



The UK's professional  
services solution.

# Supplier code of conduct



Version 1.0

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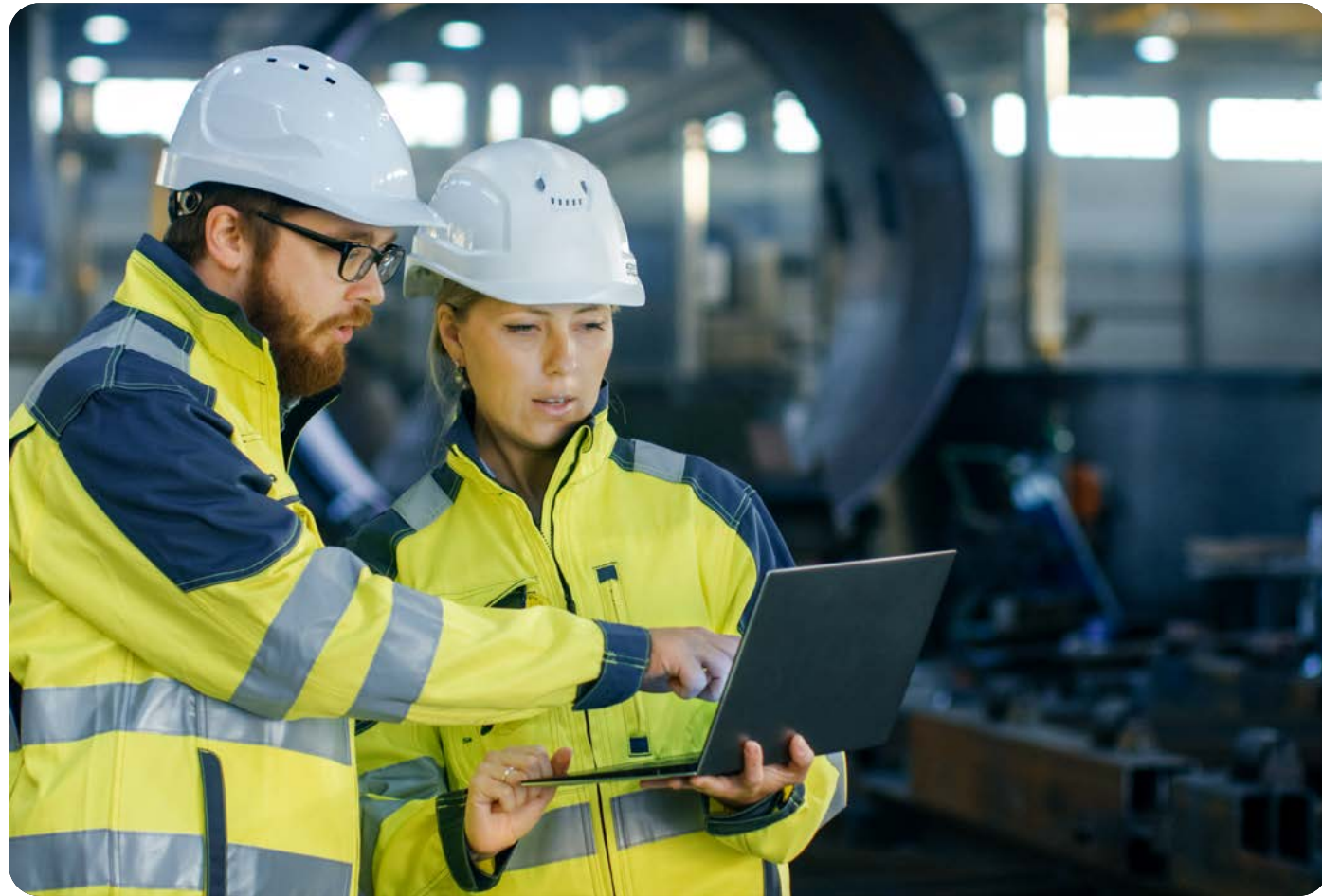


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## Purpose

We are committed to operating as a sustainable and responsible business, whilst upholding the highest social, ethical, and environmental principles for the benefit of our stakeholders and the wider community.

To achieve this, we expect our suppliers to share these commitments, and our Supplier Code of Conduct outlines the requirements of all our suppliers, their employees, and contractors, including the values and behaviours they demonstrate. We also expect suppliers to apply the following principles to their own supply chains, encouraging them to take steps to implement them wherever possible.

