



Supplier Code of Conduct

This Code of Conduct (the “**Code**”) applies to all persons delivering goods and/or services to Oxford Policy Management Limited and/or its offices worldwide (referred to in this Code as the “**Supplier**”). If you are a Supplier company or other legal entity, the Code also applies to your directors, staff, agents and sub-contractors/delivery chain partners, if applicable (referred to as the “**Supplier Personnel**”). References in the Code to “**I**” “**my**”, “**myself**”, “**you**” and “**your**” and “**their**” are references to the “Supplier” and “Supplier Personnel” as applicable. Oxford Policy Management Limited and its international offices are collectively referred as “**OPM**” and references to “**we**”, “**us**” and “**our**” are to OPM).

By accepting your engagement with OPM, you undertake to discharge your duties and regulate your conduct in line with the behaviours and standards set out in the Code (the “**Standards**”). The Code is designed for (i) your guidance and protection; and (ii) the protection of OPM against the risk of financial loss and/or reputational damage.

A breach of the Code may result in suspension of your services or termination of your contract with OPM. In some instances, it may also lead to criminal prosecution.

The Code reflects OPM’s fundamental aims and values and seeks to ensure that wherever the company operates, its Suppliers maintain the highest standards of behaviour and conduct at all times.

The Code may be amended from time to time and you will be notified of any changes.

OPM’s Values

We enable strategic decision-makers to identify and implement sustainable solutions for reducing social and economic disadvantage. OPM is united by three core values - we are ambitious, we strive for positive impact, and together we make a difference.

Standards of Behaviour and Conduct

As an OPM Supplier, I shall and, if applicable, procure that Supplier Personnel shall:

1. Uphold the integrity of OPM by ensuring that personal and professional conduct is, and is seen to be, of the highest standard in keeping with OPM’s aims and values.

In particular, without limitation:

- I accept that I am accountable for actions and decisions I take;
- I undertake not to abuse my position for personal gain, make false expense claims or claims in respect of alcohol or tobacco or similar items;
- I will not work under the influence of alcohol or use, or be in possession of illegal substances on OPM’s premises, or whilst providing goods or services to OPM; and
- I agree that OPM may, and has the right to, conduct searches at any location under my control used for the provision of the services including searches of any locker, desk or computer. I understand that I may request the presence of another individual at the time of any search, which will only be carried out by a duly authorised person in the presence of a witness.



2. Refrain from and seek to prevent any form of abuse, harassment, discrimination, intimidation or exploitation, and treat all people with dignity and respect.

In particular, without limitation:

- I will not engage in any exploitative, abusive or corrupt relationships including any exploitative, or abusive or corrupt behaviour that involves a vulnerable person;
- I will not offer employment, money, goods or services for any form of humiliating, degrading or exploitative behaviour;
- I will contribute to a working environment characterised by mutual respect, integrity and dignity for all;
- I will not engage in or permit any behaviour which may adversely affect OPM's reputation. This includes any internet-based activity, including on social media sites and blogs;
- I will not abuse or exploit any individual in any way and will report any such behaviour of others to OPM in line with supporting policies and procedures (such as the Anti-slavery and Human Trafficking Policy, Whistleblowing Policy and Safeguarding Policy) and where necessary, the appropriate authorities; and
- I will report any complaints, concerns and or incidents concerning exploitative, abusive or corrupt behaviour or any attempted or threatened exploitative, or abusive or corrupt behaviour to OPM. Reports can be made confidentially using any of the following external mechanisms:

Your report can be made confidentially using any of the following external mechanisms:

- Calling the whistleblowing hotline number for your location (available on OPM's intranet and website)
- Calling OPM's external whistleblowing hotline from the UK on 0800 890 011 followed by 833-945-3461 when prompted
- Completing the web reporting form at opml.ethicspoint.com
- Emailing or calling the client's reporting mechanism e.g. for UK FCDO, the Counter Fraud and Whistleblowing Unit (CFWU) at reportingconcerns@fcdo.gov.uk or on +44(0)1355 843747

Furthermore, I will not:

- Engage in sexual activity with anyone under the age of 18 (regardless of the local age of majority or age of consent or any mistaken belief held by the Supplier or Supplier Personnel as to the age of the person);
- Sexually abuse or exploit children;
- Subject a child to physical, emotional or psychological abuse, or neglect;
- Engage in any commercially exploitative activities with children including child labour or trafficking;
- Sexually abuse or exploit at risk adults;
- Subject an at-risk adult to physical, emotional or psychological abuse, or neglect;



- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of any services related to an OPM programme;
- Engage in any sexual relationships with beneficiaries of OPM services or other activities related to us, since they are based on inherently unequal power dynamics; or
- Use unequal power relationships for personal gain.

Furthermore, I will:

- Avoid engaging in any activities which might lead to, or suggest, a breach of OPM's Modern Slavery Policy.
- Raise concerns about any issues or suspicions of modern slavery in any parts of the organisation or supply chain at the earliest possible opportunity.

3. Perform my duties and conduct my private life in a manner that avoids possible conflicts of interest with OPM, its work and clients.

