



# Bell Integration SI Supplier Charter

Expectations of suppliers to Bell  
Integration - SI

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# Bell Integration Supplier Charter

Driving Digital Transformation



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# Introduction

*Stuart McMinn, Chief Technology Officer*

*'At Bell Integration we hold ourselves to high standards and these standards reflect our internal values and the expectations of our external stakeholders such as customers, suppliers, and the public. We seek relationships with suppliers who share a common commitment to comply with applicable laws and regulations, behave ethically, sustainably and with integrity and amongst other things promote the safety, health and well-being of employees.*

*Our suppliers are essential contributors to our success and this Charter helps you to understand the standards that we hold ourselves to and our expectations of you.*

To the extent that our contractual arrangements contain more detailed requirements in respect of any principles covered in this Charter, this Charter is intended to supplement (and not override) those contractual obligations.

In some circumstances, we may require our suppliers to complete self-assessments and/or an annual declaration which confirms their compliance with this Charter. Our suppliers must promptly notify us if they, or another party in their supply chain, becomes aware or reasonably suspects that it is unable to comply with the principles in this Charter.

If a supplier, or another party in its supply chain, is unable to, or fails to, comply with this Charter, we will request the supplier to take immediate remedial action reasonably necessary to address the impact of the non-compliance.

If local legislation, regulation, or laws provide a higher level of protection than which is included in this Charter, the local legislation will take precedence. We reserve the right to amend the Charter from time to time.

## **Compliance with Laws**

We expect our suppliers to comply with all relevant laws, codes and regulations, and to act in an ethical manner. As such, suppliers must:

- Comply with all applicable laws, codes and regulations wherever they operate including maintaining accurate records, which Bell may audit upon reasonable notice.
- Promptly notify us of any significant criminal or civil legal actions brought against them; and
- Promptly notify us of any fines or administrative sanctions brought against them which relate in any way to the requirements set out in this Charter.

## Health and Safety

Our suppliers must maintain a safe workplace and implement continuous improvement and management systems to ensure compliance and effective controls.

We expect our suppliers to take all reasonable steps to protect the emotional and physical health and wellbeing of their workforce and provide all necessary supervision, training, instruction, equipment, appropriate flexible working arrangements and information to their workforce and consult on issues that may affect health and safety. Suppliers must comply with local site rules for visits, deliveries or provision of services.

We require suppliers to demonstrate that they have the relevant **Health and Safety policies** in place or **ISO 45001**.

## Environment and Sustainability

Suppliers are expected to operate in a sustainable and environmentally responsible manner, complying with all regulations, reporting requirements in accordance with good industry practice for their industry. We may require suppliers to demonstrate that they have relevant practices and policies in place.

Suppliers are expected to support the delivery of our environmental, social and governance (ESG) objectives by promoting socially responsible, sustainable procurement and supply chain management practices, and by agreeing to integrate ESG considerations into their design and/or provision of services.

We encourage our suppliers to engage the community to help foster social and economic development, contributing to the sustainability of the communities in which they operate and to offer solutions that improve the resilience of our operations, whilst also understanding how their own business needs to adapt to a changing climate.

We require suppliers to demonstrate that they have suitable **Environmental policies** in place or **ISO 14001** as well as appropriate **Quality policies** or **ISO 9001**.

## Modern Slavery

Suppliers are expected to treat people with dignity and respect. As such, they shall:

- Comply with our Anti-Slavery Human Trafficking Policy.
- Not engage in any form of human trafficking or use forced labour.
- Not use misleading or fraudulent recruiting practices, use recruiters that do not comply with local labour laws in the country where the recruitment takes place, expect workers to pay for a job, provide housing that does not meet the standards of the country where work is performed, or fail to provide an employment contract or recruitment agreement if required by law.
- Ensure that workers have freedom of movement and are free to leave their employment after reasonable notice.
- Immediately return any workers' government-issued identification, passports or work permits once they have confirmed workers' identities or working rights (to the extent that this is required).

We require suppliers to demonstrate that they have the relevant **Anti-slavery policies** in place.