Our objective is to work in partnership with our suppliers, and because of this, we do not intend to impose any unnecessary or onerous obligations. We expect our suppliers to implement adequate measures to adhere to all applicable legal, ethical, social, and environmental requirements and best practices.

## Our values

At Bloom, we are a purpose-driven organisation which means our company purpose, “Enabling brilliant outcomes today that build a better tomorrow”, is at the heart of everything we do. We expect our people to live our purpose each day and to act in a way that demonstrates our cultural trademark behaviours:

- **We are real and true** – we welcome difference, we support each other, we do what we say we will do, and we treat people with respect.
- **We work together** – we take responsibility for our actions and consider their impact on others, we make time to understand the people we work with, we share ideas, information, and expertise, we take the whole team on the journey.
- **We are curious** – we take the initiative, we use our mistakes to learn and improve, we ask ourselves, is there a better way?

At the core of what we do is our ambition to lead by example, building an ethical and responsible business that treats all people fairly and with dignity.

It is essential that our suppliers act in a way that always reflects our own values and behaviours and to apply these to all the different aspects of their business and activities.

We maintain a robust policy framework to ensure we continue to operate in a fair and ethical manner, as well as complying with relevant laws and legislation. Our policies include but are not limited to the following:

- |                                   |                             |
|-----------------------------------|-----------------------------|
| • Corporate Social Responsibility | • Data Retention            |
| • Supplier Diversity              | • Wellbeing                 |
| • Sustainable Procurement         | • Whistleblowing            |
| • Environmental Policy            | • Data Protection           |
| • Equality & Diversity            | • Anti-Bribery & Corruption |
| • Health & Safety                 | • Bullying & Harassment     |
| • IT Security                     | • Green Travel              |

We look to our suppliers to have policies that are appropriate for the business they are operating and relevant to the services being provided to Bloom and/or our clients.

# Our people

## Wellbeing

We are committed to maintaining a workplace in which the health, safety, and welfare of those working for us is safeguarded. We take steps to identify and mitigate the effects of wellbeing issues, and support our people through difficult times, whether because of issues at home or at work.

We will take all reasonable steps to make sure that our people:

- Have a safe place and safe system of work
- Can take appropriate breaks
- Are not put under excessive working pressures
- Are not subject to discrimination or harassment at work

We take our wider responsibilities towards our workforce seriously and do everything we can to ensure they feel engaged, respected, and supported at work, with a clear route to wellbeing support for everyone.

We look to our suppliers to have similar processes and procedures in place which support the wellbeing of their employees and contractors.

## Diversity, Equity & Inclusion (DEI)

We recognise that our country is multicultural and diverse, and we understand deeply how a diverse workforce can enhance our business. The aim is for our team to be truly representative of all sections of society and our customers and for each employee to feel respected and able to give their best as part of our inclusive commitment culture. We are passionate about bringing people with us as our business grows by developing talent in a synergistic way. This means career opportunities at Bloom are underpinned by our offering fair access, opportunities, and advancement for all.

As a business, we undertake a variety of activities in support of DEI, but our main commitments are summarised below:

- Encourage workplace equality, diversity, and inclusion as they are good practices and make business sense.
- Create a working environment free of bullying, harassment, victimisation, and unlawful discrimination, promoting dignity and respect for all, where individual differences and the contributions of all staff are recognised and valued.
- Take complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public, and others during the organisation's work activities seriously.
- Make training, development, and progress opportunities available to all staff, who will be helped and encouraged to develop their full potential.
- Make decisions concerning staff based on merit (apart from any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Review employment practices and procedures when necessary to ensure fairness and update them and the policy to take account of changes in the law.
- Monitor the makeup of our workforce



We want everyone at Bloom to succeed. To achieve this, we must harness the diversity within our workforce and provide an environment that recognises and fosters the unique differences and characteristics that make up our team. Taking proactive action in this area will help to drive innovation and growth and, in turn, improve the experience of our customers and stakeholders.

We look to our suppliers to adopt appropriate practices and procedures that promote Diversity, Equity, and Inclusion within their workforce, specifically focusing on the abovementioned areas.

