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Introduction

Bytes Software Services Limited ('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 750 people in the UK. 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 Software Services Ltd is a fully owned subsidiary of Bytes Technology Group.

Mission and Values

Bytes is a leading Value-Added Reseller that delivers secure cloud planforms, analytics and apps.
We have a wide range of services around the following areas:

- End User Computing Services
- Security Solutions
- Cyber Consultancy
- Cloud Services
- Data Availability Services
- Datacenter Services
- SAM & IT Service Management Services
- Deployment Services and FastTrack
- Latest ISV Technology
- Training Services
- Hardware Services

We are deeply committed to conducting business with integrity, transparency and respect for all individuals and communities. As a leading provider of innovative technology solutions, we believe that the foundation of our success lies in the strength of our relationships with suppliers, partners and customers. Our Code of Conduct sets out the principles and expectations we uphold in all dealings with suppliers. This Code ensures that our suppliers share our dedication to ethical business practices, sustainability and respect for human rights. Key areas include:

- Labour Practices
- Environmental Responsibility
- Compliance with Laws
- Commitment to Fairness and Equality

By adhering to these guidelines, we aim to foster responsible and mutually beneficial partnerships that support the success of both Bytes and our suppliers. We believe that maintaining high standards of conduct is essential for building trust, promoting sustainability, and contributing to the well-being of the communities in which we operate. We expect all suppliers to comply with this Code and to continuously strive to improve their practices in alignment with these values.

Purpose

This Code establishes clear and consistent guidelines for all suppliers engaged with Bytes. It outlines the ethical, environmental and social standards that suppliers are expected to adhere to, aligning with Bytes' commitment to integrity, sustainability and respect for human rights.

By setting these standards, the Code ensures our supply chain operates responsibly, upholds high ethical conduct and contributes to broader social and environmental sustainability goals. It fosters mutual trust and accountability, ensuring transparent, law-compliant business practices that positively impact society and the environment.

Our Code serves as a foundation for responsible business relationships, promoting fair treatment, minimising risk and driving continuous improvement in the delivery of products and services. Ultimately, it is a tool to help build a sustainable, ethical and successful supply chain for all stakeholders.

Scope

This Code applies to all suppliers, vendors, contractors and service providers engaged with Bytes Software Services. It includes those providing products, services, or labour on behalf of the company, regardless of their location or scale of operations. This Code extends to all tiers of the supply chain, from direct suppliers to sub-contractors and any third parties involved in the provision of goods and services.

It covers all business interactions and relationships that occur during the procurement and delivery processes, and it is intended to be adhered to by suppliers throughout the entire duration of their business relationship with Bytes. It applies to suppliers' employees, operations and supply chain activities, as well as their compliance with relevant laws, regulations and best practices.

By complying with this Code, suppliers acknowledge their responsibility to uphold the ethical, legal, environmental and social standards set forth in this document, ensuring that all products and services provided meet the high standards expected by Bytes.

Supplier Expectations and Standards

Compliance with Laws and Regulations

Bytes requires all its suppliers to comply with all applicable local, national and international (where applicable) laws, regulations and standards, including but not limited to Bribery Act 2010, Modern Slavery Act 2015, Criminal Finances Act 2017, DPA 2018, NIS, DORA and NIS2.

Suppliers should uphold high standards of ethical business practices, including transparency, honesty and fairness in all dealings.

Honesty, Integrity and Business Ethics

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.

Suppliers must not engage in or condone any form of corruption, bribery or unethical business practices. This includes offering or accepting bribes, kickbacks or any other improper financial incentives.

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 & Money Laundering Policy and expects its suppliers to follow the same in principle.

Labour and Human Rights

Suppliers must respect the fundamental rights of workers, ensuring they are treated with dignity and respect. This includes, but is not limited to, the prohibition of forced, bonded and child labour. Bytes respects the identities and cultures of employees, customers, and all other stakeholders, and expects the same from all suppliers.

