



# CONFLICT, STABILITY AND SECURITY FUND (CSSF)

ITT 2315: FRAMEWORK RETENDER



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### Question 1.3.2

"It is important that suppliers delivering CSSF projects behave in a way, which is lawful and in line with the Civil Service code. To this end, suppliers are required to uphold the highest standards of ethical and professional behaviour as set out in the Supplier Code of Conduct.

In no more than 2 pages PDF please outline how you will ensure that the standards as set out the Supplier Code of Conduct are demonstrated throughout the delivery of projects."



## Supplier Code of Conduct

The Thomson Reuters Foundation (TRF) is the corporate foundation of Thomson Reuters (TR), and follows their core operational policies, standards, and procedures in all their work, including following their [corporate responsibility and inclusion policy](#), upholding the [Trust Principles](#) - ensuring its integrity, independence, and freedom from bias, their [Code of Business Conduct and Ethics](#), their [Volunteering Policy](#), their [Supply Chain Ethical Code](#), and their [Environment, Health & Safety Policy](#).

We will ensure that we and our supply chain adhere to the ethical and professional behaviour standards detailed in the Supplier Code of Conduct and any amendment to it. We will also ensure that this is demonstrated by us throughout the period of the framework, and in the delivery of any project in the ways detailed below. As required, we will submit within one month of any Framework award a Declaration of Compliance as set out in the Code, and annually thereafter via the BRAVO portal. We will ensure we provide the evidence required in the Compliance Level Matrix of the Code, as and when required.

**Compliance Area 1: Value for Money and Governance:** To ensure we provide value for money, we will focus on reducing costs (economy), ensuring a good level of output from purchased goods and services (efficiency), that the goods and services purchased do well what is required of them (effectiveness), and that funds meet the needs of those required to be reached (equity). We benefit from TR's global database of over 12,000 approved suppliers and from a procurement tool offering 2 million suppliers across 190 countries with negotiated rates. We will access discounted charity flight fares as provided to us by our travel agency, Key Travel. We will implement strict cost control policies in purchasing using local knowledge on benchmarked costs for goods and services. TRF has a **specific procurement guideline** with appropriate thresholds. These are adapted to local contexts as required. For instance, for our CSSF-funded, Aswat Masriya project in Egypt, the guideline was adapted to the local market and contract value/nature of the service. Quotes were requested over the phone from at least three providers for goods or services whose value was over £2,000. We exercised full and open competition for procurements over a value of £15,000. We will undertake vigorous socio-economic analysis prior to programme design, to ensure we target those in need, to ensure equity when spending funds. We will abide by [TR's Code of Business Conduct and Ethics](#) when conducting all of our business. In relation to value for money and governance, relevant policies and systems in this code which we will follow address conflict of interest, bribery and corruption, sanctions, embargoes, and export controls. This Code also details the means to report concerns about ethical behaviour. We will also follow [TR's Supply Chain Ethical Code](#), which proscribes suppliers' behaviour in relation to bribery and corruption. We will employ a transparent open book approach to budgeting and accounting, and will work with the contract authority on a timely basis to ensure we meet the contracting authority's requirements in relation to this. We will employ financial and governance control systems to ensure all contracts are monitored to ensure timely identification and resolution of relevant issues, and a dedicated contract focal point will share learning with the contracting authority. Regular communication with contractors to monitor inputs, outputs, and costs, together with regular programme review meetings will be undertaken. Issues will be escalated internally and externally as required, and any significant breach of the Supplier Code of Conduct will be reported to the contracting authority.

**Compliance Area 2: Ethical Behaviour:** We will ensure we and our contractors uphold required levels of ethical behaviour. We will do this by adhering to [TR's Code of Business Conduct and Ethics](#) and [TR's Supply Chain Ethical Code](#). We will use a compressive recruitment policy for staff and contractors that ensures we meet ethical and legal requirements. Moreover, we will ensure that all staff and contractors working on CSSF related work declare any relevant actual or potential conflict of interest as included in our **Government Contracts Compliance Policy**. Our code of conduct addresses **conflicts of interest** and requires pre-clearing any relationships where there could be - even the appearance - of a conflict. Disclosure and pre-clearance is a required step and written notification is provided to a line manager, HR, or legal counsel, and will be communicated to the contracting authority. All our staff are required to take mandatory initial and any refresher training on TR's Code of Business Code and Ethics, and staff and contractors are asked to confirm that they have read this code and understand the obligations to comply with it. This Code covers human rights abuses, including modern slavery. We have a clear whistle-blowing policy, which details how to report known or suspected policy breaches. We will require, and allow supply chain partners and their workers, to report any ethical or potential ethical standard lapses to TR, who would in turn report them to us. In addition to this, we will detail how staff and contractors involved in FCO funded business can immediately report all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance to the FCO's Anti-Fraud and Corruption Unit, and to us directly.

