



## Supplier Code of Conduct

PM Group is an international project delivery company providing architecture and engineering design, project management, construction management and consultancy services across a variety of sectors.



**Our Mission:** As an employee-owned company we are inclusive, committed and driven. We innovate to deliver.

Corporate integrity, responsible sourcing and the safety and wellbeing of workers in the countries where we do business are of paramount importance to PM Group. These core principles are reflected in this Supplier Code of Conduct which establishes the minimum standards that must be met by any entity that supplies products, works or services to PM Group

Suppliers are expected to provide goods & services that meet or exceed agreed or legally required standards for consumer health and safety, including those relating to health warnings and safety information.

Suppliers are expected to adhere to the principles of this policy and are expected to establish and maintain governance and control systems which are appropriate to the nature and scale of their activities. Suppliers shall ensure that their established systems for managing their own supply chain reflect the principles of this policy and that these principles are complied with by their supply chain. Compliance with the principles set out in this policy is a condition precedent to inclusion on the PM Group approved supplier list. We reserve the right to exclude suppliers whose practices, policies or procedures do not conform to the principles within this policy, and or additional requirements outlined by our clients. PM Group will make clear to any company that it chooses to exclude the reasons for this

**Signed:**

**Date:**

November 23

Dave Murphy  
CEO, PM Group

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## OUR VISION

### A HIGHLY VALUED AND CREATIVE DELIVERY PARTNER, BUILDING A MORE SUSTAINABLE WORLD WITH OUR CLIENTS.

## 1 PM Group Supplier Code of Conduct

Corporate integrity, responsible sourcing and the safety and wellbeing of workers in the countries where we do business are of paramount importance to PM Group. These core principles are reflected in this Supplier Code of Conduct (“**Code**”) which establishes the minimum standards that must be met by any entity that supplies products, works or services to PM Group.

### 1.1 Scope and Definitions

PM Group’s procurement activities cover a wide range of products and services, from large global technical engineering equipment contracts and services to single transaction purchases of, for instance, catering and office supplies. They involve a wide variety of suppliers, including multinational companies, as well as small local businesses and individuals.

In this Code:

“**PM Group**” means the PM Group company with which the Supplier has contracted with.

“**Supplier**” means a company, partnership or individual that provides goods, works or services to PM Group.

“**Supply**” means the supply of goods, works or services to PM Group by the Supplier.

“**Worker**” means any individual whom the Supplier employs, hires or engages, or otherwise uses to conduct its business.

“**Representative**” means the Supplier’s suppliers, vendors, agents and subcontractors and/or sub-consultants who are involved in PM Group’s supply chain.

### 1.2 Updating this Code

PM Group has the right to review and modify this Code from time to time. Suppliers are responsible to follow the latest revision on this Code which is available on the PM Group web site at <https://www.pmgrouppl.com/policies/>

### 1.3 Training

The Supplier shall implement a system of training for its appropriate workers to ensure that they are aware of the requirements of this Code. The Supplier shall keep a record of all training offered and completed by its workers and shall make a copy of such record available to PM Group on request.

### 1.4 Certifying Compliance and Audit

The Supplier shall if requested provide written confirmation to PM Group that:

- (a) it has appropriate systems in place to monitor its compliance with this Code; and
- (b) it is able to comply with this Code for the duration of its relationship with PM Group.

The Supplier shall provide any additional third-party or self-certifications that are reasonably required to demonstrate compliance with all applicable laws and frameworks within ten days of a written request from PM Group.

In addition to the written confirmation referred to above, PM Group may conduct audits and inspections to verify the Supplier's compliance with this Code. PM Group has no obligation to conduct such audits or inspections.

## 1.5 Supplier's Commitment

The Supplier agrees that:

- It will comply with the requirements in this Code.
- It has appropriate systems in place to ensure compliance and to demonstrate such compliance.
- Any breach of this Code will allow PM Group to terminate its relationship with the Supplier.

