



# DBS

Air Conditioning \ Refrigeration \ Heating \ Electrical and Controls

## DBS Group – Supplier Code of Conduct

DBS Group works towards successful supplier relationships built on trust, honesty and expected behaviour. The DBS Group Code of Conduct (our Code) outlines the behaviours we expect from our employees. This DBS Group Supplier Code of Conduct (our Supplier Code) outlines the behaviours we expect from our supply chain.

### DBS Group Values

DBS Group is committed to conducting business in a responsible and sustainable way. We expect our suppliers to make the same commitment. Our employee and supplier codes of conduct are based on our DBS Group values: -

#### *Care for Life*

- We care for the environment and people.
- We support health and wellbeing.
- We work safely, or not at all.
- We never walk by if we notice unsafe actions.
- We are accountable to future generations.
- We promote green solutions and or incorporating green solutions in our working.

#### *Act Ethically and Transparently*

- We do business with honesty and transparency.
- We adhere to our Code of Conduct.
- We promote a working environment where everyone can speak their mind.

#### *Be Better – Together*

- We build open and honest relationships with our customers, suppliers, partners and community.
- We promote an inclusive culture where we are open and fair, showing trust and respect for each other.
- We always strive to be better in all we do.
- We look to deliver the best solutions taking account of the environment, cost and efficiency.

#### *Commit to Customers*

- We take time to understand our customers' requirements to deliver the best solution.
- We strive to turn our customers' visions into reality.
- We aim to deliver our projects on budget and in agreed timescales to ensure efficiency and cost-effectiveness.

DBS Group adhere to United Nations (UN) Global Compact Ten Principles reflecting human rights, labour, the environment and anti-corruption.



# DBS

Air Conditioning \ \ Refrigeration \ \ Heating \ \ Electrical and Controls

## Who the Code applies to

This Supplier Code of Conduct applies to those who supply goods and services (and their employees) via contractual agreements with DBS Group. It is not necessarily applicable to organisations where there is not a framework agreement.

In this policy “Suppliers” means suppliers, subcontractors, service providers, intermediaries and consultants. As a supplier, we would like you to ensure that the practices and principles outlined in our Supplier Code form part of your own supply chain.

## Compliance with laws

We expect our suppliers to adhere our Supplier Code and all applicable laws. Customs or local practices never take precedence over legal requirements. If you find that our Supplier Code contradicts applicable legal requirements, you should inform the relevant DBS Group manager.

## Reporting misconduct

We are committed to investigating reports of suspected or known misconduct, and to taking appropriate action based on our findings. We ask that our supply chain and their employees report suspected or known misconduct to us to investigate.

Suspected or known misconduct must be reported by speaking with the relevant DBS Group manager for which you are working. Alternatively, you may report suspected or known misconduct confidentially to the DBS Group by email to [info@dbs.uk.com](mailto:info@dbs.uk.com).

There will be no reprisals for anyone reporting suspected or known misconduct in good faith. Similarly, our suppliers should not retaliate or tolerate retaliation against anyone who reports suspected or known misconduct in good faith.

“Good faith” means that to the best of a person’s knowledge and belief, everything reported is true and that everything known is reported.

## Assessment

DBS Group reserves the right to assess each supplier’s compliance with our Supplier Code. We ask that you cooperate by providing the information that we request so that we can conduct our assessment.

We ask that you audit your supply chain to ensure compliance with our Supplier Code. Any non-compliance by you or your supply chain must be effectively remedied both in a timely manner and at no additional cost to us or our customers.

Breaches of the Supplier Code may have a negative impact on your business relationship with DBS Group, which may result in the termination of contract.



# DBS

Air Conditioning \ Refrigeration \ Heating \ Electrical and Controls

## Health, safety and wellbeing

We care for our people and the people affected by our workplaces, and we have developed a work environment that promotes health, safety and wellbeing. We are aiming towards a goal of an injury-free environment.

We promote and share sound personal safety and accident prevention practices with our supply chain and throughout our industry.

### *What does it mean to you?*

- You work together with DBS Group and other suppliers to ensure a healthy and safe working environment.
- You ensure that your employees are adequately trained and provided with the proper equipment to safely carry out their work.
- You recognise that all employees have a right and an obligation to stop unsafe work.
- You report to DBS Group all health and safety incidents related to our project sites and in our workplaces.

## Fair working conditions

We reinforce fair working conditions and human rights for the people working on our sites, workplaces and throughout our supply chain. DBS Group have a policy regarding Modern Slavery and Human Trafficking they adhere to.

