Responsibility

We expect our suppliers to adhere to the UK Corporate Governance Code or follow equivalent good corporate governance principles underpinned by robust processes. We also expect our suppliers to be good corporate citizens by upholding the values of this Supplier Code of Conduct, taking into consideration social value legislation in delivering goods & services & supporting key Barrett corporate social responsibility policy areas such as diversity & inclusion, sustainability, prompt payment, apprenticeships & skills development & addressing the gender pay gap in their respective organisations.

### Certification, Policies & Accreditations

Suppliers & their subcontractors must complete & return the below table & that on the final page of this document, forwarding copies (where requested/applicable) to [integrated\\_management\\_systems@barrettsteel.com](mailto:integrated_management_systems@barrettsteel.com) & commit to submission of updated, reviewed, new issue or amendments of each document as the requirement arises.

Signed on behalf of supplier:	
Printed on behalf of supplier:	
Position / Job Title	
Supplier Name:	
Products or Services Provided:	

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Supplier Name & Address:	Have (Yes / No)	Copy Supplied (Yes / No)	Expiry (certificate) or Issue Date	Barrett Use Only
BES 6001 Certificate Responsible Sourcing				
BES 6001 Policy				
ISO 9001 Certificate				
ISO 9001 Policy				
ISO 14001 Certificate				
ISO 14001 Policy				
ISO 16949 Certificate				
ISO 16949 Policy				
ISO 17025 Certificates (UKAS)				
ISO 17025 Policy (UKAS)				
ISO 27001 Certificate				
ISO 27001 Policy				
OHSAS 45001 Certificate				
OHSAS 45001 Policy				
ISO 50001 Certificate				
ISO 50001 Policy				
American Bureau of Shipping				
Anti-Bribery Corruption Policy Corruption				
API Approvals Quality				
CE UKCA FPC Factory Production Control				
Climate Action Report				
Code of Ethics Policy				
Conflicts Mineral Policy				
COSHH RoHS Policy				
Corporate, Social Responsibility				
Counterfeit Products Policy & Commitment				
Cyber Essentials Certificate				
Cyber Essentials Policy				
GDPR Policy Data Protection				
DNV				
DOP CE Dec of Performance				
DOP UKCA Dec of Performance				
Environmental Product Declaration				
Equality Opportunity & Diversity, Ethics & Morals				
ETA100156				
Gender Pay Report Pay & Remuneration				
Insurance Certificates				
Lloyds Certificate				
Long Term Supply Declarations				
Modern Day Slavery & Child workers				
MSDS				
NADCAP				
Net Zero Carbon Statement or Roadmap				
NHSS3B Approved Certificate Highways Contracts				
NHSS3B Approved Policy Highways Contracts				
PED 2014/68/EU				
REACH				
Recycle Lifecycle Policy				
Responsible Steel or Steel Zero Members				
Russian Supply Chain Due Diligence				
SECR Report				
Sustainability Policy or Report				