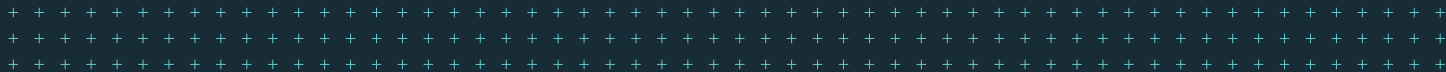


Portakabin®



SUPPLIER CODE OF CONDUCT



INTRODUCTION

This Supplier Code of Conduct has been designed both to introduce you to the Portakabin business and to provide insight into how we operate on a day to day basis.

Portakabin seeks excellence in every aspect of its business and is committed to minimise the social, environmental and ethical impacts of its supply chain. We must all follow and understand applicable laws and relevant company policies and procedures.

Our Third Party Representatives who carry out business on our behalf, whether directly or indirectly, must also understand and follow applicable laws, policies, procedures and good practice relevant to conducting that business.

Portakabin believes in establishing fair and equitable relationships with its suppliers, manufacturers, contractors, partners, agents, distributors and consultants (referred to in this Code of Conduct as "Suppliers") whose behaviours reflect our own ethical standards. This Code of Conduct clearly defines the requirements of all parties in this regard.



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APPLICATION

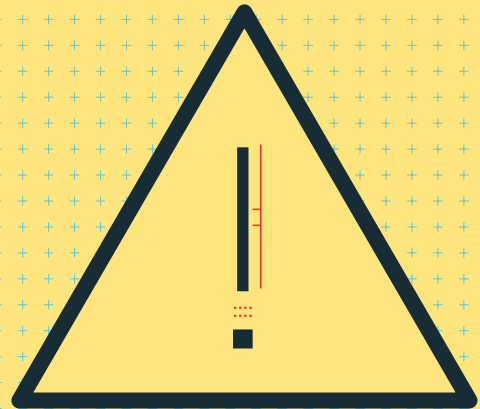
All Suppliers to Portakabin are required to adhere to this Code of Conduct.

Failure to follow this Code of Conduct may have detrimental consequences for both Portakabin and any colleagues concerned. You must not, therefore, ignore or fail to report situations where there is a breach of this Code or any of our policies.



Our speak up service

We encourage the raising of issues and concerns about anything our colleagues, customers and suppliers feel is unethical, unlawful or is simply not right. Reports can be made by calling 0808 234 7287 or online (scan the QR code).



PORTAKABIN VALUES

Our commitment is balanced with clear expectations for behaviour and performance, embodied in our four values:

01

Teamwork

We give everyone a voice

We expect you to actively collaborate and share knowledge in order to promote the best results for Portakabin and our customers. We expect you to encourage others to do the same to ensure everyone is heard.

02

Innovation

We inspire new thinking

We expect you to challenge everyday thinking, keep pushing the standards and to support others to continuously improve.

03

Integrity

We keep our promises

We expect you to be accountable and inspire confidence through your relentless pursuit of customer value.

04

Commitment

We deliver the extraordinary

We expect you to understand our customers, constantly develop your expertise and strive to deliver high quality service and products, on time and on budget at every opportunity.

Further information on our Values can be found [here](#)

RESPONSIBLE BUSINESS APPROACH

Our Responsible Business Approach will help the Portakabin business to grow in a way that's good for people and the environment.

Three key themes underpin our Responsible Business Approach which is integrated to the way we do business. Portakabin is taking a responsible approach to all operations from compliance through to going beyond the expected and creating positive social and environmental value.

Our Customers and Supply Chain

- Build on our market leading reputation to delight our customers with high standards throughout our marketplace.

Our People and Communities

- Build better futures for our people and the societies we serve.

Our Environment

- Build sustainable, cutting edge products which minimise our impact on the environment.



HEALTH AND SAFETY

Our vision is Zero Harm at Portakabin where we prevent injury and ill health to all of our colleagues, contractors, subcontractors, clients, suppliers, visitors and members of the public and prevent pollution and damage to the environment.

Our mission is to create a Zero Harm culture where everyone is engaged to look after themselves, be mindful of other's physical and mental wellbeing and protect the environment.

Our goal is to ensure that everyone has a safe day every day and that we improve our environment. Our policy is to create an environment in which we will achieve Zero Harm. We will achieve this by:

- Ensuring legal, regulatory and business requirements are fulfilled at all times
- Leading and communicating on Health, Safety and the Environment from the highest level.
- Integrating Health, Safety and Environment into business decisions.
- Communicating and engaging with our teams to ensure that everyone understands their role in keeping themselves, their colleagues and their environment free from harm.
- Sustaining processes and forums where colleagues can communicate with the business on Health, Safety and Environmental matters.

