



# ISO 9001:2015 Clause 8.4 Supplier Code of Conduct

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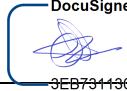
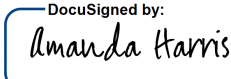
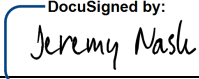


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## Approvals

The signatures below certify that this procedure has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	Chris Hunt		Group Quality Manager	28/03/2024
Reviewed and approved	Amanda Harris		Director, Support Operations	01-Apr-2024
Approved by	Jeremy Nash		CEO	01-Apr-2024

## Amendment Record

This procedure reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date
	New Document	1	05/02/2021
7	Removal of Hemel Hempstead reference	2	02/03/2022
9, 10, 11, 12, 13	Amendment to documented references (2.2), 3.3 Occupational Health & Safety, Change to ISO Logos, 6 Sustainability 7.1, 7.2 Data Protection, 7.3 Confidentiality and Provision of Information	3	31/01/2023
12	7.1 3 bullet added to meet MoD SAQ requirements	4	16/02/2023
9, 11	Change of ISO 27001 references, Update ISO Logos	5	28/03/2024



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# 1. Introduction

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## 1. Introduction & Purpose

For over 30 years, Centerprise International Group has been acknowledged as one of the largest and most respected IT providers in the UK. A real British success story, CI has developed a steadfast reputation for delivering large scale IT projects within the Corporate, Education, Government and Reseller sectors. Initial success grew in manufacturing high quality customised desktop PCs, notebooks, and servers in Basingstoke. Over the last decade in response to customer demands, CI has diversified and enhanced their services to include Total Service Provision, System Integration, and Full Managed Services, and has become a significant reseller of many Tier 1 branded products.

The main processes are:

- IT Sales
- IT Service Management
- IT Production
- Disaster Recovery and Data Continuity Solutions (both onsite and offsite)



In an ever-changing and highly digital world, there is a need for IT systems that are fit for purpose and produce the desired effect. Centerprise International Ltd (CIL) provides unique solutions to those whose needs require products of high quality for use in their IT Infrastructure.

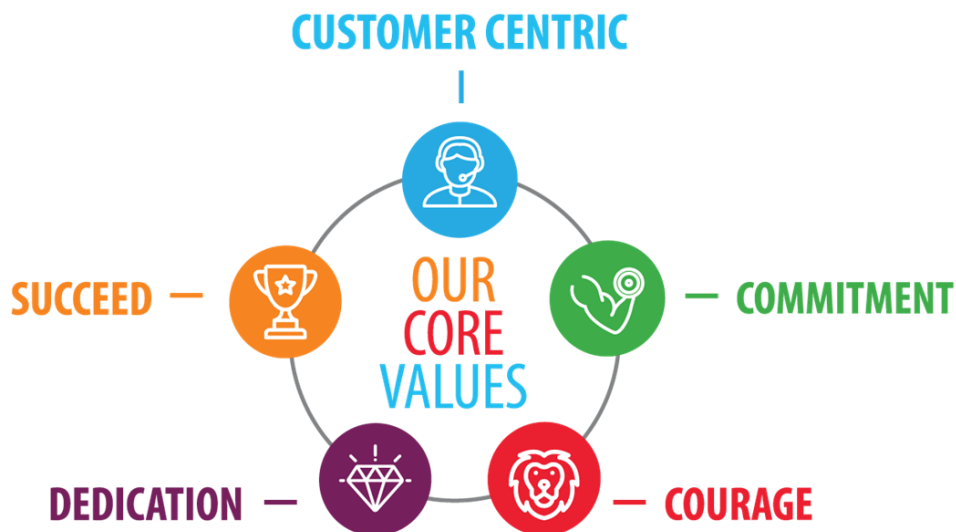
CIL strives to conduct business responsibly and keep in compliance with all of our statutory and legal obligations.

We recognise that our Suppliers play an important part in meeting our sustainability supply chain obligations. In our vision to become; the preferred choice for IT solutions, we therefore need all our Supplier's to fully commit to support us on this sustainability journey through the care they invest in the parts, components, and services they deliver.

We encourage our suppliers and partners to establish their own codes of conduct based on similar standards and to flow down these standards to all persons and entities supplying goods or services to CIL.

This code applies to all stakeholders providing a product or service to the CIL Group of Companies. If a supplier fails to meet our expectations as set out in this Supplier Code of Conduct, CIL's general approach is to encourage improvement. Critical deviations or repeated unwillingness to make improvement, however, may jeopardise the supplier's relationship with CIL.

At CIL, we believe in healthy business relations with our customers, suppliers, partners, colleagues, and other stakeholders. At all levels, people shall be treated with a service minded approach and utmost respect. To reinforce this approach, the CIL Group of Companies has adopted a set of core values:



Adding to the core values, CIL has through this Supplier Code of Conduct have also adopted the principles described in the ISO Standards that CIL has achieved.



