



# Bytes Technology Group

## Supplier Code of Conduct

Dated: 8<sup>th</sup> December 2020

## About Bytes Technology Group

Bytes Technology Group ('Bytes') is a leading provider of world-class IT solutions. Our growing portfolio of services includes cloud, security, licensing, SAM, storage, virtualisation and managed services.

Since being established in 1982, Bytes has grown rapidly and now employs around 700 people in the UK and Ireland. Thanks to our passionate people and close partnerships, we have helped hundreds of top brands to transform, grow and adapt to the changing technology landscape.

Bytes Technology Group is formed of Bytes Software Services Limited and Phoenix Software Limited.

## What We Do

Bytes is a leading Value-Added Reseller and have a wide range of services around the following areas:

- End User Computing Services
- Security Solutions
- Cloud Services
- Data Availability Services
- Datacenter Services
- SAM Services
- Deployment Services and FastTrack
- Latest ISV Technology
- Training Services
- Hardware Services

## Mission and Values

Bytes prides itself on its corporate values and promotes these to its employees, customers and suppliers.

As a Value-Added Reseller, we strive to give value for money on the products and services we offer, always aiming to reduce cost for customers by providing innovative solutions, but also working with them in an ethical and fair manner.

Bytes also ensures its suppliers are treated fairly, ensuring invoices are paid in a timely manner as well as promoting fair commercial arrangements that will ultimately benefit them and our customers.

Bytes encourages all suppliers that the products they supply are from ethical sources, and wherever possible are Fairtrade. This includes ensuring that human rights are adhered to throughout the supply chain. We only work with responsible partners and suppliers who are regularly assessed and reviewed to ensure that they are competitive, ethical, socially responsible and have excellent quality and environmental practices.

Bytes is an ethical employer and is committed to raising the well-being, living standards, skills and health of all its staff.

## Legal Regulatory and Ethical Standards

Bytes requires all its suppliers to comply with all applicable laws, regulations and standards, including but not limited to DPA 2018, Bribery Act 2010, Criminal Finances Act 2017, and Modern Slavery Act 2015.

## Equality and diversity

Bytes expects its suppliers to uphold the same values about equality and diversity in the workplace as we do.

### ▪ Diversity

Bytes understands the need for diversity in the workforce and believes that this provides a wider opportunity for team members to join us and provide a better business service to our customers.

- *Respect*

Bytes respects the identities and cultures of employees, customers and all other stakeholders. The same is expected of all suppliers.

- *Non-discrimination*

Bytes promotes and strictly enforces that our workplace is free of harassment of any nature. Staff shall not be threatened in any way or be subjected to any sort of harsh or inhumane treatment, including but not limited to mental or physical coercion, sexual harassment or abuse, verbal abuse, or unreasonable restrictions regarding entering or exiting company provided facilities. There is zero tolerance for discrimination based on but not limited to race, colour, ethnicity or national origin, age, gender, sexual orientation, disability, religious views, political affiliation, or marital status.

- *Compensation and working hours*

Bytes supports equal pay for work of equal value and complies with national laws and regulations regarding working hours, minimum wages and benefits. Working hours or overtime hour shall not exceed the maximum permitted by applicable laws and regulations. Staff shall always be given reasonable notice for overtime. Staff shall be paid on time at regular intervals as agreed at the time of employment.

Bytes is a Living Wage Employer and expects its suppliers to either be a Living Wage Employer or adhere to the standards set out by the Living Wage Foundation.

Bytes adheres to the obligations set out in our [Equality Diversity and Inclusion Policy](#) and expects its suppliers to follow the same in principle.

### **Modern Slavery Act**

All suppliers are expected to fully comply with the obligations set out in the Modern Slavery Act 2015, including but not limited to the commitment to having a slavery-free supply chain. Suppliers with an annual turnover of more than £36 million are required to produce and publish a Slavery and Human Trafficking Statement each financial year.

Bytes adheres to the obligations set out in our [Modern Slavery Act Policy](#) and expects its suppliers to follow the same in principle.

### **Health, Safety and Well-Being**

All of Bytes' suppliers and contractors must comply with the health and safety legislation relevant to the extent of the works or goods supplied. We expect suppliers and contractors to provide all their employees and others under their control with appropriate training, instruction, information, personal protective equipment, and a safe working environment. Any contractor working on behalf of Bytes must also meet specific requirements as outlined in their contract. Suppliers shall commit to ensuring safe working conditions and a healthy environment for all staff, to aid in the prevention of work-related injuries and illnesses and improvement to well-being.

Bytes adheres to the obligations set out in our [Health and Safety policy](#) and expects its suppliers to follow the same in principle.