- Pursuing opportunities to eliminate hazards, apply the hierarchy of controls and establish robust measures for the management of risk through the provision of sufficient resources.
- Reviewing and assessing Health, Safety and Environmental data to ensure continuous improvement in our performance and management system.

Everyone has the right to

STOP long enough to consider what they or others are about to do;

THINK about whether it is the safest way, if not, how can it be done better? Always;

ACT in the safest way possible, and;

REPORT unsafe events and conditions



STOP



THINK



ACT



REPORT



5 GOLDEN RULES FOR ZERO HARM

**Our goal is to ensure that everyone has a safe day, every day.
Following the 5 golden rules will ensure we are being as safe as we can in everything we do.**

1

Plan ahead and stop if anything changes

Ensure there are planned safe systems of work in place and that work stops if there are changes or if you have concerns over safety.

2

Be ready for work with the right equipment

Ensure you have the appropriate tools and PPE. Advise your Supervisor/ Manager if you have any health issues (mind or body) which mean you are not fit to work.

3

Always receive a briefing before starting work

Only start work if you have been briefed and fully understand the task, associated risks, controls and rules.

4

Report unsafe events and conditions

Intervene if something is not safe, then report what has happened.

5

Protect one another's health, safety and the environment

Always take care of yourself and others. We're all in this together.



HEALTH AND SAFETY 10 KEY RISKS

Portakabin

ZERO HARM

Our goal is to ensure that everyone has a safe day, every day. To help achieve this we have developed 10 Key Risks that we face, and tips on how we can combat them.



Lifting Operations

- 1. Appoint a competent person to plan and manage the lifting operation
- 2. Do not walk under a suspended load
- 3. Ensure loads are secured by competent personnel using certified equipment
- 4. Designate exclusion zones during lifting operations



Transportation Logistics

- 1. Ensure the building is ready to be transported and checks recorded
- 2. Ensure hauliers follow technical guidance for securing the load
- 3. Plan transportation route and check for suitable conditions



Workplace Vehicles

- 1. All plant and equipment must only be used by trained and competent personnel
- 2. Be aware of your surroundings including speed limits, physical restrictions on your routes and ground conditions
- 3. Equipment should be certified and pre/post-use checks completed ensuring all safety devices and features are enabled
- 4. Plant and people interfaces should be eliminated or minimised with clear communication, signage and barriers
- 5. Ensure loads are secure and lifted within Safe Working Load



Working at Height

- 1. Working at height should be avoided where possible and risks assessed
- 2. Inspect all fall protection equipment before use and ensure personnel are competent in its use
- 3. Secure tools and materials to prevent dropped objects
- 4. Ensure that a rescue plan is in place, approved and understood by the work team



Work Environment

- 1. Keep your workplace tidy and free from hazards
- 2. Use designated walkways and crossings
- 3. Use suitable and secure access/egress equipment
- 4. Keep emergency routes clear and fire exits unobstructed



Driving

- 1. Plan your route taking into account weather and traffic conditions
- 2. Perform pre use checks on tyre condition, oil, windscreen wash, wipers and lights
- 3. When driving wear seat belts, respect speed limits and drive according to road conditions
- 4. Do not use mobile phones and other devices unless handheld and business critical
- 5. Do not drive when tired and take regular breaks



Tools and Machinery

- 1. Only operate equipment if you are fully trained, competent and alert and all safeguards are in place
- 2. Ensure equipment is in good working order and suitable for the task
- 3. Position yourself correctly and always wear the correct PPE
- 4. Machinery should be isolated and equipment stored in a safe area when not in use



Environment Impact

- 1. Operate within designated working hours keeping noise and disturbance to a minimum
- 2. Identify areas where possible otherwise segregate waste for recycling
- 3. Store materials where possible otherwise segregate waste for recycling appropriately
- 4. Clean up and ensure spill kits are available
- 5. All work should be conducted where required

Our goal is to ensure that everyone has a safe day, every day. To help achieve this we have developed 10 Key Risks that we face, and tips on how we can combat them.

[Click here to view the full 10 Key Risks Document](#)

STATEMENT OF INTENT

Every individual involved in procurement and supply management processes within the Portakabin organisation will use their best endeavours to ensure that our procurement and contracting activities meet the requirements below:

Society

We are committed to ensuring that there are no acts of modern day slavery or human trafficking within any part of Portakabin and throughout the entirety of our supply chain. Suppliers must ensure that employees, workers and contractor's in their business and supply chain (Tiers 1 downwards) are not subject to modern slavery or human trafficking, including:

Child Labour:

Suppliers must ensure the long-term elimination of child labour, in a manner consistent with the interests of the children concerned.

