

<b>Policy Name:</b>	<b>Supplier Code of Conduct</b>
<b>Originating/Responsible Department:</b>	<b>Financial Services</b>
<b>Approval Authority:</b>	<b>Senior Management Committee</b>
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<b>Contact:</b>	<b>Director, Strategic Procurement</b>

### **Policy Statement:**

Carleton University recognizes the critical role of its Suppliers and Subcontractors in maintaining ethical, sustainable, and socially responsible business practices throughout its supply chain. As a leading academic institution committed to excellence, integrity, and community engagement, the university has developed this comprehensive Supplier Code of Conduct to outline its expectations and standards for those providing goods and/or services to or on behalf of the university.

### **Purpose:**

The Supplier Code of Conduct serves as the foundation for promoting ethical behavior, environmental stewardship, social responsibility, and integrity within Carleton University's supply chain. Its objectives are to:

- **Establish minimum conduct standards** for suppliers and subcontractors, with the expectation that they will surpass industry benchmarks and best practices.
- **Foster proactive engagement and collaboration** between Carleton University and its suppliers to drive continuous improvement in ethical, social, and environmental performance.
- **Enhance transparency, accountability, and trust** among all stakeholders involved in Carleton University's procurement and supply chain processes.

### **Scope:**

The Supplier Code of Conduct applies to all university departments and units, as well as to suppliers and their subcontractors engaged in providing goods and/or services to Carleton University.

This policy is informed by the provisions of [Bill S-211, the Fighting Against Forced Labour and Child Labour in the Supply Chains Act](#) and is rooted in the principles of the [United Nations Sustainable Development Goals](#). It also acknowledges the work of the [International Labour Organization \(ILO\)](#) and reinforces the Broader Public Sector Supply Chain Code of Ethics as outlined in the [BPS Procurement Directive](#) and the university's Procurement Policy. While this policy reflects current standards and guidelines, it is intended as an example and may be subject to future changes as policies and regulations evolve.

Suppliers should not limit themselves to the standards and expectations outlined in this Code of Conduct. These represent a minimum engagement threshold, and suppliers are encouraged to exceed these standards according to their contractual agreements and specific issues relating to their sphere of activity.

The university reserves the right to include this Code in all contracts with suppliers entered after the effective date of this policy.

### **Procedure:**

#### ***Expectation for Suppliers to Adopt the Code***

Suppliers and their subcontractors engaged in providing goods and/or services to Carleton University are expected to fully embrace and adhere to the standards outlined in this Supplier Code of Conduct.

Suppliers shall undertake to support and cooperate in the implementation and verification of this Code by:

- Informing their workers, both verbally and in writing, in a language they understand about the provisions of this Code.
- Implementing and communicating procedures that allow employees to confidentially and anonymously raise and address workplace grievances without fear of reprisal or retaliation.
- Refraining from any disciplinary action, dismissal, or otherwise discriminating against any worker for providing information related to the observance of this Code.

### ***Standards***

#### **Standard #1: Ethical and Behavioural Standards**

Suppliers are expected to uphold the highest ethical and behavioural standards, complying with all relevant legislation, regulations, and industry best practices. They should promote transparency, integrity, and accountability in all aspects of their operations and throughout their supply chains. Additionally, suppliers should proactively engage in initiatives to foster a culture of ethical conduct and responsible decision-making within their organizations and among their partners.

##### ***1a. Regulatory Compliance***

Suppliers must fully comply with all applicable regulatory obligations that apply to all their activities, whether they are carried out domestically or internationally. This includes demonstrating integrity and transparency in their commercial practices, notably by respecting legislation, regulations, and local, regional, national and international codes governing the release of information on their commercial activities, organizational structure, and financial status.

In regions where local legislation or regulations differ from international conventions, the university expects its suppliers to adopt the most rigorous and ambitious standards.

*1b. Ensure Fair Competition*

Suppliers are expected to promote fair competition among subcontractors by refraining from sharing privileged information, terms and conditions, bidding strategies, or any other information that may impede free and open competition.

*1c. Avoid Conflicts of Interest*

Suppliers must adhere to Carleton University's governing Conflict of Interest policies and regulations in all interactions with the university. This includes maintaining transparency and impartiality in their dealings with the University to prevent any potential conflicts of interest.

*1d. Protect Data and Sensitive Information*

Suppliers will take all necessary measures to safeguard Carleton University's data, including personal information and sensitive corporate data, from misuse, theft, fraud, or unauthorized disclosure. Compliance with relevant data protection laws and regulations is mandatory.

*1e. Avoidance of Bribery and Kickbacks*

Suppliers must not engage in any form of bribery or offering benefits to Carleton University's staff or their family members to gain undue influence or secure business opportunities. Such practices undermine the integrity of the procurement process and are strictly prohibited.

**Standard #2: Environmental Responsibility**

Suppliers are expected to operate in an environmentally responsible and resource-efficient manner, adhering to all relevant legislation, regulations, and industry best practices. Additionally, suppliers should actively engage in initiatives to promote environmental responsibility within their own organizations and throughout their supply chains.

*2a. Reduce Greenhouse Gas Emissions*

Suppliers are required to make significant efforts to minimize their greenhouse gas emissions wherever possible. This includes implementing processes to monitor, measure, and assess emissions, contributing to Carleton University's Carbon Neutral targets and aligning with global sustainability objectives of achieving net zero by 2050.