## 2. General Requirements

2.1 CIL develops, designs, and sell products and services to a variety of industries and business segments. Therefore, CIL has unique supplier quality requirements specific to these industries and business sectors. Processes and tools described in the CIL Supplier agreement represent the core expectations and requirements of our business partners.

CIL Supplier agreement details requirements for CIL 's Key Suppliers on the supply requirements for manufacturing to drawings or delivering a categorised important product, to CIL in addition to this Suppliers Code of Conduct.

### 2.2 References

The following documents support this Code of Conduct:

#### Supporting documentation:

Ref	Title & Description	
QM001	Quality Manual	(ISO 9001:2015)
QM001.4	Group Equality and Diversity Policy	(ISO 9001:2015)
QM001.5	CI Group Ethical Trading Policy	(ISO 9001:2015)
QM001.6	CI Group Declaration of Conformity to EU Council Directives	(ISO 9001:2015)
QM001.7	CI ESG Policy	(ISO 9001:2015)
QM001.8	CI Group Anti-Slavery and Human Trafficking Policy	(ISO 9001:2015)
QM001.10	CI Group Product Safety Policy	(ISO 9001:2015)
QP009	Design and Development Procedure	(ISO 9001:2015)
QP010	Purchasing Procedure	(ISO 9001:2015)
QP013	Identification and Traceability Procedure	(ISO 9001:2015)
QP015	Preservation of Product Procedure	(ISO 9001:2015)
QP019	Inspection and Testing Procedure	(ISO 9001:2015)
QP020	Control of Non-Conformances	(ISO 9001:2015)
QM002	Customer Complaints	(ISO 10002:2018)
QM003.7	Green ICT Policy	(ISO 14001:2015)
QM003.13	WEEE policy and Directive	(ISO 14001:2015)
QM003.15	CI Group RoHS and REACH Statement	(ISO 14001:2015)
QM005.8	Information Security Policy for Contractors, Consultants and Suppliers	(ISO 27001:2022)
QM005.11	Corporate Hospitality and Bribery Act Policy	(ISO 27001:2022)
QM006.6	CI Group H&S COSHH Policy	(ISO 45001:2018)
QM006.8	CI Group H&S Contractor Policy	(ISO 45001:2018)
QM007.4	Business Continuity Plan	(ISO 22301:2019)

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## 3. Social Sustainability

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### 3.1 Free will

Products and services bought by CIL, shall be provided by people who are working by their own free will.

### 3.2 Child Labour

CIL does not accept child labour. Suppliers and partners shall comply with International Conventions as well as national legislation in the country where the product is manufactured, or the service is performed.

### 3.3 Occupational Health & Safety

At CIL, we are committed to continually improving our health and safety performance and to ensuring that our employees and those who may be affected by our activities and operations do not have their health or safety influenced adversely. We seek to work with Suppliers and Partners who have a similarly robust and dynamic approach.

Working hours and minimum wages shall comply with national legislation in the country where the products are manufactured, or the service is performed. CIL strives for its entire supply chain to work in compliance with national occupational health & safety legislation to promote safe & healthy workplaces.

### 3.4 Non-discrimination and Equal Employment

Employees shall be treated with respect and in accordance with the seven grounds of discrimination in the Discrimination Act and any other characteristics protected by law. Everyone is entitled to a working climate where no one should have to be subjected to bullying, discrimination, or any other form of harassment.

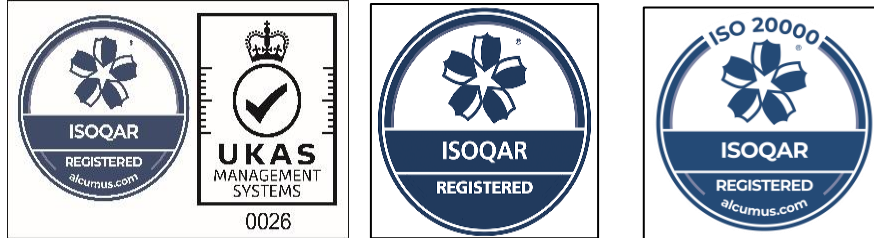
People who manufacture products or perform services for CIL will be respected in their trades and shall not be discriminated in any way that conflicts with above.

### 3.5 Corruption and Bribes

CIL promotes healthy long-term business ethics with all its stakeholders and counteracts any form of corruption. CIL is strongly committed to comply with applicable antitrust laws that prohibits illegal agreements between competitors that undermine competition, this includes bribes, influence payments, kickbacks or any other unlawful payments to any government or similar agency officials.

When representing CIL, local laws and regulations apply for representation, gifts as well as general expenses made in a business context.

## 4. Quality



Certificate No 6786

ISO 9001 / ISO 14001

ISO 22301 / ISO 27001

ISO 45001

Certificate No 6786

BS 15713 / ISO 10002

ISO 27017 / ISO 27018

Certificate No 6786

ISO 20000-1

The Supplier shall meet all CIL requirements, to deliver flawless and working products on time, through their controlled processes. This is to be achieved by:

- Being able to demonstrate that the Supplier meets and works in accordance with the requirements of ISO 9001:2015 or equivalent.
- When goods are delivered, a dimension control form shall be supplied for the mechanical items and a certificate of conformity for the electrical parts. This certificate confirms that the Supplier has controlled/measured/inspected the goods and that it has met the requirements of the relevant drawing/specifications, including this document.
- The supplier should ensure adequate training by setting up a training program for all personnel.
- The supplier should have an adequate system in place to control, investigate and correct customer complaints.