Forced Labour:

There must be no forced, bonded or involuntary labour and no workers are required to lodge "deposits" or identity papers with their employers and should be able to leave after giving reasonable notice.

We therefore require our suppliers to have in place an auditable process which demonstrates their commitment to the eradication of modern day slavery and human trafficking.

We expect our suppliers to adopt and demonstrate the following standards of social compliance;

Health, Safety and Hygiene:

All employees should expect to work in an environment that is both safe and healthy. Suitable steps should be taken to prevent accidents occurring in the normal course of work. Workers should receive suitable health and safety training as required and have access to clean toilet facilities and clean drinking water.

Discipline:

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is not acceptable. Disciplinary and grievance procedures shall be clearly documented and made available to all employees. All disciplinary measures of a serious nature shall be recorded.

Freedom of Association and Employee Representation:

All employees have the right to form and join organisations of their own choosing without prior authorisation.

Working Hours:

Working hours should not be excessive and shall comply with relevant national laws. Over time should be voluntary and of fair remuneration.

Remuneration:

Wages and benefits afforded to workers must meet national standards. Workers should be provided with clear written information on their pay and conditions. Deductions on wages should not be permitted as a disciplinary measure.

Equality of Treatment:

Suppliers will seek to eliminate discrimination in access to employment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, nationality, sexual orientation, disability or social origin and promote equality of opportunity and treatment to ensure adherence to national equality legislation.

Employment terms:

All workers must be provided with simple, written contracts which must detail the terms and conditions of their employment. Contracts should be clearly understandable to each worker. Work performed should be based on recognised employment law and practice.

Community impact:

Suppliers are expected to support the communities in which they operate through appropriate community initiatives.

It is understood that suppliers must comply with national and other applicable laws and regulations and where there is conflict between these and this policy then the highest standards linked with such laws and regulations shall be applied. Where there is no conflict we would expect that the provisions that give the greatest protection to workers should be applied.



STATEMENT OF INTENT

Environment

We seek to ensure that appropriate attention is paid to sustainable use of the world's resources and minimisation of environmental impact when Portakabin procure products and services.

In all cases suppliers must be able to demonstrate environmental policies and management systems sufficient to ensure continuous improvement in environmental performance. Therefore, suppliers should be able to demonstrate:

- Documented policies regarding environmental management
- The ability to monitor, review and report on environmental performance
- The degree to which suppliers' operations are covered by recognised environmental management systems or the organisations intentions towards such accreditation
- The awareness of potential environmental risks inherent in their production, service or sourcing activities
- The implementation of mechanisms and processes in place to mitigate or minimise potential environmental risks
- The degree to which products and services have been designed with environmental considerations in mind.

Net zero

Since 1961 Portakabin has been at the forefront of construction innovation, pioneering modular construction as a smarter way to build.

We've changed, we've adapted, and we've grown, but always with the aim of making a better future. Now as the world faces enormous climate challenges, we are ready to play our part in producing the sustainable circular economy that the planet needs. We will do this with integrity by making all possible reductions to our emissions across scope 1, 2 and 3.

Our ambitious targets are science based, aligned with the Science Based Target Initiative (SBTi) and with the goals of the Paris Agreement.

For the direct and indirect emissions from our internal activities, known as Scope 1 and 2, we are targeting Net Zero by 2030.

For the remaining emissions from our upstream and downstream value chain, known as Scope 3, we aim to be Net Zero before 2040.



Suppliers should seek to:

- + Minimise the use of energy, water and raw materials where practical
- + Maximise the use of recyclable and renewable materials including energy where possible
- + Make practical efforts to minimise waste and dispose of it in a safe, efficient, and environmentally responsible manner
- + Avoid contamination of the local environment and ensure that emissions, air, noise and odour pollution is, as a minimum, within nationally defined limits.

Legality

All procurement and contracting activity will fully respect and comply with:

- All applicable national laws and regulations
- All applicable European Union laws, directives and regulations
- The relevant laws, regulations and so on of other territories in which Portakabin operate, to which we supply, or from which we source
- International laws, treaties and agreements to which the UK and Republic of Ireland government is party (including, for example, any United Nations-approved trade sanctions).

Ethics

Portakabin has clear ethical standards and arrangements to promote and encourage compliance: similar standards are expected of our suppliers. Suppliers should be able to demonstrate the existence of processes and procedures to implement appropriate employee guidelines and codes of conduct.

