



Windle Trust
International

SUPPLIERS CODE OF CONDUCT

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1.0 Introduction

Windle Trust International's work is the legacy of Dr Hugh Windle Pilkington, who dedicated his life to helping people in East Africa, and refugees in particular and others affected by conflict, to secure access to education. He drew his inspiration primarily from his strong Christian faith, reinforced by academic research at Nairobi University which brought him into touch with both Kenyans and Ethiopian refugees. Dr. Hugh Windle Pilkington had a passionate belief in the value of education and worked tirelessly to provide opportunities to refugees and others excluded from schooling. In 1977 he established Windle and after his sudden death in a road accident in 1986 the Hugh Pilkington Charitable Trust was created to take forward his work. Windle Trust International (WTI) was created as the operational arm of HPCT in 2002 and is responsible for managing programmes in UK, Sudan and South Sudan. Windle Trust International works helps refugees and people affected by conflict to access quality and inclusive education. We are an international NGO with over forty years of experience, and our independent members are based in and operate across East Africa including Kenya, Uganda, Somalia with registered offices in the US and Canada.

As the Windle family of Trusts, we together empower refugees and people affected by conflict and marginalisation to achieve their academic potential, and contribute to sustainable development, by providing access to quality education and training. From managing primary schools to providing higher education scholarships to postgraduate level and offering vocational training, we support our beneficiaries to succeed at every educational level.

Windle Trust International (WTI) is committed to the highest standards of social and environmental responsibility and ethical conduct. Our suppliers are expected to operate in accordance with the principles in this Supplier Code of Conduct and in full compliance with all applicable laws and regulations at international and national levels. In addition all our suppliers are required to sign safeguarding and conflict of interest policies.

2.0 The suppliers Code of Conduct

Windle Trust International (WTI) is committed to Sustainable Development throughout the entire value chain of our operations. With this we expect our suppliers to agree and comply with our Suppliers Code of Conduct. As Supplier, WTI expects them to ensure that the practices and principles outlined in our Suppliers Code of Conduct are followed throughout their supply chain.

2.1 Scope of this code of conduct:

This Suppliers Code of Conduct specifies the minimum standards expected of all suppliers WTI within their sphere of influence, WTI also encourages suppliers to apply these minimum standards to their

subcontractors and sub-suppliers. Furthermore, we also encourage suppliers to strive to live up to both international, national and industry best practices.

2.2 Continuous Improvement:

Windle Trust international expects compliance with the Code of Conduct for Suppliers, but recognises that embracing these fundamental principles is a dynamic rather than static process and encourages suppliers to support our mission through a never ending search to improve working conditions. In order to demonstrate and communicate work and improvement toward the principles, Windle Trust international employees and its suppliers are expected to refer to the Suppliers code of conduct in every work aspect and identify areas necessary for improvement.

2.3 Management, Monitoring and Evaluation:

Windle Trust international through its supplier relationship management system is to ensure that the Suppliers Code of Conduct is well known and understood by its employees responsible in the supplier relation management and its suppliers. Windle Trust international or a third party assigned by Windle Trust international may review or conduct onsite audits to assess the supplier's status and progress towards the principles.

This code of conduct is based on the following internationally recognised standards and Windle encourages its suppliers to be familiar with them:

- The United Nations' Global Compact (www.unglobalcompact.org)
- The Universal Declaration of Human Rights (www.un.org/en/universal-declaration-human-rights/)
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work (www.ilo.org/declaration/info/publications/WCMS)
- The United Nations Convention Against Corruption (www.unodc.org/unodc/en/corruption/)

3.0 The principles of this Code of Conduct

This Code specifies the minimum standards of behaviour that WTI expects of our approved suppliers. The purpose of the Code is to formally communicate WTI's requirements and expectations to the supply chain. Suppliers are required to adhere to and comply with the principles set out in this document.

3.1 Respect Laws, Rules and Regulations

Windle Trust International expects suppliers to always comply with relevant regulatory requirements at international, national and local level in all of their business and operations.

3.2 Uphold Human Rights

Windle Trust International passionately upholds fundamental human rights as set out in the UN Universal Declaration of Human Rights. We require suppliers to treat their employees and

stakeholders with fairness, respect, and dignity and comply with all relevant legislation, regulations and directives.