## Anti-Discrimination

We take a zero-tolerance approach to any form of discrimination, harassment, or victimisation. Our policy is to treat everyone equally, regardless of gender, race, disability, sexual orientation, age, nationality, religion or belief, marital status, ethnic origin, political convictions, family responsibilities, gender reassignment or any protected class as defined by local law.

We look to our suppliers to adopt appropriate practices and procedures supporting a zero-tolerance approach to discrimination and comply with relevant laws and legislation.

## Health & Safety

The Health and Safety of our people are extremely important to us. Therefore, we take steps to ensure they are fully supported and protected and clearly understand the processes and procedures we have in place.

As we operate a hybrid working model, it is critical that we dedicate time to our people so we can build knowledge and awareness of home-based risks and best practices. It's crucial that they can apply these easily and practically at times when they are working away from the office or at home.

We are committed to maintaining our office environment in a condition that is safe and free from hazards, ensuring that significant risks arising from work activities are mitigated or adequately controlled, and preventing accidents and cases of work-related ill health.

We look to our suppliers to provide their people with a safe and healthy workplace in compliance with all applicable health and safety laws and regulations. Suppliers should also provide their people with the necessary training to help to ensure their safety.

Suppliers should identify and assess any potential risks in the workplace and develop and implement appropriate plans and processes to mitigate any risk or harm to life and property. Suppliers must maintain records documenting workplace injury, illness, and safety training and implement procedures encouraging worker reporting.





## Our world

At Bloom, we recognise the importance of fully committing to reducing our environmental impact. The area where we can make a significant difference is the removal and reduction of greenhouse gas (GHG) emissions from our activities and supply chain in support of the wider commitment of the world to limit global temperature increases and their impact on the planet. Our core focus is on the following activity:

- For our company to achieve Net Zero in line with the Science Based targets set out by the UNFCCC, i.e., to achieve Net Zero no later than 2050 and target a 50% reduction in emissions by 2030.
- To set realistic short and long-term targets to achieve our Net Zero commitments.
- To report our business' total greenhouse gas emissions regularly and for our performance to be part of the Race to Zero Community's annual reporting back to the UNFCCC.

We also maintain an awareness of other environmental impacts, such as pollution, waste disposal, and responsible sourcing, and act via our Green Travel and Sustainable procurement policies in support of this.

We look to our suppliers to formally commit to net zero, reporting on emissions and publishing annual plans that demonstrate progress. We ask that suppliers comply with all applicable local and national laws and regulations relating to their individual business practices and the protection of the environment. Wherever possible, we expect supplier business operations to be managed in a responsible and sustainable manner, and any negative impact on the environment should be continuously reduced or removed wherever possible.

## Sustainable procurement and supplier diversity

As an organisation, we are committed to conducting our operations in a socially responsible and sustainable manner. Our sustainable procurement policy reflects this commitment and sets out the guidelines for our procurement practices.

By incorporating sustainable procurement principles into our procurement process and engaging with our suppliers, we aim to promote sustainability throughout our supply chain and positively impact the environment and society.

We also recognise that diversity and inclusion are crucial for our success. We are therefore committed to creating an inclusive and diverse supply chain that reflects the communities in which we operate. Our Supplier Diversity Policy aims to support businesses owned by underrepresented groups and promote their participation in our procurement process.

We encourage our suppliers to adopt similar practices and monitor progress toward achieving supplier diversity objectives.



## Our communities

At Bloom, we are passionate about the impact our activities can have on our communities. We dedicate our time to the support of causes that are close to our hearts and purpose. As one team, we aim to be a movement for good, with a common goal of leaving a positive legacy, for the benefit of everyone.

Our mission is to foster a culture that enables lasting and positive change within our communities. We value the difference our people can make, and we collectively sign up to deliver the following:

- Building strong relationships with customers and the wider community by giving back to the communities we serve. Creating trust, loyalty and a positive brand and reputation.
- Being socially responsible and good corporate citizens who contribute to the well-being of our communities.
- Supporting the local economy, creating jobs, and stimulating economic growth for the benefit of everyone.
- Creating a positive work environment, boosting morale through community engagement, and partnering with local charities.
- Doing the right thing by using whatever resources we have to make a positive impact in the world.

The promotion of social value and sustainability is central to our business. It motivates our community engagement and enables us to deliver measurable social impact. We look to our suppliers to take similar action proportionate to their resources.





