

Supplier Code of Conduct

Responsible Business Practices



JOHN LEWIS
PARTNERSHIP

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WAITROSE

Introduction

The Partnership believes that corporate and social responsibility is an important part of our culture and we expect all our suppliers to act like us, in an ethical manner, taking account of our legal, social and environmental responsibilities. It is, therefore, expected that all suppliers will acknowledge this Partnership Supplier Code of Conduct, adhere to the spirit of it and where there may be differences or challenges clearly explain why or what is being done to address any gaps.



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Who the code applies to

This Supplier Code applies to all suppliers (which includes subcontractors, service providers, professional service providers, consultants, intermediaries and agents) to the Partnership and their employees in their work with the Partnership and throughout their supply chain.



Human Rights

The Partnership is committed to upholding human rights throughout our product and services supply chains.

We have a human rights policy in place, which is guided by the [UN Universal Declaration of Human Rights](#) and the [UN Guiding Principles on Business and Human Rights](#).

The [Human Rights Policy](#) sets out the standards we expect from all suppliers, partners, and service providers. It should be read in conjunction with our John Lewis Partnership Responsible Sourcing Code of Practice (RSCoP), which details our specific labour standards. Detail on the next page.

The Human Rights Policy takes a risk-based and proportionate approach to the implementation of the Policy, prioritising our due diligence and intervention efforts where the risks to human rights are most severe and where our leverage to effect change is greatest.

All suppliers are expected to agree with the provisions of the Human Rights Policy and if there are areas where they aren't able to comply they should explain to the Partnership how their policies, processes and standards are materially equivalent.



Responsible Sourcing Code of Practice (RSCOP)

The Partnership is committed to respecting the rights of workers throughout our product and services supply chains and collaborating to raise labour standards, ensure good working conditions and to create fairly rewarded employment.

It is expected that our suppliers meet the Partnership Responsible Sourcing Code of Practice (RSCOP) on issues such as pay, working hours, child labour, worker rights and representation. The provisions mirror the Ethical Trading Initiative (ETI) Base Code which draws on the International Labour Organisation's conventions.

Suppliers will be expected to read, agree and accept the Partnership Responsible Sourcing Code of Practice (RSCOP) when taking part in tenders. The complete RSCOP can be found [here](#).

All suppliers are expected to comply with the provisions of the RSCOP and if there are areas where they aren't able to comply they should explain to the Partnership how their policies, processes and standards address the fundamental principles of that provision and how their standards were developed in collaboration with workers.

The Partnership will monitor adherence to the RSCOP through risk assessment and ethical auditing and this information will be used to decide if we will source or continue to source from a supplier.



Supplier Assurance

The Partnership uses collects and assess evidence of compliance and assurance data. Suppliers that are invited to submit information will be expected to:

Supply all information requested including company contact(s) details, legal status, products & services, information security, data privacy and corporate responsibility.

If requested give more detailed responses on human resources, insurances, health & safety, information security, cyber security, payment card processing, labour standards & human rights, Environment, Sustainability and Governance (ESG)

If a requested supplier refuses to submit evidence they will be classified as non-compliant in the Partnership systems and this may affect future business as Supplier assurance is a requirement of all tenders.

Right to Audit

The Partnership reserves the right to audit its suppliers on compliance to the Supplier Code of Conduct and expects its suppliers to perform checks and audits to ensure that its supply chain is also adhering to this Code. Failure to comply with the Supplier Code may lead to contract termination.

No retaliation

The Partnership does not retaliate against any company or individual who reports in good faith any suspected breach to this Supplier Code of Conduct.

For further information and queries, please refer to the [JLP Supplier Portal](#)

Environment and Sustainability

The Partnership expects all our suppliers to act like us, by taking all reasonable steps to minimise any detrimental effect its operations may have on the environment, and to promote good environmental practice by:

- Conducting operations in an environmentally responsible manner and in accordance with applicable environmental laws
- Embracing and promoting sustainable initiatives



The Partnership expects that suppliers will, wherever possible, evidence to Partners (in tenders / contract reviews / product and service communications):

- Current and future planned actions on social value creation, use of social enterprises and the health & wellbeing of workers in the supply chain
- The removal of unnecessary packaging, processes or logistics and the impact in reducing waste and carbon footprint
- The replacement of single use products with more sustainable, reusable or home compostable alternatives
- Clear messaging on products as to how they can be recycled at the end of their useful life.