**Compliance Area 3: Transparency and Delivery Chain Management:** We will ensure we and any delivery chain partner adheres to wider HMG policy initiatives on supply chains, including the support of micro, small and medium sized enterprises, prompt payment, adherence to human rights and modern slavery policies, and support for economic growth in developing countries. We will also engage our delivery chain supply partners in a way that is consistent with the Authority's treatment of its suppliers. This will include, but not be limited to pricing, application of delivery chain risk management processes, and taking a zero tolerance approach to tax evasion, corruption, bribery, and fraud in subsequent service delivery, or in partnership agreements. To ensure this, in addition to ensuring suppliers adhere to [TR's Supply Chain Ethical Code](#), we will also ensure that our contractors comply with the Supplier Code of Conduct, by contractually requiring compliance, and will provide assurance to the Authority of our and supply chain partners' compliance. We will maintain and share with the Authority up-to-date and accurate records of all downstream partners in receipt of Authority funds and/or Authority funded inventory or assets. We will also map how funds flow from us to them, and to end beneficiaries, and will identify actual and potential risks along the delivery chain, and will ensure

supply chain partner employees are aware of the FCO's Anti-Fraud and Corruption Unit and how to contact them, by including this requirement in all relevant supply chain contracts. We will publish all relevant data in accordance with the International Aid Transparency Initiative, and will require our supply chain partners to as well. We will adhere to HMG's prompt payment policy and will not use exclusivity agreements with sub-contractors

**Compliance Area 4: Environmental Issues:** We will ensure we and our supply chain limit our environmental impact, and will ensure that we and our suppliers as necessary, assess, manage, and report on environmental impact. We support and comply with TR's environment, health and safety policy. This means that we are committed to conducting our business operations in an environmentally responsible manner, and are committed to complying with all relevant environmental regulations and law. We will as necessary, develop and administer specific environment policies at a local, country, and regional level, communicate this policy and relevant procedures as appropriate, and will minimise our environment impact (for example through reusing and recycling, using electronic communications rather than travelling for meetings, and the sourcing of sustainable supplies). As necessary, we will collect and analyse environmental impact data, and report on environmental policies, procedures, and performance to relevant stakeholders. We will also ensure that our supply chain also undertake these assessments as necessary, and manage environmental risk, and report on environmental impact. We will require our supply chain to evidence that they have or are working towards having an environmental programme/policy, and in the absence of one, we will require a written statement as to their intent. We also require our supply chain partners to comply with relevant environmental legislation and regulation

**Compliance Area 5: Terrorism and Security:** We use TR's IT systems, which are covered and supported by robust information security policies, procedures, and training. This is supplemented by an active campaign to keep cyber security at the forefront of staff and contractor's minds. All staff and consultants are required to take mandatory information security training. We will ensure that the integrity and security of our IT and mobile communications systems are in line with the HMG Cyber Essentials Scheme, and will look to obtaining an award of the Cyber Essentials or Cyber Essential Plus badges. As relevant, we will adhere to the global Principles for Digital Development. To ensure that Authority funding is not linked to terrorist offences, terrorist activities or financing, we will ensure that we and our supply chain undertake due diligence of our and their suppliers to ensure that funding is not being used to support terrorism. We will ensure that we or our supply chain do not contravene any relevant law with regards terrorist funding, and we will provide assurance that this is the case. We will use [TR's World-Check](#) database as part of our due diligence work on suppliers, which contains details of proscribed organisations and individuals.

**[Thomson Reuters World-Check](#)**

We have free use of this the widest financial crime-related database available, against which we will screen suppliers. Data is derived from public sources and is collated from an extensive network of credible sources, including:

- 600+ sanction, watch, regulatory, and law enforcement lists
- Local and international government records
- Country specific data sources
- International adverse electronic and physical media searches
- English and foreign language data sources
- Relevant industry sources.

**Compliance Area 6: Social Responsibility and Human Rights:** We are fully committed to respecting and promoting human rights in all aspects of our work, and of ensuring that our suppliers do the same. This includes issues of modern slavery/bonded labour, child labour, and the unethical treatment of workers. This is informed by our commitment to [TR's Code of Business Conduct and Ethics](#), and means we will ensure we comply with local labour laws and practices, and maintain our own high ethical standards of worker treatment; do not condone or use forced or child labour, or engage in human trafficking or slavery; will engage workers on the basis of recognised employment or independent contractor relationships in accordance with local law; provide clear information about wages and benefits to workers before they're hired; ensure wages and benefits comply with applicable laws; respect workers' rights to associate freely, join or form unions or works councils, and bargain collectively in accordance with local law; and will work with high-quality suppliers and other business partners that have committed to operating under ethical standards equivalent to our own. [TR's Supply Chain Ethical Code](#) which we adhere to, details more comprehensively how we will ensure that our supply chain and any affiliated company, and any subsequent supply chain partner or agent uphold a number of ethical standards, which include standards on modern slavery, freedom of workers' association, working conditions, child labour, wages and benefits, working hours, discrimination, and worker treatment. To ensure compliance from supply chain partners, we will require regular assurance that they are complying with these codes, and where necessary, will undertake more rigorous checks, including on-to-spot visits to inspect working practices and documentation. Supply chain partner contracts will contain remedy and redress provision, and a regular review of supply partner compliance to these codes will be undertaken, and measures taken to address any breaches. Whilst TR has signed up to the UN Global Compact, we will also sign up to it. TR, of whom we rely for operational supporting in areas that include human resources, procurement, and information technology, report annually on their progress and impact in relation to the sustainable development goals. We will also ensure our practices are in line with the International Labour Organisation convention 138 and the Ethical Trading Initiative Base Code. We will develop and adopt, as necessary, policies to ensure that we and our supply chain embed good practice in line with the UN Global Compact Guiding Principles 1 & 2 on business and human rights. We are committed to supporting the development of local markets and institutions, and to contributing to social and environmental sustainability, as well as promoting and complying with international principles on labour and ethical employment, social inclusion, and environmental protection. We will develop a Statement of Compliance detailing how our business activities will help implement this commitment. We also have a strong commitment to diversity and inclusion in our work, and in the work of our supply chain, and will actively promote this commitment.

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