

# Supplier Code of Conduct

January 2026

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# Foreword

Ordnance Survey (OS) is Britain's mapping agency, providing mapping data and services to government, business and the public.

OS relies on its suppliers and partners to help deliver many of its goods and services, and while there's a contractual relationship between both parties, we also expect a bond of trust.

Being a government-owned company, our government shareholders and taxpayers expect our suppliers to look after their and OS's interests and to deliver on the promises they make. They also expect suppliers to behave ethically and treat their service users, employees and sub-contractors fairly and with respect.

It is important to publicly state these expectations in a Code of Conduct. Suppliers are an extension of our business who interact with our customers and staff on our behalf every day. This Code of Conduct is in place to help you, our suppliers, understand the standards and behaviours expected when you work with OS.

These standards apply to all OS employees, directors and managers, and OS expects the same commitment from our suppliers, their employees, partners and sub-contractors.



Nick Bolton, Chief Executive Officer

# Introduction

The purpose of this Supplier Code of Conduct is to share our expectations and fundamental principles, which should extend into your own supply chain. We value our business relationship with you, as you play an essential part in helping us to create a more socially and environmentally responsible supply chain.

We want you to carry out your business in line with the values and aspirations outlined in this Code of Conduct.

We expect all our suppliers and partners to act with the highest professional standards, integrity, and good faith and in doing so comply with all relevant laws, regulations and licences when working with OS. Suppliers will need to behave in an ethical manner, treating everybody with respect, fairness and dignity. These are in line with our core values and we expect our suppliers to meet these.

Equally, our suppliers will give due consideration to the impact on their local communities and the environment in conducting their business. OS is a strong advocate of Corporate Social Responsibility and will ensure our suppliers keep to the law, regulations and our policies.

When selecting suppliers, OS undertakes stringent background checks to ensure that it contracts with reputable bodies. These background checks are carried out in line with procurement regulations that guarantee fair access to opportunities for all suppliers, and equal treatment during selection processes.

As procurements move through delivery phases, we expect supplier performance to be in accordance with the spirit of the contract as well as to the contract detail itself. We expect our suppliers, in delivering goods and services, to act in a way that is compatible with public service values, upholds the reputation of OS and wider government, promotes innovation and expertise, and contributes to growth and prosperity in the UK.

We also expect our employees to treat suppliers with fairness and respect. Our assumption should be that everybody comes to work every day determined to do a good job. In return we expect suppliers to treat our employees in the same way and seek to build trusting and effective collaborative relationships that are focused on delivering for OS and the wider public.

As a statement of good practice, this Code of Conduct should be read by OS's current and aspiring suppliers, and by their sub-contractors in their supply chains. We expect our suppliers to communicate this Code of Conduct to employees, their parent company, subsidiaries and sub-contractors, as it will form part of any contract agreement.

Any questions about this code should be referred to Matt Keatley, Head of

## Employees and service users

### Respectful treatment

Our staff and customers have the right to respectful treatment. We will not tolerate discrimination, harassment or victimisation in the workplace or in connection with any of the services delivered on our behalf.

We expect our suppliers to provide the same commitment to their own employees and any of their sub-contractors. The Equality Act 2010 protects against discrimination, harassment and victimisation.

### Professional behaviour

We expect suppliers to be prepared to invest in their relationships with OS and establish trust with our staff and other suppliers involved in delivering goods and services. We also expect our suppliers to speak out when OS staff or other suppliers are not upholding the values in this Code of Conduct. Suppliers will be able to speak out without fear of consequences when a project or service is unlikely to succeed because of our behaviours or a lack of good governance. Our suppliers must comply with all relevant legislation mentioned in this Code of Conduct as well as the Fair Payment Code and General Data Protection Regulations as well as all health and safety and environmental legislation. It is also expected that suppliers will treat OS staff and customers in a professional manner and with respect and dignity at all times.

### Human rights and employment law

Suppliers must comply with all applicable human rights and employment laws in the jurisdictions in which they work and have robust means of ensuring that the sub-contractors in their supply chains also comply. This includes complying with the provisions of the Modern Slavery Act 2015.

