

Supplier Code of Conduct

2. Introduction

1.1. Overview

This document outlines the principles and standards that Macmillan expects from its suppliers, fostering a collaborative and responsible partnership that aligns with our organisational values. Macmillan's supplier code of conduct considers relevant UK and international legislation and guidance, including:

Ethical Trading Initiative Base Code

The International Bill of Human Rights

International Labour Organisation Core Conventions and Recommendations

UK Modern Slavery Act 2015

UK data protection laws; UK GDPR, DPA 2018, PECR

Macmillan aims to implement this Code throughout its entire supply chain. Macmillan expects its suppliers to act in accordance with this Code, as well as comply with applicable laws within the countries in which they operate. Macmillan also expects its suppliers to work with their own suppliers to ensure that they also meet these standards.

2. Labour and Human Rights

2.1. Non-discrimination

Suppliers must ensure that there is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

2.2. Employment is freely chosen

Suppliers must ensure that there is no forced, bonded, or involuntary prison labour. Workers must not be required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2.3. Human trafficking

Suppliers must not engage in or support human trafficking, and they must implement measures to identify and mitigate the risk of human trafficking within their operations and supply chains.

2.4. Child labour

Suppliers must not use or profit directly or indirectly from child labour. Macmillan defines child labour as per International Labour Organisation Convention 138 and 182, whereby the minimum age for employment or work is 15 years or higher (depending on local legislation) and the minimum age for working at night or performing hazardous work is 18 years. Suppliers should take all necessary measures to verify the age of their workers.

2.2. Freedom of association & the right to collective bargaining

Workers have the right to freely associate and form or join labour unions. Suppliers should respect and recognise the right of workers to organise and bargain collectively. Suppliers should adopt an open attitude towards the activities of trade unions. Worker representatives must not be discriminated against.

2.3. Working hours

Working hours must comply with applicable laws and/or the International Labour Organisation standards on Working time, whichever is the lesser. Overtime should be voluntary, and workers should be compensated fairly for overtime work.

2.4. Living wages

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards. Wages should always be enough to meet basic needs and to provide some discretionary income.

Suppliers must provide all workers with written and understandable Information about their pay before they start work.

Suppliers must pay workers in a timely manner and must not use wage deductions as a disciplinary measure. Deductions from wages should only be made in accordance with applicable laws and regulations.

Macmillan is accredited by the Living Wage Foundation as a Living Wage Employer. Suppliers with a presence in the UK are encouraged to sign up to the Living Wage Foundation and to encourage UK-based entities in their supply chain to sign up to the [Living Wage Foundation](#).

2.5. Working conditions are safe and hygienic.

Suppliers are responsible for providing a safe, hygienic, and healthy working environment, bearing in mind the prevailing knowledge of the industry and any specific hazards. This includes regular risk assessments, adequate training in a language that workers can understand, access to necessary safety equipment, and compliance with all relevant health and safety laws and regulations.

Workers should receive regular and recorded health and safety training, and such training should be repeated for new or reassigned workers. Access to clean toilet facilities and to clean water, and, if appropriate, sanitary facilities for food storage shall be provided.

Accommodation, where provided, should be clean, safe, and meet the basic needs of the workers. Suppliers must ensure that workers are free to report any health and safety concerns without fear of reprisals. Health and safety will be the responsibility of a senior manager at the supplier.

2.9. No harsh or inhumane treatment

Suppliers must maintain workplaces free from any form of inhumane treatment, abuse, or intimidation. This includes physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.

2.10. Diversity and inclusion

Suppliers should promote equity, diversity, and inclusion within their workforce. All employees should have fair and equitable opportunities for employment, development, and progression, irrespective of background or characteristics. Inclusive and accessible approaches should be encouraged across working practices, policies and decision-making throughout the employee lifecycle to ensure barriers to participation are removed. This could include reasonable adjustments, flexible working opportunities, and digital inclusion.

2.11. Grievance mechanism

Suppliers should establish a transparent and accessible grievance mechanism for workers to raise concerns without fear of retaliation. Suppliers must investigate and address grievances promptly and effectively.

2.12. Safeguarding

Suppliers must actively uphold and promote robust safeguarding practices across their organisation and supply chain, ensuring the safety, dignity, and wellbeing of all individuals they come into contact with, particularly adults at risk, children, and young people.

