

Ethical Code of Conduct for Suppliers

January 2026

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1 Introduction

Kirklees Council (“the Council”) is dedicated to conducting all commercial activities with integrity, transparency and fairness. The Ethical Code of Conduct for Suppliers (“the Code”) outlines the principles and expectations for suppliers delivering contracts on the Council’s behalf, ensuring that the highest standards of ethical and professional conduct are upheld throughout the supply chain.

The Council acknowledges the vital contribution suppliers make to the delivery of its services. Accordingly, any contractor, partner, consultant or supplier engaged in work for the Council, whether directly or through their employer, is considered a representative of the Council and is therefore expected to adhere to the Code.

This Ethical Code of Conduct for Suppliers was introduced following its approval at the Council Cabinet Meeting on 2 December 2025.

2 Compliance

This Code applies to suppliers and individuals working directly or indirectly on behalf of the Council. Adherence to the Code, along with its supporting policies and documents, is a mandatory condition of working with the Council. It is a collective responsibility to uphold these standards throughout the supply chain.

The provisions outlined in the Code do not override the Supplier’s contractual obligations to the Council. Suppliers are expected to always fulfil their contractual commitments. Where any conflict arises between the Code and the terms of a contract with the Council, the contractual terms will take precedence, but only to the extent of the conflict

By entering a contract with the Council, suppliers agree to be bound by the Code. They are expected to understand and adhere to its principles, including the required standards of conduct and behaviour. Any breach of the Code may constitute a breach of contract and will be addressed in accordance with the relevant contractual terms and conditions.

The Council expects suppliers throughout the supply chain to support the principles of the Code and to actively communicate and promote the principles to their own supply chains and act where appropriate, including termination of the business relationship and/or legal action.

3 Ethical principles and expectations

All suppliers will ensure that:

- They avoid any situation that could compromise, or appear to compromise, their honesty or integrity.
- They remain conscious of how their actions may be perceived by the public and take care not to expose themselves to allegations of misconduct.

- They uphold public trust and protect the Council's reputation by refraining from any behaviour, whether through action or omission, that could undermine either.
- They conduct all operations in full compliance with applicable laws, regulations, and standards in the jurisdictions where they operate.

3.1 Law and Ethical Standards

All Suppliers must:

- Comply with all applicable laws and regulations governing its business operations.
- Comply with all applicable laws in relation to workers' and human rights including the [Human Rights Act 1998](#).
- Comply with the provisions of the [Modern Slavery Act 2015](#) where applicable.
- Adopt and implement a robust whistle-blowing policy that empowers employees to report concerns confidentially and without fear of retaliation. This should specifically include mechanisms for reporting suspected instances of modern slavery, human trafficking, forced labour or other unethical practices
- Refer concerns for investigation through the [National Crime Agency's National Referral Mechanism](#) where any subcontractor is identified as potentially involved in modern slavery or human trafficking.
- Ensure their employees are aware that they are free to join a trade union and do not treat their employees unfairly for belonging to one.

3.2 Business integrity

Suppliers are expected to uphold the highest standards of ethical behaviour in all interactions with workers, subcontractors and customers.

All Suppliers must:

- Prohibit all forms of corruption, extortion and fraud within their operations and supply chains.
- Comply with international anti-bribery standards, including those outlined in the United Nations Global Compact.
- Adhere to all relevant local laws and regulations, including the [UK Bribery Act 2010](#).
- Refrain from offering services, gifts, hospitality or other benefits to Council employees with the intent to influence any aspect of Council business.
- Declare any actual or potential conflicts of interest that could compromise the impartial delivery of contractual obligations to the Council.
- Ensure prompt payment throughout the supply chain by settling all valid and undisputed invoices within 30 days of receipt, or by the due date specified in the invoice, whichever is later.

3.3 Health and safety

Suppliers are expected to uphold high standards of occupational health and safety in all aspects of their operations.

All Suppliers must:

- Comply with all relevant occupational health and safety legislation and regulations.
- Maintain a working environment that prioritises safety and supports employee wellbeing, with the aim of preventing accidents, injuries, and work-related illnesses.

3.4 Environment

Suppliers are expected to actively integrate climate protection and environmental sustainability into their operational practices. This includes taking meaningful steps to reduce environmental impact and promote resource efficiency.

All Suppliers must:

- Comply with all relevant environmental laws, regulations and standards.
- Implement systems to identify and mitigate environmental risks.
- Consider climate protection in their operations, including efforts to reduce emissions and promote sustainability.

3.5 Diversity and equality

Suppliers are expected to demonstrate a strong commitment to eliminating discrimination, advancing equality of opportunity and fostering positive relationships between individuals with protected characteristics and those without, both within their own organisations and throughout their supply chains.

All supplier personnel must:

- Adhere to diversity and inclusion policies, always treating others with respect and consideration.
- Appropriately address, document, or report any complaints related to discrimination or inappropriate conduct.
- Challenge unacceptable behaviour or practices or escalate concerns to a manager where necessary.

3.6 Safeguarding

The Council is committed to safeguarding and promoting the welfare of children, young people, and vulnerable adults.

Safeguarding involves protecting individuals' health, wellbeing, and human rights, ensuring they are free from harm, abuse, and neglect.

If a supplier's employee observes anything that may pose a risk to a child, young person or vulnerable adult, or has concerns about property conditions, signs of self-neglect or the wellbeing of an individual, they must report the matter to the Council without delay.

3.7 Customer care

All supplier employees must ensure that individuals with specific needs, such as physical or mental disabilities, medical conditions or other vulnerabilities, are treated with courtesy and that their dignity, safety, security, and wellbeing are always prioritised.

All supplier personnel must:

- Treat all customers with respect and professionalism.
- Adhere to statutory, professional and locally agreed standards of customer care.
- Avoid unlawful discrimination and actively prevent harassment or victimisation of any individual.
- Respect and where appropriate, support the personal views, preferences and needs of customers and clients.
- Communicate with the Council in an open, honest and transparent manner.

4 Review process

The Council will review this document annually to ensure it remains a live and up to date document.

| Version | Summary | Date | Approval |
|---------|--------------|--------------|-------------------|
| 1. | New document | January 2026 | Cabinet (2/12/25) |