

THE
HOWARD
deWALDEN
ESTATE

Supplier Code of Conduct

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Foreword

‘Howard de Walden recognises its suppliers are an extension of our business. We depend on our suppliers to serve our customers on a daily basis.’

Mark Kildea, Chief Executive Officer



Howard de Walden relies on its suppliers for the delivery of many important customer services, for assistance in delivering projects and for advice in a wide range of business matters.

We expect our suppliers to look after the customers interests. Howard de Walden and its occupiers expect suppliers to perform to a high standard, to behave ethically, comply with UK Law, and to treat their service users, employees and subcontractors fairly and with respect.

This code exists to provide you, our suppliers, with knowledge of the standards and behaviours that we expect from you when you work with us.

We expect all suppliers to meet these commitments and to ensure their employees, partners and subcontractors are aware of the code and our requirements.



Our Mission

With roots in Marylebone that extend back several centuries, the Howard de Walden Estate is thoroughly invested in the progress of the entire area, our success is a reflection of the success of the community we serve.

We want to create the setting for Marylebone to flourish. We strive to enhance the community through our responsible stewardship, excellent service and unique offering, so Marylebone remains a coveted place for generations to come. Whether people are here to live, work, study or visit, we want them to feel part of something exceptional.

Our business is based around the management of a large portfolio of rental properties. A diverse community exists, made up of residents and businesses, such as the shops and restaurants of Marylebone Village and the world class healthcare providers of the Harley Street Medical Area.

We value **collaboration**, **innovation**, **responsiveness**, **excellence** and **inclusiveness**, and expect our staff and suppliers to behave in a way that aligns to these values when operating in our community and liaising with our colleagues, customers, partners and other stakeholders.

Collaboration: Cultivating great relationships with customers, colleagues, suppliers, community and other stakeholders

Innovation: We offer buildings and spaces that provide modern-day amenities, designed and suited to our customers' lives and livelihoods

Responsiveness: Listening and reacting to other parties who are also invested in the prosperity of the area, through partnering and mutual respect

Excellence: We want Marylebone to continue to be known as a fantastic place to live, visit, study and do business

Inclusiveness: We recognise that diverse and inclusive businesses grow prosperity

Expectations

Every supplier that works with the Howard de Walden Estate is expected to familiarise themselves with this Code of Conduct and its requirements.

This Code sets out standards that we live by, and we want our suppliers to abide by these standards too. Clearly articulating the expectations and values we want to see within our supply chains is part of our plan to work in partnership, so Marylebone continues to be a highly desirable place to live and do business. This is in all our interests.

The Code of Conduct applies to any and all who work for us. All suppliers and their onward supply chains must comply with this code of conduct whilst working for, or with, the Howard De Walden Estate.

Our suppliers are expected to operate in a manner where all business activity is carried out fairly, honestly, and openly. We operate a zero-tolerance approach to any activity which is prohibited by UK or international law. Suppliers must seek to avoid or mitigate any adverse reputational or financial impact to The Howard de Walden Estate.

We expect our suppliers to have processes to ensure that they, and their supply chains, follow the guidance set out herein.

Howard de Walden should be notified immediately if any actions or practices are identified or uncovered which contradict this Code.



Health & Safety

‘Howard de Walden is dedicated to fostering a culture that prioritises safety in the operation of our business. Ensuring the well-being of our personnel and those we collaborate with is of paramount importance to us.’

Michelle Wilson, Head of Health and Safety



We expect our suppliers to adhere to comparable standards, ensuring the establishment of a secure, healthy, and safe working environment for their employees, contractors, and those impacted by their operations.

Suppliers must implement and sustain effective health and safety management systems in accordance with relevant legislation. This includes delivering specialised training and demonstrating strong risk management practices to safeguard workers from workplace injuries.

We are committed to upholding the highest health and safety standards across our supply chain, prioritising the well-being of all individuals impacted by our operations. It is imperative that our suppliers establish and maintain a secure and healthy working environment for all parties who could be affected by their activities.