## 2 Compliance with Laws and Regulations and Priority of Standards

In carrying out its agreement(s) with PM Group the Supplier shall, in addition to complying with the standards set out in this Code, comply with all applicable laws, codes and regulations relating to the supply of the goods and services.

### 2.1 Data Protection and Information Security

The Supplier shall comply with all data protection laws and requirements when processing any personal data on PM Group's behalf.

The Supplier shall have in place appropriate measures to:

- (a) protect the integrity and confidentiality of information (including information belonging to or supplied by PM Group held on its systems (which include physical and online or electronic systems); and
- (b) ensure that there is no unauthorised access of the information by third parties, including its Representatives.

## 3 Health, Safety and Wellbeing

### 3.1 Product or service safety

Suppliers are expected to provide goods & services that meet or exceed agreed or legally required standards for consumer health and safety, including those relating to health warnings and safety information.

### 3.2 Safe and healthy working environments

PM Group is committed to providing employees and all workers on PM Group controlled sites with a safe, healthy working environment. Suppliers are also expected to provide a safe, hygienic and healthy working environment for their employees, and provide adequate training to their workers on these matters.

## 4 Business Conduct & Ethics

### 4.1 Laws and regulations

All suppliers must comply with applicable laws and regulations. They are expected to honour applicable industry standards, international treaties, and internationally-accepted standards and agreements relevant to their activities.

Suppliers will conduct their business with PM Group and other customers in a responsible manner, and abide by minimum standards of business integrity as set out in this policy, and all applicable laws and regulations. These include, but are not limited to, standards on bribery and corruption, money laundering competition, fair payment, fair representation, conflicts of interest, and product safety.

## **4.2 Bribery and Corruption**

Suppliers are strictly forbidden from offering any bribe (consisting of money or anything of value) to public officials, irrespective of their worth, its results, local custom, the tolerance of such payments by local authorities, or the alleged necessity of the payment in order to obtain or retain business or any other advantage. Suppliers are forbidden from seeking to obtain new business or any other improper commercial advantage by allowing undue payments to be made. All country specific anti-corruption and anti-bribery laws (e.g. Bribery Act 2010 (UK) and Foreign Corrupt Practices Act (USA) ) as amended from time to time, must be complied with.

## **4.3 Money laundering**

Suppliers shall not participate in any activity aimed at laundering money. In addition they must not provide assistance to any person or organisation trying to benefit from proceeds of a criminal act or illegal activity or controlling funds invested for the benefit of any illegal or terrorist organization.

For the purposes of this document money laundering is defined as; the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses

## **4.4 Competition**

Suppliers shall refrain from directly or indirectly engaging in any discussion or activity that constitutes anti- competitive behaviour or in any other way violates anti-trust provisions.

## **4.5 Conflicts of interest**

Suppliers should avoid any actual or apparent conflict of interest. Suppliers are required to communicate potential conflicts of interest to contact details given below.

# **5 Human Rights & Social Impact**

## **5.1 Forced or compulsory labour**

Suppliers should not use forced or compulsory labour practices including any form of human trafficking, and must take steps to ensure they do not contribute to the use of forced, compulsory labour or human trafficking, in compliance with the core standards of the International Labour Organisation and any local laws or regulations (e.g. Modern Slavery Act 2015 (UK)).

## **5.2 Child labour**

Suppliers should not use child labour, and must take steps to ensure they do not contribute to the use of child labour, in compliance with the core standards of the International Labour Organisation and any local laws or regulations (e.g. Modern Slavery Act 2015 (UK)).

## **5.3 Working hours**

Suppliers are expected to ensure that working hours comply with national legislation and applicable international guidelines.

## 5.4 Human rights

Suppliers should uphold internationally recognized human rights, and are expected to be guided by PM Group policies and avoid complicity in the abuse or violation of internationally-proclaimed human rights standards.

## 5.5 Non-discrimination

Suppliers should refrain from any discriminatory practices either with regard to recruitment, promotion, pay or bonuses, or in their general conduct in the workplace. Company policies, procedures and practices should be applied fairly, should avoid negative impact on any specific group of employees or potential employees and, wherever possible, promote a work environment free from discrimination, whether on the grounds of gender, ethnic origin & race, disability, religion or beliefs, sexual orientation, age or civil / marital status, condition of employment etc.