*2b. Waste Reduction and Management*

Suppliers will establish and maintain robust systems for safely handling, storing, reusing, and properly managing waste, wastewater, and air emissions. These systems shall prioritize protecting human health and biodiversity, while ensuring compliance with all relevant environmental regulations and standards.

Suppliers are also expected to take proactive steps to reduce landfill waste and support Carleton University's zero-waste goals by adopting the principles of a circular economy: optimizing resource use, minimizing raw materials consumption, and recovering waste through recycling or repurposing it into new products.

*2c. Promote Biodiversity and Responsible Resource Management*

Suppliers are expected to use natural resources in an environmentally sustainable manner, avoiding practices that contribute to deforestation and ecosystem degradation. Additionally, suppliers should avoid conducting activities in areas of high biodiversity value to minimize their environmental impact and support the preservation of biodiversity.

**Standard #3: Social Responsibility**

Suppliers are expected to demonstrate a strong commitment to social responsibility by adhering to relevant legislation, regulations, and industry best practices. They should ensure fair labour practices, support community development, and uphold human rights throughout their operations and supply chains. Additionally, suppliers should proactively undertake initiatives to foster social equity, inclusivity, and well-being for all stakeholders involved in their business activities.

*3a. Human Rights Support*

Suppliers must actively support and uphold human rights conventions, ensuring compliance with international standards and regulations. If any human rights abuses are identified, suppliers must promptly notify Carleton University and take immediate corrective action in accordance with applicable laws and regulations.

*3b. Labour Rights*

Suppliers must respect the Fundamental Principles and Rights at Work and [11 fundamental instruments of the International Labour Organization \(ILO\)](#), including:

- i. Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)
- ii. Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
- iii. Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol )
- iv. Abolition of Forced Labour Convention, 1957 (No. 105)
- v. Minimum Age Convention, 1973 (No. 138)
- vi. Worst Forms of Child Labour Convention, 1999 (No. 182)
- vii. Equal Remuneration Convention, 1951 (No. 100)
- viii. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- ix. Occupational Safety and Health Convention, 1981 (No. 155)
- x. Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187)

### *3c. Promotion of Supplier Diversity*

Suppliers are encouraged to engage with a diverse range of socially and economically disadvantaged suppliers through inclusive sourcing processes that ensure equal opportunities for all. Additionally, suppliers should integrate these principles into their human resources practices to promote fairness and equality in recruitment, retention, and promotion processes.

### **Standard #4: Animal Welfare**

Suppliers whose operations or supply chains involve animals must adhere to best practices for animal welfare. They should ensure their activities align with the internationally recognized [Five Freedoms for Animals](#):

- i. Freedom from hunger and thirst
- ii. Freedom from discomfort
- iii. Freedom from pain, injury or disease
- iv. Freedom to express normal behaviour
- v. Freedom from fear and distress

Where local animal welfare laws and regulations differ from the Five Freedoms, the stricter requirements shall prevail and must be respected by suppliers and subcontractors of the university.

### ***Compliance and Remediation***

Compliance with this Code is a fundamental contractual obligation for both Carleton University and its suppliers. The university expects all its suppliers to fully respect and strive to meet or exceed the standards set forth in the Supplier Code of Conduct. Carleton University is committed to collaborating with suppliers to enhance performance as needed, however In instances of non-compliance, Carleton University reserves the right to implement corrective actions, which may include remediation measures or, if necessary, termination of the supplier relationship.

### **Roles and Responsibilities:**

Clearly defining and communicating the roles and responsibilities of all parties is crucial for ensuring a mutual understanding and commitment to the standards set forth in the Supplier Code of Conduct. This promotes responsible business practices throughout the entire supply chain.

### ***Suppliers and Subcontractors***

Suppliers and subcontractors engaged in providing goods and/or services to the university are responsible for implementing and adhering to the standards outlined in this Code. They must regularly monitor their compliance, promptly address any violations and maintain the integrity of the partnership. Any instances of non-compliance must be reported to the university

immediately. Suppliers and subcontractors are prohibited from making any claims of compliance with this Code without explicit authorization from Carleton University.

***Procurement Services***

Procurement Services oversees and facilitates university procurement processes, negotiates contracts, and maintains vendor relationships in alignment with the university's policies, standards, and regulatory requirements. This includes integrating the Supplier Code of Conduct into contracts, providing clear communication and training to suppliers to ensure their understanding and adherence to these standards, and addressing instances of non-compliance.

***Energy and Sustainability Services***

In collaboration with Procurement Services, the Energy and Sustainability Services team plays a key role in advancing the university's environmental and social responsibility initiatives. This group is responsible for researching and benchmarking best practices, collecting detailed information from suppliers, and ensuring compliance to sustainability standards. Energy and Sustainability Services mitigates risks, promotes transparency, and aligns the supply chain with the university's sustainability goals and values by actively engaging with suppliers to enhance their practices and facilitating training and communication to foster a shared commitment to sustainable operations.

***Employees and Individuals conducting business on behalf of Carleton University***

Faculty, staff, and students engaged in purchasing or acquiring services on behalf of the university must act in the university's best interests. They are required to perform due diligence to ensure that goods and services are acquired responsibly and in compliance with the standards. This includes verifying that suppliers adhere to the outlined standards and striving to obtain the best value for money.

**Contacts:**

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**Links to related Policies:**

[Procurement Policy](#)

[Sustainability Policy](#)