### *What do we expect from our supply chain?*

- You ensure that working conditions, hours, wages and benefits comply with applicable national and local law.
- You have zero tolerance for any form of human trafficking or child, forced or compulsory labour, including such practices as the unlawful or illegitimate withholding of wages. A child is anyone below the age of 15, or below any higher minimum age specified by local law.
- You do not allow any practice that would restrict free movement of employees. Such practices can include requiring employees to hand over identification documents, passports or work permits as a condition of employment.
- You recognise the special needs of employees under the age of 18, and your duty of care towards them.
- You have a Modern Slavery and Human Trafficking policy in place you adhere to.
- You conduct right-to-work checks of your work-force in accordance with the Immigration, Asylum and Nationality Act 2006.

## No discrimination or harassment

We respect all individuals and we provide equal treatment and employment opportunities, and we do not tolerate any form of harassment or discrimination.

### *What do we expect from our supply chain?*

- You do not discriminate, and you provide fair and equal treatment and opportunities for all employees and job applicants.



# DBS

Air Conditioning \ Refrigeration \ Heating \ Electrical and Controls

- You do not tolerate bullying, discrimination, harassment or unwanted sexual advances or other disrespectful behaviour.
- You embrace and promote an inclusive culture.

## Environment

We are committed to protecting the environment and believe that we can contribute to a more sustainable world. We are constantly seeking ways to improve the environmental performance of our operations, projects and services during their entire life cycles.

### *What do we expect from our supply chain?*

- You conduct your operations in an environmentally responsible manner and in accordance with applicable environmental laws.
- You actively work towards minimising your own adverse impact on the environment.

## Protection of assets, property and equipment

We safeguard and protect our assets from damage, theft, loss and misuse, as they are essential to our business. Our assets comprise of tangible assets - equipment, money, products, machines and vehicles, computers and property, and intangible assets – our brand and trademarks, know-how, trade secrets and copyrights.

### *What we expect from our supply chain?*

- You respect the assets of DBS Group and our stakeholders.
- You seek and obtain permission from DBS Group before using or disclosing our assets.
- You do not tolerate the theft of assets.

## Confidentiality and Protection of Personal Data (data protection)

We protect confidential information relating to DBS Group and our customers or suppliers and take all reasonable measures to secure it and prevent unauthorised disclosure. Confidential information can also include personal data (including names, addresses, photographs and identification details). Our privacy policy covers how we use and protect personal data.

### *What we expect from our supply chain?*

- You secure confidential information provided to you by DBS Group, our customers and others.
- You do not act on confidential information received in error, whether it has come from DBS Group, our customers or others. You contact the sender and disclose the situation to DBS Group.
- You ensure that all uses of personal data – such as collection, storage and deletion, or a combination of these – take place in accordance with applicable laws and regulations.

## Anti-corruption and anti-bribery

We are committed to conducting business with a high level of integrity and we do not tolerate any form of bribery or corruption. Bribery and corruption can include (but is not limited to) kickbacks, extortion, fraud, embezzlement and money laundering, nepotism (family) or cronyism (friends).

We do not request, accept, offer, authorise or provide hospitality or gifts that may improperly



# DBS

Air Conditioning \ Refrigeration \ Heating \ Electrical and Controls

influence – or create the appearance of improperly influencing – our business decisions, or decisions by our customers or others with whom we work. We have established a hospitality and gifts policy that outlines acceptable circumstances and monetary limits for hospitality and gifts.

### *What we expect from our supply chain?*

- You conduct all aspects of business with a high level of integrity, and you do not tolerate any form of bribery or corruption.
- You never request, accept, pay, offer or authorise bribes, either directly or indirectly, under any circumstances. This includes never seeking to improperly influence or bribe a DBS Group employee, customer, or public official (including foreign public officials).
- You do not offer or make facilitation payments, nor do you permit others to offer or make such payments on your behalf.
- You ensure all reports, records and invoices are complete and accurate and not false or misleading.
- You do not offer or accept hospitality or gifts that may improperly influence – or create the appearance of improperly influencing – your business decisions or those of DBS Group, our customers or others.
- You respect and observe our hospitality and gifts policy.
- If a DBS Group employee requests any type of hospitality, gift or personal service for free or at less than fair market value, you report it to DBS Group.

### Fair competition

We believe fair competition drives efficiency and innovation and are committed to fair competition and do not tolerate any violation of antitrust laws, competition laws or related regulations.

When acting as a representative of an employer, customer or other party, we are responsible for making decisions in the best interests of them without consideration of personal gain.

### *What we expect from our supply chain?*

- You practise fair competition.
- You do not participate in activities that limit fair competition in tender situations.
- You do not participate in form price fixing activities with competitors or other parties.

### Conflict of interest

DBS Group aims to operate in a manner in which conflicts of interests are actively avoided, and we require our supply chain to do the same.

### *What we expect from our supply chain?*

- When involved in activities for DBS Group you avoid situations that present a conflict of interest or appear to do so.
- You notify DBS Group if you become aware of an actual or perceived conflict of interest in your work with DBS Group.