## Child and Underage Labour

Suppliers shall not use child labour. "Child" means any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

Individuals under the age of 18 must not be employed for any hazardous work or work that is inconsistent with their personal development.

### **Working Hours, Wages and Benefits**

Suppliers shall ensure the working hours of the supplier's workforce does not exceed the maximum set by local law and shall include the minimum breaks, and rest periods and time off between the end of one shift and the start of another, set by law. Workers shall be allowed at least one day off every seven days.

Suppliers shall be considerate to the type of work performed and the acceptable working hours for the relevant role.

Suppliers shall ensure its workers are provided fair wages and benefits that are in accordance with applicable laws, industry standards and collective agreements. Wages shall be paid in a timely manner.

Suppliers shall not use deductions from wages as a disciplinary measure.

We require our suppliers to ensure that all members of their workforce understand their employment conditions and when determining these, consideration should be given to the type of work to be performed, the market rate for that type of work and any statutory minimum wage in that country.

### **Freedom of Association**

Our suppliers must respect the rights of members of their workforce to be free to decide on joining unions or other similar workers' associations, to the extent permitted by applicable law, and to be free of any discrimination, harassment, intimidation, or victimisation for their choice to join these organisations or engage in other lawful industrial activity.

### **Discrimination, Harassment and Abuse**

We require our suppliers to build an inclusive work environment that is free of harassment and unlawful discrimination and to take prompt action against inappropriate workplace behaviour.

Suppliers shall ensure equal opportunities at any stage of employment, from the selection of suitable applicants, their interview and assessment, to the terms of their employment, remuneration and grounds for dismissal.

### **Gender Diversity and Inclusion**

Our suppliers must foster an inclusive workforce and a culture of respect toward differences in gender, sexual orientation/identity, age, disability, ethnicity or appearance, marital or family status, religious or cultural background or any other protected attribute.

Our suppliers must encourage women's equality and safety and we may require Suppliers to demonstrate that they have the necessary support arrangements in place to promote gender equality, equal access, and the empowerment of women.

### **Anti-bribery, Anti-corruption and Whistleblowing**

We require suppliers to demonstrate that they have relevant Anti-Bribery and Anti-Corruption policies in place. Our suppliers must comply with all applicable laws including, where relevant, the UK Bribery Act 2010 and any other laws relating to the prevention of bribery, corruption, fraud, tax evasion or similar or related activities.

Monitoring and enforcement procedures shall be implemented by the Supplier to ensure compliance with anti-bribery laws.

Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorised, given, or accepted, this includes facilitation payments. This prohibition covers promising, offering, authorising, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

Suppliers shall not offer our employees any gifts, payments, fees, services, discounts, valued privileges or other favours where these would, or might appear to, improperly influence them in performing their duties. Our employees can be offered common courtesies normally associated with accepted business practices, so long as these are offered openly and not in a form that could be construed as a bribe, payoff, or secret compensation.

We require our suppliers to have processes in place to ensure workers may report concerns or illegal activities in the workplace in good faith without threat of reprisal, dismissal, intimidation, or harassment.

Suppliers shall report any instances of illegal or unethical behaviour or breaches of this Charter (in relation to the goods and services being provided to us) in accordance with our whistleblowing policy

### **Competition and Anti-Trust**

Our suppliers should ensure they conduct their business in compliance with all applicable antitrust and competition laws and prohibit anti-competitive behaviour by either individual players acting alone or multiple players acting together.

Suppliers certify that their prices and methods for calculating prices have been arrived at independently, that the information has not been and will not be shared with any competitor, and that the supplier has not induced and will not induce any other concern to submit or not to submit an offer for the purpose of restricting competition.

### **Fraud and Money Laundering**

Suppliers shall:

- Act in accordance with all applicable international standards and laws on fraud and money laundering
- Not do or omit to do anything likely to cause any party to be in breach of any of such international standards and laws.
- Maintain an effective anti-fraud and (where appropriate) an anti-money laundering compliance programme, designed to ensure compliance with the law including the monitoring of compliance and detection of violations.

