



SUPPLY CHAIN CODE OF CONDUCT

DFTO Code of Conduct for Business Partners

Introduction

In this DFT Operator Limited (DFTO) code of conduct for business partners, DFTO has defined the requirements and principles for its business dealings with business partners, particularly those relating to compliance with ethical standards, applicable laws as well as integrity. Business partners are the suppliers that provide goods, services or works to DFTO.

We recognise the importance of the role that our business partners play in the delivery of our objectives and services to the public. As a public service authority, it is important to us that we are working with trusted suppliers who uphold the same values that we do.

Scope

DFTO is the government’s public sector rail owning group and we understand the vital role that our railways play in joining up our economy and communities and the opportunities that it presents. As delivery partner for the public ownership programme, we are committed to deliver in an ethical and sustainable manner and passionate about making a difference to the communities we serve.

Commercial success and socially responsible actions do not contradict each other – in fact, they are interdependent. We see sustainable and responsible conduct as an important foundation in relation to business dealings with our business partners. The objectives of our code of conduct are to support building trusted relationships with our business partners, setting out the behaviours and values that we expect in each other.

Corporate Social Responsibility of our Business Partners

DFTO considers social, environmental and economic responsibility as important for the long-term success of our company and consequently an indispensable element of our value-driven corporate management.

We will align with public sector principles such as the Government Commercial Function code of conduct and work within the bounds of Procurement Act 2023 (PA23) and associated policy updates. We understand that suppliers are an extension of our business. We therefore expect that our business partners will align their conduct with the following principles.

Human Rights & Employment law Our business partners must comply with all applicable human rights and employment laws within the jurisdictions in which they work. Our business law

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partners remunerate their employees adequately and have robust measures to ensure their subcontractors also comply.

Slavery and Human Trafficking

DFTO supports the objectives of the [Modern Slavery Act 2015 - GOV.UK](#) of eliminating slavery and human trafficking and expects that its business partners comply with the same principles and all applicable laws to reject any forced labour or trafficking.

Equal Opportunities & Respectful Treatment

We want everyone associated with our business to have a fair and equal opportunity to achieve their very best in a safe working environment, to understand the importance of this, and to always act consistently with it. We recognise that employees and service users have the right to respectful treatment.

We will not tolerate discrimination or harassment in our business, and we will never victimise anyone who makes a legitimate complaint to us about harassment or discrimination, or anyone who supports a colleague in their complaint.

We expect our business partners to provide the same commitment, including to their own employees and to promote diversity within their organisations and to not tolerate any discrimination.

[The Equality Act 2010](#) protects against discrimination, harassment and victimisation.

Safety

Putting the safety of people first is at the core of our business and we expect our business partners to follow the same values. Together with their employees, our business partners provide both for a safe working environment and appropriate safety related qualifications as well as for the safety of their products and services.

As the government’s public sector rail owning group for train operators, which are subject to demanding safety regulations, we and our partners are required to lead by example, for example, by taking steps to ensure no employees are under the influence of alcohol or drugs when providing services or products to our business.

Environmental & Sustainable procurement

Our business partners to comply with all legal and contractual obligations and are aware of and support DFTO to comply with all applicable environmental and social value legislation and standards. DFTO will consider the economic, environmental and social benefits within their procurements and has regard to the National Procurement Policy Statement (NPPS). We expect that business partners will support and commit to social value delivery through their contracts and activities.

DFTO is committed to support the government’s target to achieve net zero by 2050 and expect our suppliers to support this. Suppliers must employ best available techniques to ensure that our natural environment is protected, and where possible enhanced, supporting us to understand the reduction of supply chain impacts and risks to the environment.

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Business Practices

Anti-Corruption & counter Fraud DFTO has zero-tolerance for bribery and corrupt activities. It is committed to acting professionally, fairly, and with integrity in all business dealings and relationships. DFTO is bound by the laws of the UK, including the [Bribery Act 2010 guidance - GOV.UK](#), regarding its conduct both at home and abroad.

We expect suppliers adhere to anti-corruption laws and to have robust processes to ensure that the subcontractors in their supply chain also comply with these laws. We expect suppliers to act honestly, fairly, and openly, and to fully comply with their tax obligations.

Data Protection & Cyber security Our business partners comply with all applicable laws for the protection of personal data, particularly of employees, business partners and customers. It is essential that our business partners safeguard the integrity and security of their systems and comply with the relevant government standards and guidance as will be set out by the DFTO.

Avoidance of Conflicts of Interest Our business partners avoid conflicts of interest that may lead to corruption risks. We expect our suppliers to mitigate appropriately against any real, potential or perceived conflict of interest through their work with DFTO.

Corporate Criminal Offence Our business partners take appropriate measures to comply with the Criminal Finances Act and have proactive controls in place to ensure they or their partners do not facilitate tax evasion.

Conduct & Standards of behaviour

DFTO strives to always act as a fair and responsible market participant and expects the same from its business partners.

Prompt Payment DFTO supports, promotes, and applies the principles of our Fair Payment Pledge in the engagement of third-party services. We expect that our business partners are fair and reasonable in their payments and will comply with the provisions within the Fair Payment Pledge.

Competition Laws Our business partners comply with all relevant competition laws. They do not make agreements and arrangements that influence prices, conditions, strategies or customer relations, especially regarding participations in tender procedures.

Export- and Import Controls / Combating Terrorism Our business partners observe compliance with all applicable laws regarding the import and export of goods, services, and information as well as the laws on combating international terrorism.

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Compliance with the DFTO Supply Chain code of conduct

Reports to the DFTO Group Both parties will be open and transparent with each other. Our business partners use the opportunity to make reports on any concerns or instance of non-compliance that occurred in the course of their business activities for DFTO, and which may have effects on DFTO through the existing reporting systems of DFTO.

Protection of Whistleblowers Our business partners do not tolerate any discrimination against persons who report violations of the principles set out in this DFTO Supply Chain Code of Conduct.

This policy will be used as the foundation for our relationships with business partners. We will include this policy in our tenders and onboarding processes, and when offering and awarding business to suppliers. This policy will be integrated into supplier contracts.

We will engage with our suppliers to encourage continuous improvement in performance and measure progress. Suppliers' performance against the principles of this policy will be reviewed at regularly scheduled business meetings, complemented by supply chain risk assessments.

We will monitor compliance with this policy and reserve the right to visit suppliers' and subcontractors' facilities to audit performance. Further, we reserve the right to monitor any tier of our supply chain.

Equally, and where necessary, we will work with suppliers to create a corrective action plan for achieving compliance in clearly defined and reasonable timeframes. If non-compliance is deemed serious, we reserve the right to apply sanctions, which can include immediate termination of our business relationship as further set out in relevant contracts.

Where to find further Information In case of doubt or questions, please contact your nominated contact person at DFTO.

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