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Business Conduct, Ethics and Social Value Policy – Supplier

Ecorys UK Ltd

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By	Claire Owen

Definitions

Ecorys, we or the company	Means Ecorys UK Ltd Registered company number: 01650169 Registered office: Albert House Quay Place, 92-93 Edward Street, Birmingham, B1 2RA.
Policy	Means this Business Conduct, Ethics and Social Value Policy as amended from time to time.
Responsible Person	Means HR, Line Managers, Compliance Manager, Project Directors, and Madeleine Rose, as the board level compliance sponsor.
Suppliers	Means , contractors, consultants, temporary, and other workers at Ecorys and its subsidiaries or affiliates, including anyone subcontracted to Ecorys for the performance of Ecorys or Ecorys' Clients work.

1. Introduction

Ecorys' reputation for conducting its business with integrity, as an ethical company and with respect to the interests of those our activities affect, is an asset, just as real as our people and brands.

We aim to run a sustainably profitable business and that means investing for growth and balancing short and long-term interests. It means caring about our clients, employees, consultants, shareholders and suppliers, and the communities in which we conduct our business. We consider it essential that all staff and subcontractors understand and comply with our Ecorys values and share our way of doing things.

Our Values



Caring - we value our people, our partners and our clients



Entrepreneurial - we value creativity, innovation and excellence in everything we do



Integrity - we value honesty, transparency and seeking to do the right thing



Together - we value teamwork, collaboration and diversity in all its forms



Leadership - we value our independence, our objectivity, independent thinking and creative problem solving

This Business Conduct, Ethics and Social Value Policy is a core Ecorys Policy, and we commend it to all our suppliers.

2. Scope

This policy applies to all Ecorys business conducted on behalf of our clients, on behalf of any Ecorys' business entity or at any time that suppliers are acting as ambassadors or representatives of the Ecorys' brand, in any public or private event. Suppliers are responsible for exercising good judgment for their behaviour and actions. Social Value has been defined as the additional benefit to the community from a commissioning/procurement process over and above the direct purchasing of goods, services and outcomes, Ecorys supports this objective with all of our clients.

This Policy applies to all suppliers and sub contractors.

2.1 Standard of Conduct

Ecorys conducts its business with transparency, honesty, and integrity and with respect for the interests of all our clients, employees, consultants, shareholders and suppliers, and the communities in which we conduct our operations.

2.2 Regulatory and Legal Compliance

Ecorys suppliers are required to comply with the laws and regulations of the countries in which they operate, in all actions they take for the company.. Suppliers must comply with all company policies and standards as stated where appropriate for the work undertaken and detailed in their contracts. .

2.3 Employees

This policy is for suppliers of Ecorys, who are contracted to deliver work on behalf of Ecorys companies. Ecorys Employees should also refer to the Internal Business Conduct, Ethics and Social Value Policy- Employees.

Ecorys companies are required to recruit, employ, and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed. Ecorys is committed to provide safe and healthy working conditions for its employees worldwide. Ecorys believes it is essential to maintain good communications with employees, through company's communication channels and tools, and consultation procedures. We believe in developing our employees with multiple levels of training and career development opportunities open to all employees.

Ecorys is a living wage certified employer.

2.4 Equality and Inclusion

Ecorys is dedicated to ensuring equality and diversity in all areas of its business, including recruitment, supplier management and the communities we service, using local experts whenever possible. We ensure our services are accessible to all.

All suppliers must comply with the Equality and Diversity Policy.

2.5 Conflicts of Interests

Ecorys and its clients expect all Ecorys suppliers to consider and appropriately manage personal activities and financial interests which could conflict with their delivery of contracted responsibilities whilst working with Ecorys. Appropriate management of any potential conflicts includes making Ecorys Compliance Manager, Project Director aware of any actual or potential conflicts.

A conflict of interest is any situation in which suppliers personal interests, or interests that they owe to another organisation, may (or may appear to) influence or affect their independence in decision-making for and on behalf of Ecorys.

Such conflicts can arise from personal relationships within or outside the workplace/project or through activities or interests outside the workplace/project, such as, but not limited to, political engagement, other employments, directorships, shareholdings with voting rights in a significant volume, voluntary work, or association memberships, including school governors, trustees of charities or professional memberships.

Conflict of Interest could also arise, if a supplier has been in receipt of a grant received by Ecorys through Ecorys Grant Management delivery contracts. If this occurs the supplier should notify their named contract manager as detailed in the contract.

The purpose of this section of the Policy is to protect the integrity of Ecorys' decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect our integrity and reputation .

Suppliers should not interpret our conflict-of-interest procedures as preventing or discouraging their being involved in leisure-time, community, political or other activities, or holding investments in other businesses. However, where these activities, interests or relationships give or could give rise to, or could be or be seen as giving rise to, a conflict of interest it is important that they are properly considered, managed, and registered.

Many conflicts can be avoided altogether, but where this is not possible, careful treatment is required, including transparency, declaration, appropriate authorisation, and possibly changed management of the decision in question.