### **Tax Evasion**

Tax evasion involves the deliberate and dishonest use of illegal practices in order not to pay the right amount of tax. This could include not reporting all of your income, deliberately not filing an accurate tax return, hiding beneficial ownership and taxable assets from tax authorities or diverting funds to hide income from local taxation authorities.

Suppliers shall comply with all applicable laws, statutes, regulations, guidance, recognised practice and codes, relating to the prevention of tax evasion and/or the prevention of the facilitation of tax evasion (whether within, or outside of, the United Kingdom) including but not limited to the UK's Criminal Finances Act 2017 ("CFA 2017")

### **Trade Sanctions**

Suppliers should ensure they conduct their business in compliance with all lawful international sanctions' regimes, and that they do not engage with any sanctioned parties. As such, suppliers must:

- Be aware of, and fully comply with, all lawful sanctions regimes affecting their business; and

- Implement effective internal controls to minimise the risk of breaching sanctions, and provide training and support to ensure their workers understand them and implement them effectively, particularly where their work involves international financial transfers or cross-border supply or purchase of products, technologies or services.

### **Data Protection, Privacy and Security**

Information Security is paramount, and we require our suppliers to be committed to protecting the systems and data they store, process or access and to respect the privacy rights of their workforce, and all parties they deal with. This shall include complying with applicable privacy laws/regulations adopted to implement data protection and applicable information security laws.

We may require suppliers to demonstrate that they have the relevant **Information Security Standard ISO 27001** in place and **Cyber Essentials Certification**, as well as agreements necessary for the lawful processing of personal data.

### **Intellectual Property Rights**

We require our suppliers to respect all our confidentiality and intellectual property rights, and to safeguard against improper use of intellectual property, disclosure of confidential or sensitive information, including but not limited to pricing and supply of counterfeit goods. Suppliers should only use our or our third-party confidential information and intellectual property in accordance with their contractual arrangements with us and seek permission from us before sharing any information externally.

### **Land Rights**

It is important that our suppliers respect the legal land rights of individuals, indigenous people, and local communities. Suppliers must be the legal and rightful owner or user of the property on which they operate. Developments and acquisitions of agricultural and forestry land are subject to free, prior, and informed consent of the affected communities, including women or indigenous people and other marginalised stakeholders.

### **Conflict Minerals**

As part of Bell's commitment to corporate and social responsibility and respecting human rights in our own operations and in our global supply chain we support responsible and ethical mineral sourcing, including but not limited to from the Democratic Republic of Congo (DRC) that does not directly or indirectly finance or benefit armed groups and conflict.

We require our suppliers to conduct necessary due diligence that enable us to be reasonably assured that products, components, materials and minerals supplied to us are conflict free and in doing so Bell requires its suppliers to comply with and conduct their business in accordance with all applicable laws and regulations governing the sourcing of conflict materials.

Bell may continue to conduct periodic due diligence and encourage our suppliers to do the same with their supply chain. We expect suppliers to cooperate in providing due diligence information to confirm that materials and minerals within their supply-chain are conflict free.

### **Business Integrity**

Supplier's are expected not to allow any conflicts of interest in their dealings with Bell and to have suitable policies and procedures in place to allow for the effective detection and reporting of any such potential conflicts.



### **Publicity and Advertising**

Our suppliers must uphold standards for fair business practices including accurate and truthful advertising.

Suppliers must not use our or our customers' name or logos in publicity or advertising or use the suppliers' business relationships with us or its customers to imply any endorsement by us of the supplier's goods or services without our written consent.

### **Resilience and Business Continuity**

We require our suppliers to have a sufficiently robust resilience and business continuity programme, appropriate to their business and good industry practice, to protect their business operations from disruptive events that may impact the supply of goods and/or services to Bell and its customers.

Additional risk controls and resilience requirements may be communicated to suppliers depending on the nature of goods or services being supplied.

## Contact us

With over 25 years' of experience and offices across the globe, Bell Integration delivers Data Centre, Cloud and End User services within some of the world's most prestigious customer environments. With capabilities covering technology provision, consulting, project & managed services and asset retirement services, we add value to our customers at several touch points throughout the life-cycle of their IT environments.

Please contact us on  
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