Compensation and Working Hours

Employees should be compensated fairly, receiving wages that meet or exceed local minimum wage requirements. Suppliers should ensure reasonable working hours and access to appropriate health and safety measures.

Bytes supports equal pay for work of equal value and complies with national laws and regulations regarding working hours, minimum wages and benefits. Overtime should not exceed legal limits, and staff should be given reasonable notice and paid on time. 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 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.

Non-discrimination

Bytes promotes a workplace free of harassment and requires suppliers to enforce this strictly. 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. Equal opportunity should be provided to all employees and workers.

Sexual Harassment

Bytes is committed to taking all reasonable and proactive measures to prevent sexual harassment, third-party harassment, and other forms of harassment and discrimination. This includes ensuring that all employees, contractors, suppliers, customers, clients, visitors, and other third parties can raise concerns through appropriate reporting channels, enabling incidents to be investigated thoroughly and addressed effectively.

In accordance with our Sexual Harrasment Policy, suppliers must take all appropriate and proactive steps to prevent sexual harassment, third-party harassment, and other forms of harassment and discrimination within their workforce and in any interactions connected with the provision of services to Bytes. This includes maintaining appropriate policies and reporting procedures, providing relevant training and awareness, investigating concerns promptly, and taking appropriate action where unacceptable behaviour is identified.

Suppliers must ensure that concerns can be raised safely and that all reports are handled fairly, investigated appropriately, and addressed without undue delay. Suppliers are also expected to cooperate fully with any investigation undertaken by Bytes relating to alleged misconduct involving individuals engaged in the delivery of services.

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 & Safety Policy and expects its suppliers to follow the same in principle.

Modern Slavery Act

Suppliers must fully comply with the Modern Slavery Act 2015, ensuring 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 Policy and expects its suppliers to follow the same in principle.

Environmental Responsibility

As an integral part of Bytes' values and operations, we expect our suppliers to share our commitment to mitigating harmful impacts on the environment and climate. Suppliers are encouraged to source products ethically, prioritising Fairtrade options whenever possible. Ideally, suppliers should employ or have access to an environmentally trained professional.

Bytes holds the ISO14001 accreditation and encourages suppliers to strive for the same or to follow its guidelines in principle. We adhere to the obligations set out in our Environmental Policy and expect our suppliers to do the same.

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.

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.

Suppliers must protect any confidential or proprietary information shared by Bytes and ensure it is not misused or disclosed to unauthorised parties.

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 60 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 Code. These may include on-site inspections, review of records and interviews with employees or management. Suppliers are expected to cooperate fully in any such audits and provide relevant documentation or information to verify compliance.

In cases of non-compliance, suppliers must take prompt corrective actions to address and rectify the issue. Bytes will make reasonable efforts to work with the supplier to implement these corrective actions. However, if corrective actions are not undertaken within a reasonable timeframe, or in cases of severe or repeated violations, Bytes reserves the right to terminate the business relationship.

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 whistleblowing 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.

Responsibilities

Adherence to the Code

Suppliers are required to read, understand and comply with the terms of this Code. Suppliers should implement internal processes to ensure compliance with this Code and ensure that their employees and sub-contractors also adhere to its principles. Failure to comply may result in the suspension, termination or re-evaluation of the business relationship with Bytes.

Ongoing Monitoring and Reporting

Suppliers must regularly assess their compliance with this Code and report any violations or risks that may arise. Suppliers should provide Bytes with necessary documentation or evidence to demonstrate adherence to the Code upon request.

Conclusion

At Bytes, we believe that a responsible, ethical supply chain is essential to our success and reputation. By upholding the principles outlined in this Code of Conduct, we aim to build and maintain partnerships based on trust, transparency and respect. We are committed to working with suppliers who share our values and are dedicated to improving the quality of life for individuals and communities around the world.

Together, we can contribute to a sustainable and ethical future.