Health & Safety

Suppliers are expected to furnish comprehensive information and guidance on health and safety to all relevant parties, ensuring they fulfil their responsibilities in creating a safe workplace. This encompasses providing facilities and amenities for their employees that adhere to the highest standards of hygiene and safety. These requirements extend to the provision of safe and sanitary facilities, including bathrooms and welfare areas, meeting the fundamental needs of all supplier staff member

Suppliers must implement training programs and systems to effectively respond to and report accidents, incidents, health issues, and foreseeable emergencies. Robust procedures must be in place for recording, investigating, and incorporating lessons learned from accidents and emergency situations.



Our key expectations are summarised as:

Environment:

- The supplier should always provide a healthy and safe environment for anyone affected by their activities.
- Suppliers that carry out any planned maintenance, refurbishment, or development schemes on behalf of Howard de Walden must be registered under the Considerate Constructors Scheme and achieve a minimum score of 35 points.

Principles:

- The supplier will ensure all employees are offered paid holidays.
- Employees must be allowed breaks during the working day.
- No employee should work more than the local legal maximum.

Facilities:

- The supplier shall provide hygienic washrooms and welfare facilities for all workers.

Training:

- The supplier shall ensure the correct systems and training are in place in the event of an accident or emergency.
- Training materials shall be easily accessible for all staff.
- All suppliers must inform HdWE of any incidents that occur.

‘Our supply chain partners will demonstrate their commitment to carbon reduction.’

Simon Tranter, Head of Sustainability



We recognise climate change represents a material threat to the planet and we need to adapt how we do business accordingly. We understand the pressing need to curtail carbon emissions and combat the advancing impact of climate change. As a testament to our commitment we have set a science-based target and made achieving Net Zero Carbon a core element of our strategic business objectives.

Howard de Walden is dedicated to achieving our 2040 Net Zero Carbon commitment, and we understand that collaborating closely with our suppliers is fundamental to success. We prioritise partnerships with stakeholders who share our vision and actively contribute to sustainable outcomes through their services and products.



Sustainability

To help achieve our goal of Net Zero Carbon by 2040, our supply chain partners should be able to demonstrate their commitment to carbon reduction by:

- Promoting energy efficiency measures, including reasonable alternatives or options.
- Identifying carbon reduction opportunities and taking meaningful steps to measure and reduce carbon emissions.
- Consideration to becoming a Net Zero Carbon business in operation.
- Aligning your targets to the Science-Based Targets Initiative when requested for Scope 1 and 2 emissions.



Our key expectations are summarised as:

Regulations:

- Comply with all applicable local and national environmental laws and regulations.
- Hold a relevant environmental policy outlining your commitments, which is dated and signed by senior management.
- Our Environmental Policy as it applies to your organisation, services and/or products, and when requested through a contract or agreement.

Environmental Management:

- Keep records that demonstrate the effective implementation of your environmental procedures.

Waste Reduction:

- Monitor, manage, and report on waste generation relevant to your organisation.
- Take steps to eliminate waste and reduce the lifecycle impacts by integrating circular economy principles.

Reporting:

- Provide relevant data, supporting information, and evidence to help track performance with our policies or your own compliance obligations

Lawfulness & Ethics

All suppliers must comply with all applicable UK and international law as well as with any additional industry standards, including but not limited to the General Data Protection Regulations 2018 (GDPR), Bribery Act 2010, Modern Slavery Act 2015 and Sanctions and Anti-Money Laundering Act 2018.

Suppliers shall ensure effective training and compliance programmes are implemented and maintained to ensure compliance across matters such as data protection, anti-fraud and anti-money laundering.

Our expectations:



Suppliers and their supply chain to pay real living wages; wages that are always enough to meet the cost of living.



All suppliers shall ensure working hours of the employees do not exceed the maximum set by UK's legislation, with appropriate breaks throughout their working days.



The Supplier must ensure the appropriate Right to Work checks are completed on all employees before their employment commences. All documents and data must be retained.



The supplier is responsible for the payment of subcontractors on our projects and must pay on time and within the terms set within the contracts.