## Legislation, compliance & confidentiality

### Compliance with applicable laws and regulations

We believe in operating a reputable and responsible business and always act honestly, fairly, and openly, which upholds our commitment to compliance with all applicable laws and regulations.

We look to our suppliers to comply with all applicable legislation and regulations and obtain (and comply with the terms of) all governmental and other licences and consents necessary for the carrying on of their business. We also expect adherence to accounting, tax, and other financial obligations/best practices.

This includes all areas outlined within this Code of Conduct, including but not limited to laws which apply to: Employment, Human Rights, Health & Safety, the Environment, Anti-Bribery and Corruption, Data Protection, etc.

### Prevention of Modern Slavery, Forced Labour & Human Trafficking

We are committed to preventing modern slavery and human trafficking within our business and supply chain and expect the same high standards from our suppliers. We do not tolerate modern slavery within our operations or within our supply chain. We ensure everyone who works for us is respected and we expect the same of anyone we do business with, including upholding the following:

- No forced or involuntary employment
- Safe and clean working environments
- No child labour or exploitation
- Payment of the real living wage
- No excessive working hours
- Zero discrimination
- No harsh or inhumane treatment

To meet these expectations, you must fully understand your business operations and those of your supply chains. We look to our suppliers to uphold and comply with the requirements laid out in Modern Slavery Act 2015, and we encourage the publication of a statement on modern slavery.

### Sanctions

We are committed to conducting business in compliance with all laws and sanctions imposed by HM Treasury, the European Union, the United Nations or the Department for Business, Energy, and Industrial Strategy.

We look to our suppliers to strive to do the same and will comply with all applicable sanctions-related laws, rules, and regulations.

### Confidentiality & Intellectual Property

Bloom works closely with our customers to identify, protect and and keep commercially sensitive information confidential. Whilst recognising our clients are usually subject to the Freedom of Information Act 2000, we support the use of project-specific Non-disclosure Agreements in addition to the confidentiality safeguarding provisions in our standard form contracts.

We appreciate the value and importance of identifying any intellectual property rights (IPR) that may be used or created during the delivery of our projects. We work with our customers to ensure a clear understanding of project IPR use and ownership.

We look to our suppliers to take similar steps to identify and protect commercially sensitive information to ensure it is kept confidential and to adhere to the provisions that Bloom has in place in relation to confidentiality and IPR.

### Anti-Bribery & Corruption

We remain committed to operating business in an ethical and honest manner and, as such, have zero tolerance for bribery or corrupt activities. We will uphold all laws relevant to countering bribery and corruption in the UK, including following the Bribery Act 2010.

We recognise there are serious consequences if any bribery or corruption is identified, including fines, the inability to tender for public contracts, and serious damage to our reputation.

We look to our suppliers to implement similar programmes to prevent these activities.

### Gifts & Hospitality

Bloom develops long-term business relationships based on trust and respect. Exchanging gifts and hospitality can build goodwill but may, or may appear to, create improper influence. We remain open and transparent about any gifts and hospitality we receive and have procedures to support this. We mandate that gifts or hospitality comply with applicable laws and regulations and do not violate our relevant internal policies.

We prohibit our people from engaging in bribery or corrupt behaviour, and we do not provide or authorise improper benefits or payments. We are fully committed to only receiving or offering gifts, hospitality or other items of value that avoid the impression of undue influence or the appearance of inappropriate behaviour. Gifts, hospitality, or improper benefits never influence our business decisions.

We look to our suppliers to have appropriate policies in place and to comply with all applicable laws and regulations.

## Data Privacy

Bloom recognises its obligation to respect privacy and personal information and to ensure such information is protected and handled responsibly, and used only for the purposes for which it is provided.

Bloom suppliers must ensure that all personal information is controlled in accordance with, and that their data and information systems comply with, applicable laws and regulations. We look to our suppliers to manage personal information in accordance with the following Data Protection Principles. They will:

- Obtain personal information only for specified, explicit and legitimate purposes
- Ensure personal information is adequate, relevant, and not excessive
- Ensure personal information is accurate and, where necessary, kept up to date
- Not keep personal information for longer than is necessary
- Process personal information in accordance with the rights of the individual
- Keep personal information secure
- Not transfer personal information unless there is adequate protection in place

In the event of a data breach being identified in connection with the services provided to Bloom and/or its clients, we expect all suppliers to inform us as soon as is practicably possible. This can be done by emailing our Legal team at [legalteam@bloom.services](mailto:legalteam@bloom.services).