## 5.6 Grievance procedures

Suppliers are expected to enable employees to communicate openly with management regarding working conditions without fear of reprisals, intimidation or harassment. Suppliers should also have grievance mechanisms in place to allow complaints from other stakeholders to be heard, assessed, and, if necessary, remedied as promptly as possible.

## 5.7 Contract workers

With respect to contracted workers, suppliers are expected to ascertain that third parties engaging these workers are reputable and legitimate, and will regularly monitor the performance of these third parties against the standards outlined in PM Group policies.

## 5.8 Local Production

Sourcing goods and services from local suppliers implies potential economic benefits in the communities where we and our clients live and work. This inward investment can help ensure the on-going economic sustainability of the our local area through job creation. Where technically, economically and environmentally possible, without prejudice we will seek to promote and avail of local procurement opportunities.

## 6 Environment

In line with our [Environment & Sustainability Policy](#), PM Group aims to continually improve our impact on the environment through operational controls including sustainable procurement. This includes ensuring the materials, goods and services we purchase for our office operations and our business activities on behalf of our clients are to the appropriate sustainable standards, as reasonably practicable.

We expect the same standards from our Supply Chain. Suppliers should recognize and manage their environmental impact.

### 6.1 Product or service development

Suppliers are expected to take environmental concerns into consideration during each phase of production or service development and delivery. This includes developing products with no undue environmental impacts, that are safe in their intended use, that are efficient in consumption, and can be reused, recycled or disposed of safely.

## 6.2 Resource use and waste

Suppliers are expected to monitor, control and reduce the use of resources that are material to their business, including energy, water and other commodities.

## 6.3 Responsible management of environmental impacts

Suppliers are expected to avoid, or where unavoidable to minimise or mitigate, air emissions and water discharges, and to safely treat, store, transport, use and discharge or dispose of solid waste and by-products.

## 6.4 Contingency plans

Suppliers are expected to maintain contingency plans for preventing, mitigating and controlling serious environmental and health damage arising from their operations.

## 6.5 Conflict Minerals

Wherever applicable our Suppliers must comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflicted and High Risk Areas.

## 6.6 Whole Life Costing

Cost efficiency of goods and services is a key consideration of any procurement process. The whole life cost and total cost of ownership must be considered, where relevant, to ensure true cost efficiency is obtained.

## 7 Suppliers' Responsibility to this Code of Conduct

Suppliers are expected to adhere to the principles of this policy and are expected to establish and maintain governance and control systems which are appropriate to the nature and scale of their activities.

Suppliers shall ensure that their established systems for managing their own supply chain reflect the principles of this policy and that these principles are complied with by their supply chain.

Compliance with the principles set out in this policy is a condition precedent to inclusion on the PM Group approved supplier list. We reserve the right to exclude suppliers whose practices, policies or procedures do not conform to the principles within this policy, and or additional requirements outlined by our clients. PM Group will make clear to any company that it chooses to exclude the reasons for this action.

Should you have any serious concern that may not be compliant with Supplier Code of Conduct or seek guidance on specific situation, please contact us on [integrity@pmgroup-global.com](mailto:integrity@pmgroup-global.com)

PM Group reserves the right to amend this policy in line with best practice in this area and its own experience with sustainable procurement. PM Group will communicate to key suppliers and other stakeholders any material changes as and when they occur.

## 8 Referred PM Group Policies

[PM Group Anti-Bribery & Anti-Corruption Policy](#)

[PM Group Diversity and Inclusion Policy](#)

[PM Group Environment and Sustainability Policy](#)

[PM Group Health & Safety Policy](#)

[PM Group Modern Slavery and Human Trafficking Policy](#)

[PM Group Quality Policy](#)



[PM Group Sustainable Procurement Policy](#)  
[PM Group Gifts and Entertainment](#)