Suppliers should have a strategy for diversity, equity, inclusion and belonging that is industry appropriate.



Lawfulness & Ethics

Modern Slavery

- We require all suppliers to implement and enforce effective systems and controls to ensure that modern slavery and human trafficking is not taking place anywhere within our supply chains.
- We expect all suppliers to act in accordance with the UK modern slavery Act 2015, to ensure that no employee or individual working in any supply chain is being exploited.

Slavery, Human Trafficking & Forced Labour

- Suppliers shall ensure that forced labour and human trafficking is prevented, as well as adhering to any other modern slavery laws in the UK. All employment must be voluntary and suppliers will not tolerate any forced work within their own organisation or supply chain.

Child Labour

- Suppliers shall strictly prohibit and will not engage in or condone the unlawful employment or exploitation of children below the minimum legal age for employment in the workplace.
- Children under the age of 18 shall not be employed for any hazardous or night work, or any work that could harm the child's personal and/or physical development such as manual or hard labour.
- In the event a child is found to be working, the supplier shall inform the correct external authorities immediately and shall contribute to, and support the development of, their policies or procedures.

Taxation

- Our suppliers must observe all applicable tax laws, rules, regulations, and reporting and disclosure requirements
- Suppliers must apply controls over their activities which seek to ensure no risk of tax evasion or criminal facilitation of tax evasion.
- We expect suppliers to make us aware of any tax evasion committed by a supplier in any capacity of a person acting for, or on our behalf.

Anti-Bribery & Corruption

- We expect our suppliers to operate in a manner where all business activity is carried out honestly and openly. We operate a zero-tolerance approach to any activity which would be perceived as an attempt or acceptance of bribery, taking account of the UK Bribery Act 2010.
- Our suppliers must ensure they are compliant with the Criminal Finances Bill and any subsequent legislative updates.

Gifts and Gratuities

- Suppliers shall not give to or receive from any director, employee, or representative of Howard de Walden any gifts, entertainment of favour of material value providing an unfair advantage to others including HdWE suppliers.

Conflict of Interest

- Suppliers must avoid all conflicts of interest when doing business with us. The suppliers are responsible for identifying and reporting any involvements or potential scenarios in which they have a conflict of interest or where a conflict of interest may occur.

Community

We have a responsibility to the community and strive to enhance it through our responsible stewardship, excellent service and unique offering, so Marylebone remains a coveted place for generations to come.

We endeavour to create meaningful, mutually beneficial relationships with local stakeholders, support vulnerable people and try wherever possible, to maximise the social impact we can have as a business.

The estate wants to work with suppliers who share our values and who want to work with us to help support local businesses and the community making Marylebone a better place to live.



When engaging with our community we focus on:

- Creating a joint commitment with our community.
- Being accountable.
- Engaging early and better.

We expect our suppliers to:

- Utilise local employment where possible on work that they perform for us.
- Align themselves with our community engagement approach.
- Have a positive impact on our community where possible by offering opportunities or giving back within Westminster. .
- Work within Westminster City Council's permitted hours when undertaking construction works.
- Follow Westminster's Code of Construction Practice for construction works adopting best practice to reduce disruption for those who live, work and visit the area

Contact Us

Reporting

If you have any concerns about any actions which you believe may go against the standards and principles set out in this Supplier Code of Conduct, please contact us at procurement@hdwe.co.uk.

Violation of our Supplier Code of Conduct

We reserve the right at any time to request suppliers demonstrate their compliance with this Supplier Code of Conduct. Any infringements may have a bearing on our ongoing relationship with a supplier.

Contact Us

If you require further information in relation to the matters set out in this Supplier Code of Conduct, or would like to discuss the supplier process with a member of the team, please contact procurement@hdwe.co.uk.





The Howard de Walden Estate
23 Queen Anne Street
London
W1G 9DL

Tel: +44 (0)20 7580 3163
Fax: +44 (0)20 7436 8152
Email: enquiries@hdwe.co.uk
Web: www.hdwe.co.uk