This Policy requires suppliers to:

- Avoid conflicts of interest wherever possible.
- If this is not possible, identify and disclose any conflicts of interest. Suppliers must declare to the Responsible Person any matter that potentially could or could be perceived to influence their decisions or actions for Ecorys, giving the Responsible Person all the relevant facts in writing.
- If a supplier register their conflicts of interest in the Ecorys Register of Interests maintained by the Ecorys Compliance manager and keep this registration up to date. This information remains in the custody of the Compliance Manager and is kept in accordance with Ecorys Data Protection principles. If required to be disclosed to customers as part of our contractual obligations, the information will be anonymised. The information will be updated as a minimum annually.

2.6 Promotional Activities

Ecorys neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests.

Ecorys companies and suppliers are encouraged to promote and defend their legitimate business interests. In doing so they may either directly, or through bodies such as trade associations, raise questions and discuss particular government actions or decisions. Where their experience can be useful, they are encouraged to cooperate with governments, individuals, agencies and other organisations in the development of proposed legislation and other regulations which may affect such legitimate interests.

Ecorys companies, supplier staff are also encouraged to respond to requests from governments and other agencies for information, observations or opinion on issues relevant to business and the community in which we operate, ensuring that they are maintaining an independent, evidence-based approach.

2.7 Quality

Ecorys is committed to provide products and services which consistently offer value in terms of price and quality. Ecorys maintains the ISO 9001 standard to ensure this level of quality is consistent and maintained. Suppliers are expected to align their work, where appropriate, when undertaking sub contracted services for Ecorys, with Ecorys's ISO 9001 policies and standards.

2.8 Environmental Issues

Ecorys is committed to running its business in an environmentally sound and sustainable manner. Our aim is to ensure that our processes and products have the minimum adverse environmental impact commensurate with the legitimate needs of the business. Ecorys is certified to the Environmental standard ISO 14001. All suppliers are reminded that they must consider environmental issues in all aspects of their work, including travel and not using unnecessary electricity, water, paper, or other resources.

All suppliers are expected to comply, where appropriate with the Environmental Policy.

2.9 Competition

Ecorys believes in vigorous yet fair competition and supports the development and enforcement of appropriate competition laws. Suppliers should ensure that they understand such laws, as applicable to their country of operation and do not transgress them.

Anti-competitive behaviour of any kind will not be tolerated.

2.10 Reliability of Financial Reporting

Ecorys' accounting records and supporting documents, such as time charging, and time sheets must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

2.11 Bribery

Ecorys does not give or receive bribes in any form, in order to retain or bestow business, financial or commercial advantages. Ecorys' suppliers are instructed that any expectation, request, demand for or offer of such bribes, or any corrupt gifts must be immediately rejected and notified.

All suppliers must comply with the Anti-Bribery and Corruption Policy.

2.12 Modern Slavery and Human Trafficking

The Ecorys Group of Companies support the UK Modern Slavery Act 2015 in all parts of its business and services. We have a zero-tolerance approach to any form of modern slavery and human trafficking, and we undertake appropriate due diligence in our supply chain to ensure that slavery and/or human trafficking are not permitted for any of our suppliers.

All suppliers must comply with the Modern Slavery and Human Trafficking Policy.

2.13 Safeguarding Children and Vulnerable Adults

Ecorys is committed to ensuring that children and vulnerable adults that we come into contact with during the course of our work are protected. Safeguarding is about protecting certain people who may be in vulnerable circumstances.

A child is defined as someone who has not yet reached their 18th birthday. A vulnerable adult or 'Adult at risk' is defined as someone with care and support needs who are at risk from abuse or neglect.

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment.
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

All suppliers must comply with the Ecorys UK Safeguarding Children and Vulnerable Adults Policy.

2.14 Confidentiality and Data Security

Ecorys is dedicated to maintaining confidentiality of all data, both internal Ecorys data, external Client and Supplier data and manage all data appropriately and in line with instructions from the data's owner. We respect Data Subject rights and protect all Personal Data in line with regulations, statutory obligations, consent of data subjects and contractual obligations. Ecorys is working towards ISO 27001 Data Security Standard to provide clients and data subjects with additional reassurance that we take our responsibilities seriously.

All suppliers must always comply with Ecorys' Data Protection Policy and Information and Data Security Policy and specific Confidentiality and Data Security requirements as specified in their agreements

3. Compliance Measurement

The Responsible Person will verify compliance with this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner.

It is the responsibility of the Board of Management of Ecorys to ensure that the principles embodied in this Policy are communicated to, understood, and observed suppliers. The Board of Management of Ecorys will not criticize or blame suppliers for any loss of business resulting from adherence to these principles. Equally, the Board of Management of Ecorys undertakes that no supplier will suffer because of bringing to their attention, or that of senior management, a breach or suspected breach of these principles. The UK Whistleblowing Policy sets out the way in which suppliers may raise concerns and the management response to a concern raised in this manner.

4. Exceptions

Any exception to the Policy must be approved by the Responsible Person in advance, in writing.

5. Non-Compliance

Suppliers found to have violated this policy will be subject to appropriate performance management action, up to and including, termination of contract in accordance with Supplier contract

6. Business Conduct and Ethics Policy Review

This Policy shall be reviewed at least annually and as frequently as otherwise required to accommodate required changes.

7. Associated Documents and Policies

Equality and Diversity Policy

Safeguarding Children and Vulnerable Adults Policy

Modern Slavery and Human Trafficking Policy

Anti-Bribery and Corruption Policy

Information and Data Security Policy

Data Protection Policy

Environmental Policy