## 5. Environment

The Supplier shall meet all CIL requirements, to use Environmentally friendly manufacturing methods, wherever possible. This is to be achieved by:

- Being able to demonstrate that the Supplier meets and works in accordance with the requirements of ISO 14001:2015 or equivalent.
- Define and implement appropriate and effective processes to ensure compliance to applicable environmental regulations such as RoHS, REACH, and Conflict Minerals and shall regularly assess the organisations compliance with these, as well as the conformance of its suppliers.

- All product supplied, and work performed under this agreement, unless specifically agreed in writing, shall comply with all applicable laws governing the environmental compliance of the products or the manufacturing of them.
- The supplier should make an active effort to inflict as little damage on the environment, as possible by setting up environmental targets to comply with local regulations.

## 6. Environmental Sustainability

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Sustainability is central to CIL's business, its purpose, and its future vision. We want to play a part in delivering net zero and to support our local communities and environments. In order for us to hit our goals, the sustainability of our supply chain is crucial and that is why we are committed to sustainable procurement.

CIL is committed to continually developing our approach to sustainability to ensure we are making a positive contribution to society long into the future. For us to achieve our goals, the performance of our supply chain is crucial. We expect our Supplier Partners to minimise detrimental impacts on the environment and society, and to contribute positively towards good governance and environmental and social protection.

We expect our Supplier Partners to consider their impacts and undertake specific actions such as maximising energy efficiency, minimising waste and reducing their carbon footprint.

## 7. Security and Cyber Security

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7.1 The Supplier shall meet all CIL requirements, to handle information and data in a secure manor, through their controlled processes. This is to be achieved by:

- Being able to demonstrate that the Supplier meets and works in accordance with good and relevant Cyber security practices.
- Define and implement appropriate and effective processes to ensure compliance to applicable regulations regarding risk, security and cyber security and shall regularly assess the organisations compliance with these, as well as the conformance of its suppliers.
- Ensure all relevant cyber standards required through contracts or regulations are met on a contract basis.

### 7.2 Data Protection

To the extent sensitive or personal data is shared in the course of business, our Suppliers and Partners will comply with all requirements of applicable data protection laws.

### 7.3 Confidentiality and provision of information

Our Supplier Partners confirm that false information will not be given in the course of commercial negotiations. The confidentiality of information exchanged in the course of business must be respected and never shared outside of the Supplier Partner's business, used for illegal purposes or for individual gain.

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We expect our Supplier Partners to conduct themselves professionally and not to bring Centerprise Internationals name into disrepute.

## 8. Compliance Obligations

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Suppliers must operate in compliance with mandatory requirements, such as applicable laws and regulations, applicable organisational and industry standards, contractual requirements, and any codes of practice. The supplier should have documented processes for passing down applicable requirements through their supply chain.

CIL reserve the right to conduct audits and inspections with respect to the manufacture, sale and delivery of products, environmental capability, and all other supplier activities stated in this document, or other requirements agreed upon at the time of order placement.

CIL assumes that the supplier will be available to be audited if required, to fulfil any contractual agreement. The supplier will be notified, by CIL, in due time before any audit activity is planned.

### 8.1 Export control

Suppliers and partners are encouraged to familiarise themselves with the import and export regulations of their country to ensure compliance with their specific regulations and to ensure timely delivery of CIL products.

### 8.2 Conflict Minerals

With respect to the UN Resolutions adopted by the UK and any other applicable legislation (e.g. Dodd-Frank Act), suppliers and partners shall carry out due diligence and not knowingly use components containing metals produced from conflict minerals, in the manufacture of its products or components.

These include minerals obtained in areas such as the DRC:

- Cassiterite (Used for plating and soldering on electronic circuits)
- Columbite-Tantalite (Electrical components in computers, Mobile phones etc.)
- Gold (Electronics)
- Wolframite (Metal wires, electrodes, and contacts)

### 8.3 Counterfeit parts avoidance

The Supplier shall strive to prevent the potential of counterfeit components from entering into the CIL supply chain. This includes implementing processes for risk mitigation, detection, disposition, and reporting of counterfeit parts.

### 8.4 Non-conformances

The main purpose of Non-conformances is to learn from our mistakes, solve issues before they potentially cause harm or risk, identify root causes and to continuously improve our methods and processes.

To succeed, it is of outmost importance that anyone who identifies an issue, or even the risk of an issue, shall feel free to raise it through their designated CIL contact.



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## 9. Documentation & Records

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The location and retention period for records relating to Supplier will be managed in accordance with ISO 9001:2015 7.5.2/7.5.3.