## Information & Cyber Security

At Bloom, we align and leverage information and cyber security best practices and policies from organisations such as the National Cyber Security Centre (NCSC) and the National Institute of Standards and Technology (NIST). In turn, we expect our suppliers to consider their own security practices in alignment with these standards.

The key areas that we encourage our suppliers to consider are as follows:

- Provide updates to relevant devices and systems securely
- Support appropriate levels of authentication
- Protecting data at rest and in transit
- Permit only trusted software
- Minimise the privilege and reach of applications
- Provide security logging, alerting and monitoring capabilities
- Enable recovery to a good known state

Information and cyber security standards and guidance are driven by Bloom's clients' needs and what their various sectors demand but also to ensure that Bloom's trust in partnership is not threatened.

We look to our suppliers to take steps appropriate for their business to ensure alignment with our approach.





# Risk management & compliance

## Risk Management

At Bloom, we understand the need to have robust risk management procedures in place, to ensure that that we safeguard ourselves, now and in the future. Businesses can face many risks; therefore, risk management should be a central part of a business' strategic management. Bloom's approach to risk management helps us to identify and address the risks we face and in doing so increases the likelihood of us successfully achieving our business objectives.

We look to our suppliers to put in place appropriate measures and procedures, so that they can identify and manage their own business risks as well as the areas included within this Code of Conduct.

## Business Continuity

To ensure the continued operation of our business, even during unexpected events, business continuity planning is an essential part of our risk management. Disruptions can arise from various causes, such as natural disasters, cyber-attacks, power outages, or pandemics.

Having a plan is crucial as it enables us to respond quickly and effectively in the face of such disruptions. Plans should detail the necessary resources, procedures, and employees that will be required to maintain business continuity.

In this context, our Business Continuity Policy serves as a critical guide for Bloom to navigate through recovery efforts should an emergency occur. The policy outlines the risks to the normal operation of services and sets out the planned actions in case of an incident or major disaster.

The procedures within the policy have been specifically designed to provide clear, concise, and essential directions for recovery from various organisational interruptions and disasters. By having a structured plan, Bloom can mitigate the impact of disruptions, protect its reputation, and maintain stakeholder confidence, all of which contribute to the business's long-term success.

## Embracing Change

We are passionate about change and embrace how positive change can enhance our organisation. Through our trademark behaviour, "we are curious", we take the initiative and forge bold new paths that support our growth. We use our mistakes to learn and improve how we do things for the benefit of our employees and customers, and we always ask ourselves whether there is a better way of doing things to simplify life for all. We do this to ensure we continually meet the needs of our customers whilst delivering maximum value.