As a minimum, suppliers should ensure that management systems and practices are in place to ensure the prevention of:

- Money Laundering
- Insider Trading
- Conflicts of Interest
- Fraud, Bribery and Corruption
- Payments or Gifts
- Personal data breaches
- Criminal Facilitation of Tax Evasion
- Breaches of the Competition Act 1998 (or non UK equivalent)
- Modern Slavery and Human Trafficking.

Compliance with the ethical standards of the Portakabin Supplier Code of Conduct will be assessed through a strict programme of regular review of all our suppliers.

OPERATING PRINCIPLES

Portakabin Operating Principles

These principles sit within our Procurement Policy to ensure an equitable procurement process which is compliant with all applicable laws and regulations. To implement these Operating Principles Portakabin will:

- Work collaboratively with suppliers to improve environmental, social, ethical and safety standards with the aim of realising continuous improvement in these areas for both our suppliers and ourselves
- Work together with suppliers to improve sustainability impacts, where appropriate
- Respect the confidentiality and security of sensitive information entrusted between ourselves and our suppliers in order to protect both parties
- Recognise the supplier's own standards where they are working to environmental, social, ethical and safety standards in line with those stipulated in the Portakabin Procurement Policy
- Not require suppliers to realise environmental, social, ethical and safety standards more onerous than our own
- Ensure that all relevant employees are aware of the Procurement Policy
- Ensure that Procurement Management is responsible for establishing the compliance of suppliers with the Supplier Code of Conduct
- Seek to exert commercial influence where we are confident that improvements can be made in environmental, social, ethical or safety standards performance of suppliers
- Ensure that suppliers' employees and sub-contractors working on Portakabin premises or sites are treated with the same respect for diversity and workplace safety as our own employees
- Base our supplier selection on objective and transparent criteria that include the consideration of environmental, social and ethical performance
- Cease trading with suppliers showing persistent disregard for important elements of environmental, social and ethical performance
- Act as an advocate for responsible supply chain practices within our industry sector
- Use a risk based approach to ensure we focus on those areas where the risk is greatest and maximum improvement can be achieved.

Supplier Adherence to Operating Principles

Portakabin expect that all our suppliers adhere to the Operating Principles set out below:

- All suppliers are expected to have management systems in place for delivering compliance with the Operating Principles in their own operations and across their supply chains
- All suppliers should comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions
- All tier three sub-contractors engaged to work on any Portakabin site must strictly adhere to Portakabin Health and Safety and Quality standards
- All suppliers should demonstrate continuous improvement in their approach to sustainable and responsible procurement
- All suppliers are expected to communicate their expectations for compliance on all the issues raised within the Operating Principles to all relevant employees and suppliers
- All suppliers should provide evidence to enable assessment of the implementation of the Operating Principles by Portakabin those acting on their behalf and other relevant independent third parties
- All sub-contractors wishing to engage further/supplementary tier three sub-contractor resources to work on behalf of Portakabin should inform Portakabin in advance of the commencement of any contract.





FINANCE

Invoices

Suppliers to Portakabin should submit all invoices and credit notes via email to:

- pkYorkinvoices@portakabin.com for Portakabin Limited
- pkscotlandinvoices@portakabin.com for Portakabin (Scotland)
- pkSiteaccom@portakabin.com for Portakabin (Site Accommodation)
- APinvoices@portakabin.com for Portakabin (Ireland)

Please confirm the correct email address with your point of contact within Portakabin if you are unsure and include the following information as a minimum on each invoice;

- Portakabin Order number
- Description of goods or service (including quantity, unit price and discounts)
- Gross, Net and Vat amount
- Supplier VAT registration number
- UTR number and Company Registration number for all CIS suppliers
- Delivery note number.

All suppliers must ensure submitted invoices are dated accurately in order to facilitate prompt and efficient processing.

Purchase Orders

An Official Portakabin Purchase Order referencing Portakabin Terms and Conditions of Purchase, will be raised for the purchase of all goods and services. It is the duty of the supplier to ensure they receive an official Portakabin purchase order number prior to the provision of any goods and services. Portakabin reserves the right to refuse to pay invoices in respect of commitments for which no official purchase order has been placed.

Payment

Payments (in line with agreed payment terms) to UK suppliers will be made weekly by BACS. Payments to non UK suppliers will be made weekly via Bank Transfer.

Payment Query Process

Specific invoice payment queries should be directed to the Purchase Order originator. CIS information requests should be sent direct to:

**Purchase Ledger Department,
Portakabin Limited, New Lane, Huntington, York YO32 9PT.**



PORTAKABIN POLICIES

Here you will find an overview of the policies which govern the aspects of the way we do business:

Anti-Bribery and Corruption

Portakabin is committed to and expects the highest standard of behaviour and conduct from its officers, employees, agents, partners, contractors, suppliers and all other third parties acting or purporting to act on our behalf or on behalf of any of our businesses or subsidiaries in all countries in which we operate.