3.3 Labour

We expect our suppliers to:

- a) **Forced labour:** Protect their employees from any form of forced or compulsory labour
- b) **Freedom of Association:** WTI suppliers should recognise that their employees have the right and are free to establish worker associations to defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively
- c) **Child labour:** Prohibit any form of child labour in their business operations consistent with the International Labour Organisation's (ILO) core labour standards and the UN Global Compact principles. According to South Sudan Labour Act a **child** is any one below 18 years of age and are not eligible for any employment that may affect their health and moral values.
- d) **Discrimination:** Protect employees from discriminatory practices based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination.
- e) **Working hours:** Comply with all applicable working hour requirements as established in law 8 hours per day and any over time assignment must be calculated compensated.
- f) **Working conditions:** Provide employees with a safe working environment and comply with all applicable laws and regulations regarding working conditions.
- g) **Compliance to legal laws:** Comply with all other applicable labour laws of the country, legal laws always take precedents of the applicable laws.

3.4 Ensure Health & Safety laws are upheld

Windle Trust International expects our suppliers to follow all relevant laws and regulations in the country of operation to ensure a safe and healthy workplace. Suppliers should strive to implement recognised management systems and guidelines such as the *ILO Guidelines on Occupational Safety and Health*.

3.5 Act with environmental responsibility

WTI recognises that the effects of climate change are a major concern for the communities we support and are likely to have an increasingly negative impact on refugees, communities affected by conflict and those who have been marginalised. We expect our suppliers to minimise their environmental impact in their business and operations, including:

- a) Complying with applicable environmental laws, regulations and standards
- b) Demonstrating a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide.
- c) Having in place an effective environmental policy, statement or programme to mitigate these risks and impacts.
- d) Demonstrating commitment to reducing their negative environmental impact.

Encouraging the development and use of environmentally friendly technologies and practices.

3.6 Act with integrity

WTI will ensure all suppliers sign our safeguarding, conflict of interest, code of conduct and Fraud and Corruption policies in addition to this supplier code of conduct. WTI will do background checks on all suppliers and only enter into and sustain relationships with suppliers who known to act with a high degree of integrity. This includes demonstrating:

- a) **Integrity and honesty**, constantly striving to uphold the highest standards of ethical practice.
- b) **Adherence to laws and regulations**.
- c) **Declaring conflict of interests**. Suppliers should not engage in any undertakings that may constitute an actual or apparent conflict of interest with Windle. Suppliers should disclose any situation that may appear to be a conflict of interest. This can include disclosing if a Windle representative has an interest or economic tie with the supplier.
- d) **Not offering gifts or hospitality**. Suppliers should not offer Windle employees gifts or any other kind of personal benefit resulting from the relationships with the suppliers.
- e) **Confidentiality**. Suppliers will safeguard and make only appropriate use of confidential information received from Windle in the course of their business together. They should protect any information, data, or intellectual property from unauthorised access or misuse.

3.7 Audit

Windle Trust International shall be entitled to audit the supplier and subcontractors in order to verify whether they meet their obligations with regards to this code of conduct. The right to audit comprises the suppliers operations at all their locations, including the operations of subcontractors at all their locations. This entitlement includes the audit of all aspects of the supplier's and its contractors' processes related to the obligations under the Agreement.

The supplier will cooperate in the audit and the audit preparations and shall ensure that its subcontractors cooperate and participate, and shall make available and give access to all information required to conduct the audit.

4.0 Termination

Breach of this Supplier Code of Conduct is considered a material breach of the Agreement between Windle and the supplier.

5.0 Acknowledgement and Acceptance

This is to certify that I have fully read WTI's Supplier's Code of Conduct. Having fully read and understood it, I hereby commit myself and my company to serve this Code of Conduct and to fully comply with all of its principles. I also certify that I am authorised by my company to sign and accept this document on its behalf.

Supplier name:

Address and contact:

Supplier Representative's Name: _____

Signature: _____

Date: _____

Windle Trust International

Address and contact:

Windle Trust International's Representative's Name:

Signature: _____

Date: _____