Suppliers are required to comply with Macmillan's safeguarding expectations, as set out in our [Safeguarding Policy](#), and must demonstrate that appropriate policies, procedures, training, and controls are in place to prevent, identify, and respond to safeguarding risks.

3. Ethical practice

3.1. Bribery and corruption

Suppliers must operate with zero tolerance for bribery and corruption, adhering to the Bribery Act 2010. Suppliers must have and maintain in place policies and procedures, including adequate procedures under the Bribery Act 2010, to ensure compliance with all applicable anti-bribery and anti-corruption laws.

3.2. Conflict of interest

Suppliers are expected to disclose any situations that give rise to a conflict of interest, ensuring that business decisions are made impartially. This is to foster a fair and ethical business environment.

3.3. Data Protection and Privacy

Suppliers shall always be aware of and comply with all relevant UK data protection laws and their regulatory requirements in relation to the handling or processing of any personally identifiable data i.e. When handling any personal, sensitive or otherwise confidential data on behalf of Macmillan, they must maintain appropriate security controls, restrict access to authorised personnel, and report data breaches within 24 hours, cooperating fully with investigations

Suppliers must consider the ethical considerations when conducting their operations relating to the privacy, freedoms and preferences of individuals.

3.4. Information Security and Cyber Security

Suppliers should maintain appropriate technical and organisational measures to protect Macmillan's information, systems and data from unauthorised access, loss, misuse or cyber security threats. Suppliers are expected to comply with applicable data protection legislation and operate security controls proportionate to the nature of the services provided and the information processed.

3.5. Artificial Intelligence and Emerging Technologies

Where suppliers use artificial intelligence or other emerging technologies in the delivery of goods or services to Macmillan, they should do so responsibly, ethically and transparently. Suppliers should have appropriate governance, safeguards and human oversight in place to manage risks relating to privacy, explainability, security, bias, accuracy, effective controls and monitoring, and compliance with applicable laws and regulations. There must be no unauthorised training or unauthorised use of Macmillan data.

Where AI services rely on additional providers, e.g. hosting, annotation services, cloud-based phone services, suppliers must seek written approval from Macmillan prior to appointing any such sub-processor and be responsible for conducting appropriate due diligence.

4. Environmental standards

4.1. Overview

Macmillan is committed to being an environmentally responsible charity, proactively taking steps to reduce the environmental impact of its operations, including, across its supply chain.

Suppliers must demonstrate an on-going commitment to minimise their environmental impact and promote sustainable practices.

Where appropriate to their size and circumstances, suppliers should have in place policies and processes that enable them to identify, prevent, mitigate, and remedy any actual or potential adverse effect on the environment they cause or contribute to through their activities.

4.2. Policy and targets

All suppliers are expected to have:

- A current Environment Policy/ strategy that sets out their commitment to reduce their environmental impact, including Net Zero commitment of 2050, if not sooner.
- Targets and strategies for improving environmental performance, including reducing greenhouse gas emissions (across energy, gas, travel, etc); water consumption and reduction in waste to landfill).
- Sustainability Policies which are regularly reviewed and updated.

4.3. Provision of products and services

Suppliers are expected to not cause unnecessary environmental impact (including the use of hazardous materials) in the development and provision of products or services.

On request suppliers are expected to provide accurate information on the environmental implication of products and services.

4.4. Waste

Suppliers should prevent waste and must consider re-use of materials, recycling streams and reductions in waste to landfill.

4.5. Sustainable procurement

Suppliers should have a current Procurement Policy that includes a Sustainable Procurement commitment.

Suppliers should demonstrate how they have/intend to procure sustainable services/products from their suppliers, including their own code of conduct/procurement questionnaire.

5. Supply chain due diligence

Suppliers are expected to uphold standards, ensuring transparency, ethical sourcing, compliance, with environmental and social responsibility. This should be undertaken through comprehensive due diligence so that a resilient and ethical supply chain supports Macmillan and aligns with its organisational values. Suppliers must be able to demonstrate that they hold sufficient due diligence processes and can evidence these if requested.

Macmillan will utilise third party supplier intelligence and/or questionnaires at its discretion as part of its due diligence process to monitor supplier risk. Suppliers are expected to always comply with this process and provide supporting information when asked to, to enable the pro-active management of risk.