Portakabin policy is to conduct business in an honest way, without the use of corrupt practices or acts of bribery to obtain an unfair advantage and this applies to all parties listed above. The giving or receiving of gifts or corrupt practices are contrary to our values and are not part of the way we do business.

Data Protection

During the course of our activities we will collect, store and process personal data about our customers, suppliers and other individuals with whom we communicate. We recognise that the fair, transparent and lawful treatment of this data will maintain confidence in our organisation.

Equality and Diversity

Portakabin respects that everyone is different and actively promotes a working environment which is free from discrimination and one which is based on equality and diversity. We oppose all forms of unlawful and unfair discrimination. We will not discriminate on grounds of age, disability, gender (including transgender), marital status (including civil partnership), pregnancy and maternity, race (including colour, nationality, ethnic or national origin), caste, religion or beliefs, or sexual orientation. We will also not discriminate because of working patterns or trade union membership nor will we tolerate harassment or bullying on these or any other grounds.

This commitment is relevant to all we do, how we manage ourselves and how we deliver our services. It applies to all of our employees as well as suppliers, subcontractors, temporary agency workers and clients.

Fraud

Portakabin is committed to high legal, ethical and moral standards. All employees, suppliers and customers are expected to share this commitment. As a result, we are committed to

preventing, detecting and reporting fraud, and in co-operating with other organisations to reduce the opportunities for fraud.

Social Media

Portakabin encourages employees, suppliers and customers to make reasonable and appropriate use of social media channels. This includes supporting activity of the business's corporate channels. However, there is a reasonable expectation that all employees together with contractors and sub-contractors whilst undertaking work on behalf of Portakabin (i.e. employed by Portakabin), will operate with caution and courtesy in the public domain to conserve the reputation of Portakabin and its employees. The Portakabin brand, including the logo, must not be used to promote third-party products or services without written consent. Wherever the trademark is used, it must be used and rendered correctly.

Gifts and Hospitality

In accordance with our Business Ethics Principles, whilst we recognise that our suppliers or customers may offer gifts in good

faith; as a principle and in line with our Gift and Hospitality Policy we discourage the acceptance of any such items.

Dignity at Work

Portakabin is committed to maintaining a working environment which is free from bullying, harassment and discrimination and which protects the dignity of all employees.

Our approach to bullying and harassment is one of zero tolerance. Harassment at work is wholly unacceptable, but it is also unlawful under the Equality Act 2010 and may also be treated as a criminal offence. We will not tolerate harassment or bullying of job applicants, employees, contractors, agency or temporary workers, ex-employees or customers/clients.

Modern Slavery and Human Trafficking Policy

Portakabin is committed to ensuring that there is no modern slavery or human trafficking within our business or any third party that we engage with and this policy requires suppliers to observe and uphold our position on preventing modern slavery and human trafficking.



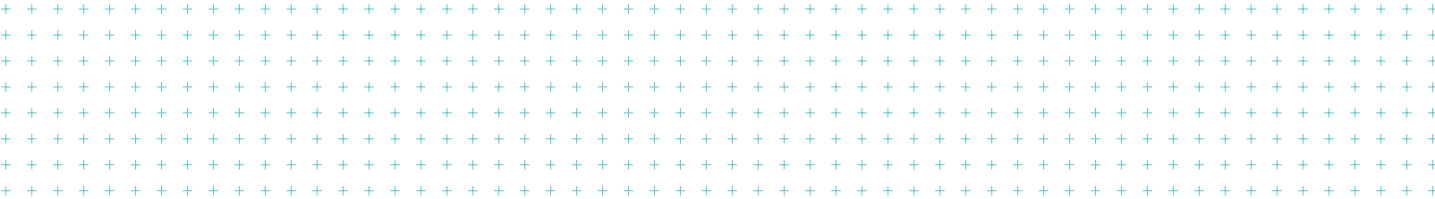


DECLARATION

To be completed by a Director/Owner
of the Company

**I hereby confirm that I have read and understand
the Portakabin Supplier Code of Conduct**

Company name	
Name	
Job title	
Telephone	
Email	
Date	
Signature	



USEFUL INFORMATION

Head Office

01904 611655

Procurement

procurement@portakabin.com

Portakabin reserves the right to change, modify, eliminate, discontinue or interpret any of the policies and procedures included here at any time. The content is not a substitute for official documents and, in case of conflict between descriptions in this handbook and official documents, the language of the official documents will prevail.

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Registered company number 685303.

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