### **Business Continuity Planning**

Bytes' supply chain is an integral part of the service provided to our customers. It is essential that our suppliers have a robust business continuity plan in place to protect their operations, and so far as is reasonable, protect the operations of Bytes' business operations to the extent that we rely on the Supplier. Events during which Bytes expects a business continuity plan to be implemented include natural disasters, illness and infectious disease outbreaks, terrorism and software viruses.

Bytes adheres to the obligations set out in our [Business Continuity and Management Strategy Policy](#) and expects its suppliers to follow the same in principle.

## **Honesty, Integrity and Fair Business**

Honesty and integrity are core to Bytes' values as a business. It is an expectation that Bytes' suppliers operate with honesty, integrity and transparency in all activities carried out as a business, complying with all relevant legislation including Money Laundering Regulations 2017 and the Bribery Act 2010.

In accordance with the Bytes policy regarding gifts and entertainment, we do not permit any form of gifting or entertainment which could, or could be perceived to, improperly influence or induce individuals at BTG into procuring from any supplier where they may not ordinarily have done so.

Bytes adheres to the obligations set out in our [Fraud, Bribery and Money Laundering Policy](#) and expects its suppliers to follow the same in principle.

## **Quality of Service**

Bytes is dedicated to the provision of high-quality services and products to its customers and maintaining a quality management system which ensures we meet the principles of quality, cost and delivery expected by customers.

Bytes adheres to the obligations set out in our [Quality Policy](#) and expects its suppliers to follow the same in principle.

## **Whistleblowing**

Bytes respects the rights of staff, contractors and other stakeholders to raise their concerns about possible wrongdoing within the business. Bytes has well established procedures in place allowing for the confidential disclosure of such concerns such that an investigation may be made into the allegations.

It is an expectation that Suppliers shall establish and implement procedures to ensure the protection of whistle-blower identities, including the ability to make a confidential disclosure to the relevant team member and safeguarding against retaliatory actions which may take place as a result of whistle-blowing made in good faith.

## **Open and Fair Competition**

Bytes complies with the competition legislation. Suppliers shall uphold standards to safeguard fair conduct of business, competition and not obtain undue advantages, and shall not engage in practices including price fixing, bid rigging or blacklisting.

## **Environmental**

As an integral part of Bytes' values and operations, it expects its suppliers to share the same considerations of mitigating harmful impact on the environment and climate. Preferably there shall be an environmentally trained person employed at or supporting the Supplier.

Bytes holds the ISO14001 accreditation and suppliers are encouraged to strive for the same, or to follow the guidelines for such accreditation in principle.

Bytes adheres to the obligations set out in our [Environmental Policy](#) and expects its suppliers to follow the same in principle.

## **Data Protection Act 2018**

Bytes expects its supply chain to protect all data that is provided to them in the course of business, to an appropriate standard as not to cause our Company to lose compliance or regulation through a deliberate act, negligence or ignorance. Personal, sensitive or confidential information must not be disclosed to a third party (either by accident or deliberately) without our prior agreement and must be handled according to current, relevant legislation (e.g. Data Protection Act 2018).

Bytes adheres to the obligations set out in our [GDPR policies](#) and expects its suppliers to follow the same in principle.

## **Cyber Security**

We expect all our suppliers to obtain a minimum of Cyber Essentials accreditation or higher to ensure that their own systems and supply chain are as secure as possible.

Bytes adheres to the obligations set out in our [Information Security Policy](#) and expects its suppliers to follow the same in principle.

### **Prompt Payment**

Bytes strives to pay all invoices within 30 days of receipt of an undisputed invoice and expects its suppliers to do the same.

### **Legal Requirements**

Suppliers shall identify, monitor and understand applicable laws, regulations and customer requirements regarding corporate responsibility. Adequate documentation and records to evidence regulatory compliance and licences to operate shall be in place.

### **Audits Rights**

Bytes may, at its own expense and in any case no more than once per calendar year, use its own audit process and / or external auditors to assess its supplier's compliance with any of the issues listed in this Supplier Code of Conduct. There shall be a process for correction of responsibility deficiencies identified in audits.

### **Conclusion**

Bytes requires its suppliers to adhere to the policies as outlined within this Supplier Code of Conduct, and commit to promoting and protecting (as far as possible) the human rights of everyone who works for Bytes Technology Group and all those who have dealings with the group.

Where it is found that a supplier does not comply with this Code of Conduct, or upon discovery of material and non-justifiable non-compliance and it fails to commit to a plan of action to remedy the same, Bytes may elect to discontinue the relationship with them.