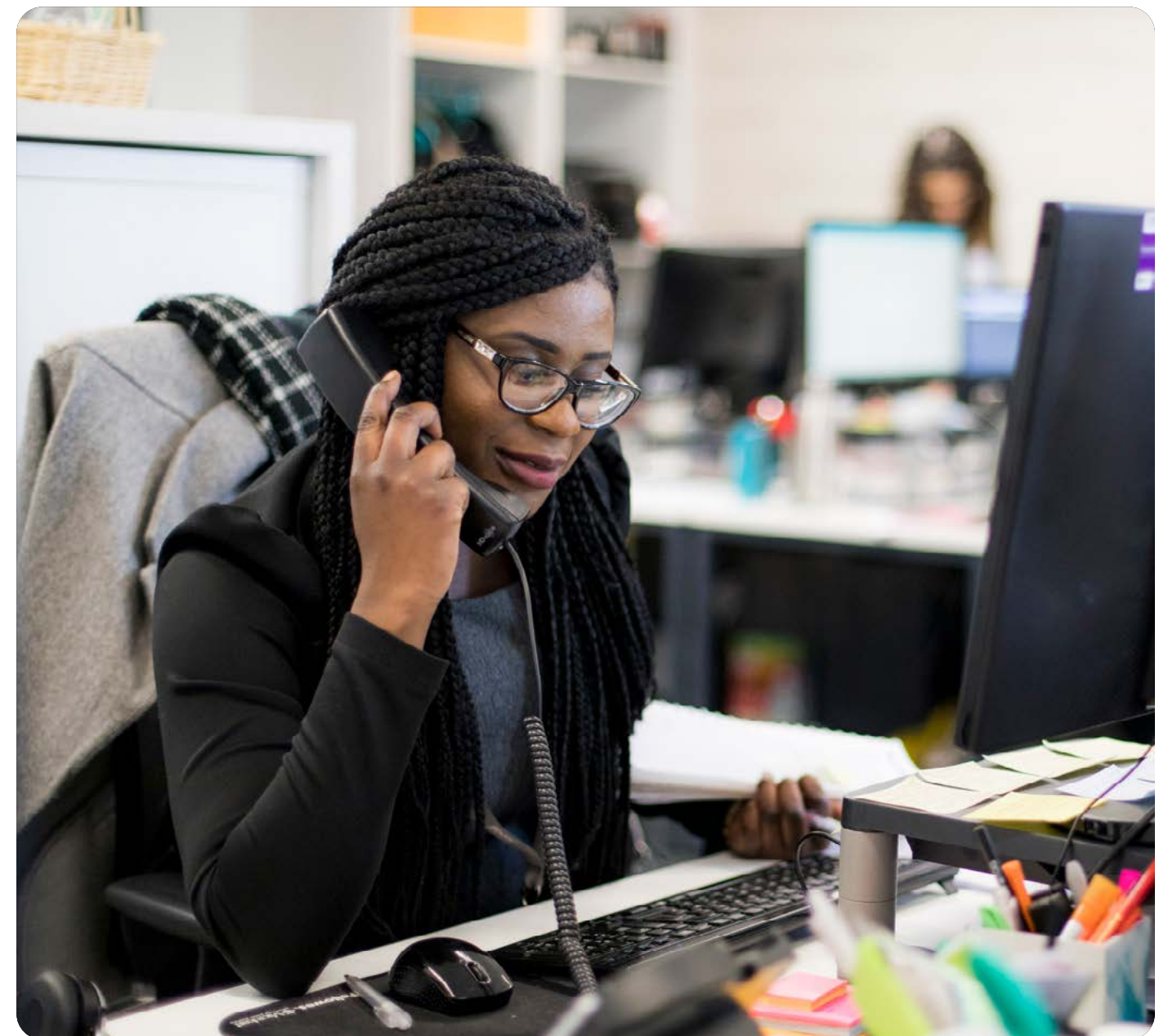
We look to our suppliers to embrace innovation and change within their own businesses, promoting sustainable growth and continuously improving the services they provide to their customers and to Bloom/our clients.

## Non-Compliance to the Code of Conduct

Our supplier relationships are founded on openness, transparency, and trust, including compliance with this Code of Conduct. We ask that you regularly evaluate your day-to-day activities to ensure they align with this Supplier Code of Conduct. We also look to suppliers to apply these standards to their own supply chains.

Our goal is to make this Code of Conduct as straightforward as possible, but we ask that you reach out to us should you feel there are any challenges you face complying with any sections included.

Occasionally, we may conduct surveys and/or audits to confirm compliance with this Code of Conduct. If identified, suppliers must have a process in place to remedy any instances of non-compliance or breaches. We ask that you bring them to our attention immediately so we can work with you to resolve the matter.



## Keep us informed

It is important for us to be aware of any changes within your business that may affect or impact how we work together, now and in the future. We operate in an open and transparent way, and we also expect this of our clients and suppliers alike to maintain effective working relationships for everyone involved.

We look to our suppliers to inform us of any changes within their businesses, including any associated parent or group companies and the supply chain that affects their ability to do business with Bloom or our clients. This includes non-compliance with any areas of this Code of Conduct.

## Reporting concerns

We aim to meet and exceed the expectations of our customers and stakeholders, however, sometimes things do go wrong. When they do, we are committed to providing a simple, effective route for employees and customers to raise concerns.

Any concerns a supplier or client may have in relation to a fellow supplier's adherence to this Supplier Code of Conduct can be submitted to us in the following ways:

By email: [legalteam@bloom.services](mailto:legalteam@bloom.services)

By phone: 020 3948 9400

By post: Point 5, New Eden House, Fletcher Road, Gateshead, NE8 2ET