Health and Safety

The Partnership encourages leadership in championing the importance of health and safety in the workplace and expects all suppliers to provide:

A safe working environment for all workers and any visitors

Ensuring all workers, including those in your supply chain, to be adequately trained and equipped to safely carry out their work

All workers with the right to stop unsafe work

A report to the Partnership Head of Health and Safety on all incidents related to our project sites and in our workplaces



Acting with Integrity

Confidentiality

The Partnership expects all our suppliers to respect the confidential nature of our interactions and take all reasonable measures to prevent confidential information from being disclosed to any person who is not authorised to that information.

Gifts and Hospitality

The Partnership expects that suppliers will not offer, authorise or provide hospitality or gifts that may improperly influence, or create the appearance of improperly influencing business decisions, or decisions by our customers or others with whom we work

Honesty

The Partnership expects that suppliers will engage in and promote honest and ethical conduct, including in the management of any actual or apparent conflicts of interest between personal and professional relationships when dealing with Partnership business.

Anti Bribery and Corruption

The Partnership is committed to preventing bribery and corruption and in establishing a culture that does not tolerate corruption wherever and in whatever form it may be encountered. Suppliers are expected to:

Conduct business with integrity and not tolerate any form of bribery or corruption

Never request, accept, pay, offer or authorise bribes, either directly or indirectly

Never offer or make facilitation payments, nor permit others to offer or make such payments on your behalf

Conduct periodic bribery and corruption risk assessments, have appropriate anti bribery and corruption policies, and cascade similar anti bribery and corruption expectations to their own subcontractors and supply chains

Report in good faith any suspicions you may have that there have been instances of bribery and corruption, either suggested or committed during dealings with any Partnership employee, agent or associated business partner



Partners and those working on JLP sites should report concerns by following internal whistleblowing procedures. External concerns should be reported via <https://jlpspeakupline.ethicspoint.com/>

Anti Fraud

The Partnership is committed to preventing fraud in all its forms, even if this results in short-term business loss, missed opportunities, or delays. Suppliers are expected to:

Conduct business with honesty and integrity and foster an anti fraud culture through communication and training

Ensure all reports, records and invoices are complete and accurate and not false or misleading

Conduct periodic fraud risk assessments, have appropriate anti fraud policies, and cascade similar anti fraud expectations to their own subcontractors and supply chains

Investigate any suspected or actual instances of fraud. Making the Partnership aware of an investigation if the Partnership may be impacted

Report and take action against any fraudulent behaviour



Partners and those working on JLP sites should report concerns by following internal whistleblowing procedures. External concerns should be reported via <https://jlpspeakupline.ethicspoint.com/>

Fair Competition

The Partnership believes that fair competition drives efficiency and innovation, which are the basis of sustainable business. We are committed to fair competition and do not tolerate any violation of antitrust laws, competition laws or related regulations and expect our suppliers to:

Practise fair competition

Not participate in bid rigging by way of bid suppression, complementary or cover bidding, bid rotation, or other mechanisms that limit fair competition in tender situations

Not participate in any other form of cartel practices with competitors, such as dividing or allocating markets or customers or price fixing.



Protection of Assets

The Partnership has assets both physical and intellectual which it intends to protect from theft, damage or unauthorised copy and expects our suppliers to

Respect all assets of the partnership whether physical or intellectual from theft, damage or unauthorised copy

Only use or share the Partnership assets with prior consent from an authorised representative of the partnership

Maintain appropriate processes to manage the use and sharing of the partnership's assets by any employee, agent or other third party that you may appoint.



Reporting Concerns & Whistleblowing

The Partnership is committed to business integrity and working with our suppliers with an open, honest, and safe culture. We encourage anyone in our supply chain to speak up about unethical behaviour, safety risks, or regulatory breaches.

Speak Up with Confidence

If you suspect bribery, fraud, human rights violation, product standard concerns or other wrongdoings, your voice matters. All reports are handled professionally and can be submitted anonymously.

Confidential, Secure & Independent Portal

The JLP Speak Up Line can be used by suppliers, their employees, and those in surrounding communities to raise concerns which could negatively impact JLP or themselves. You can submit a report and follow up securely via our dedicated web portal:

<https://jlpspeakupline.ethicspoint.com/>