I shall take all reasonable steps to avoid any potential or actual conflicts of interest between myself and OPM and its clients and the services provided by myself to OPM and those for OPM's other clients. I shall avoid knowingly committing any acts which are likely to result in an allegation of impropriety against OPM, including conflicts of interest, which are likely to prejudice my independence and objectivity in performing the contract with OPM. I shall inform OPM in writing as soon as I become aware of a potential or actual conflict of interest.

4. Take a zero-tolerance approach to all forms of bribery and corruption.

In particular, I:

- shall not accept benefits that I am not contractually entitled to, attempt to bribe officials or any other person, receive bribes or fail to prevent bribery that I am aware of;
- shall not accept gifts or any form of remuneration or payment from governments, donors, other Suppliers and other persons, which have been offered to as a result of, or in connection with the services supplied to OPM and shall inform OPM in writing immediately if any such gifts or payments are offered or proposed (this does not apply to one-off small tokens of appreciation, such as flowers or a bottle of wine of a nominal value); and
- shall not to request any service or favour from others in return for assistance by OPM.

OPM encourages reporting of fraud and corruption. I am aware that I can report suspected fraud or corruption by calling the EthicsPoint hotline number which is available on OPM's website and intranet or using OPM's web reporting system at opml.ethicspoint.com.

If I am providing services to OPM in connection with a contract funded by FCDO, I can report all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance to the Counter Fraud and Whistleblowing Unit (CFWU) at reportingconcerns@fcdo.gov.uk or by calling DFID's confidential hotline on +44(0)1355 843747.



5. Be responsible for the proper use of information, equipment, money and resources to which I have access by reason of my contract for goods/services with OPM.

I shall:

- comply with my obligations under the law in relation to the processing or personal data and, OPM's policies and procedures regarding its personal data and confidential or proprietary information;
- work within agreed authorisation levels before communicating externally in OPM's name or in relation to the services;
- appropriately account for all OPM or client money and property, (e.g. vehicles, office equipment, computers including the use of internet, email and intranet); and
- ensure the highest standards are maintained when dealing with OPM client' personal data, confidential information and or proprietary information received by me during the course of providing services to OPM in line with existing OPM policies and procedures which have been brought to my notice.

6. Protect the health, safety, security and welfare of myself, Supplier Personnel (if applicable) and OPM Employees.

- I shall comply with local security management guidelines and be proactive in informing OPM of any necessary changes to such guidelines; and
- I shall take all steps necessary to avoid any unnecessary risk to the safety, health and welfare of Supplier Personnel, if applicable, and others.

7. Avoid involvement in criminal or unethical activities, those that contravene human rights or damage the environment, or that compromise the work of OPM.

- I shall be sensitive to, and aware of, customs and culture in places where I work and of those I work with, except where those customs or cultures significantly conflict with this Code.
- I shall notify OPM of any relevant criminal convictions or charges including those of any Supplier Personnel, if applicable, prior to entering into a contract with OPM, or if I, or any Supplier Personnel if applicable, face any criminal charges and/or private legal action during the course of my contract with OPM.

8. In the event that I do not have similar policies and procedures in place or OPM deems my existing policies and procedures to be inadequate, I shall adhere to OPM's policies and procedures which include but are not limited to the following policies (as amended from time to time):

Policy	
1.	Anti-Bribery Policy
2.	Anti-facilitation of Tax Evasion Policy
3.	Anti-Harassment & Bullying Policy
4.	Anti-Slavery & Human Trafficking Policy
5.	Code of Conduct (Suppliers)



6.	Conflict of Interests Policy
7.	Brand and Communications Policy
8.	Counter Terrorism Statement
9.	Data Ownership & Usage Policy
10.	Data Protection Policy
11.	Duty of Care Policy
12.	Environmental Policy
13.	Equal Diversity and Inclusion Policy
14.	Media Engagement Policy
15.	Physical Security Policy
16.	Risk Management Statement
17.	Safeguarding Policy and Handbook
18.	Whistleblowing Policy

OPM requires all of its Suppliers and Supplier Personnel to comply with this Code and reserves the right to check compliance at any time. The Supplier is responsible for conveying this Code to its Supplier Personnel and ensuring compliance throughout its delivery chain.

Any breach of the obligations stipulated in this Code is considered a material breach of contract by the Supplier and may lead to a termination of the relationship with OPM. However, our preference is to work collaboratively with our Suppliers to identify any issues and to ensure that appropriate remediation steps are taken promptly. OPM encourages its Suppliers to engage with OPM at the earliest opportunity if it becomes aware of any difficulty in complying with this Code. You can raise your concerns with your usual contact at OPM or through the whistleblowing procedures.

Declaration

I have read and understand the OPM Code of Conduct and hereby commit to abide by its requirements and uphold the Standards of conduct required to support OPM's aims and values.

Full Name:

Signature:

Date:



Code of Conduct

Document Purpose:

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Policy Overview			
Policy Owner	General Counsel and Company Secretary		
Applies to	OPM Suppliers		
Global or local scope	Global		
Version Number	2.3	Effective from	
Approvals (Dates)	Board		
	Global Policy Approvals Committee	N/A	
	Other (please state)	N/A	