



NWUPC Ltd Ethical Code of Conduct – March 2020



This code is a description of what NWUPC Ltd deems to be acceptable ethical practices.

Compliance with Applicable Law

We comply with all laws and regulations that apply to the Consortium and its Members. Should any aspects be considered by us to be inadequate or ambiguous, our aim is to set a higher ethical standard exceeding the basic requirements of applicable law.

Business Relationships

When dealing with suppliers we will aim to:

- Be objective in choosing suppliers that can meet the needs of our Members
- Not make decisions based by personal opinions or relationships
- Act with integrity, conducting all dealings professionally and fairly
- Ensure promises are kept both orally and where required in writing
- Apply our ethical principles across the supply chains impacting on NWUPC Ltd
- Follow the Chartered Institute of Purchasing and Supply's Corporate Code of Ethics <https://www.cips.org/en-GB/cips-for-business/performance/ethics/corporate-code-of-ethics/>

Use of Best Practice

NWUPC Ltd will, where appropriate, use best practice such as:

- Chartered Institute of Purchasing and Supply's Code of Conduct for its Members https://www.cips.org/Documents/About%20CIPS/CIPS_Code_of_conductv2_10_9_2013.pdf
- Compliance with Legislation and Procurement Guidance at:- <https://ccs.cabinetoffice.gov.uk/i-am-buyer/introduction-buyers/current-procurement-regulations>

Avoidance of Conflicts Of Interest

NWUPC Ltd will ensure:-

- That any interests of its staff or other officers are declared
- That individuals do not have an undeclared interest in any organisation that:
 1. has a trading relationship with NWUPC Ltd
 2. is tendering for goods and/or services for NWUPC Ltd and/or its members.

Where any conflicts of interest (real or perceived) exist a Declaration of Personal Interest Form should be completed. Declarable interests are links with firms and include:

- Financial interests in, or employment of, staff (or their immediate family members - spouse, parents, grandparents, children, grandchildren, siblings and **immediate** in-laws (mother-in-law, father-in-law, brother-in-law and sister-in-law). Adopted children and stepchildren also count as **immediate family** members) with suppliers to the NWUPC Ltd
- Loans from suppliers to staff (or their immediate families), but excluding loans from banks, insurance companies and others for whom this activity is their main area of business.

NWUPC Ltd seeks to uphold the highest professional standards as per CIPS and its members' expectations. Further details of its operational arrangements can be found in its Strategy, Memorandum and Articles, Members Agreement and Whistleblowing Policy.