## Business practices

### Health and safety

Suppliers must conform to all the relevant regulations and legislation in respect of health and safety in delivering services to or on behalf of OS. It is expected that all suppliers will manage health and safety robustly and demonstrate industry good practice and ensure that a secure, healthy and safe environment is in place for all our employees and members of the public. Any relevant risk assessments and appropriate mitigation reports should be shared with relevant members of OS staff before any work starts. If a supplier is to be the subject of any prosecution or impending investigation relating to a breach of health and safety

regulations, they should inform OS at the earliest opportunity. Failure to keep OS updated on these issues may lead to the termination or cancellation of the contract.

### **Management of risk**

OS ensures that risk is placed with the party best able to manage it. This means prime contractors should not flow risk inappropriately to sub-contractors. All parties should also be prepared to share intelligence of supply chain risks so that material, commercial and operational risks such as the impact of losing a key supplier, cyber risk etc. can be mitigated.

### **Continuous improvement**

We expect our suppliers to use recognised industry practices to deliver goods and services to, or on behalf of, OS. We also expect suppliers to continuously improve these goods and services and bring world-class innovation, ideas and expertise to help government address its strategic challenges and to support growth and prosperity in the UK.

### **End-to-end delivery**

Some of the services that OS needs are complex, and in some cases no single supplier will have complete contractual responsibility for every element of the required good or service to deliver to OS or OS's end users. We expect suppliers to be aware of how they contribute to that overall delivery, and to work with OS and other suppliers to ensure their products or services are used effectively to deliver a high-quality service. We expect suppliers to behave to required standards and be forthcoming with information needed where a contract is coming to an end and is in a transitional phase leading to contract exit.

### **Value**

OS, its government shareholder, and the UK taxpayer expect value-for-money for every pound that it spends and be able to demonstrate the long-term value of contracts. This means that contracts should be priced to offer sustainable value throughout their life, including when changes are needed. While OS accepts our suppliers make a profit margin in return for the risk they are accepting, we expect suppliers not to exploit an incumbent or monopoly position, an urgent situation or demand need or, to exploit or impose opportunistic pricing. We expect suppliers to work in good faith to resolve any disputes promptly and fairly during the life of the contract through good relationship management and where appropriate, contractual dispute resolution mechanisms.

### **Reputation**

We want to work with suppliers who are proud of their reputation for fair dealing and quality delivery. Also, we want working with OS to be seen as reputation-enhancing for the supplier. Reputations can be lost quickly either by

exaggerating the extent of benefits or not acting in the best interests of OS. We expect suppliers to be protective of OS's reputation and ensure neither they nor their sub-contractors or partners bring OS into disrepute by engaging in any act or omission which is reasonably likely to diminish the trust that government, business and the public have in OS.

### **Cyber security**

It is essential that suppliers safeguard the integrity and security of their systems and comply with relevant government standards and guidance. Suppliers must inform OS immediately if they become aware of any cyber security incident that affects, or has the potential to affect, OS data.

### **Environmental management & sustainability**

OS recognises the value of sustainability and we're committed to business practices that preserve natural resources. We therefore expect our suppliers to comply with the Environmental Protection Act 1990 and the Environment Act 2021, and support OS in complying with its legal and contractual obligations to procure sustainably and ethically. We expect our suppliers to help OS reduce supply chain impacts on our environment and the risks associated with delivering sustainable and ethical goods and services.

### **Carbon Net Zero**

We are committed to achieving net zero in line with the UK Government's 2050 net zero target and are striving to accelerate this timeframe within our own operations and supply chain. We have set ambitious targets to reduce our overall greenhouse gas emissions and reduce our Scope 1 and Scope 2 emissions by at least 85% by 2025 from a 2019-20 baseline. We therefore require our suppliers and their supply chains, to demonstrate their commitment to achieving net zero and to work positively with OS, or its designated subcontractors in making significant progress towards net zero throughout the course of the contract period relevant to the services being delivered. Suppliers and their respective supply chains will be required to report, on an annual basis, their own activities and progress towards carbon net zero targets as part of any contractual engagement.

### **Armed Forces Covenant**

OS proudly supports and have signed the Armed Forces Covenant, joining the national commitment to ensure fair treatment for those who serve or have served in the armed forces, as well as their families, including those who are bereaved. OS recognizes the importance of treating members of the armed forces with respect and fairness in the communities, society, and economy they serve. By signing the Covenant, we acknowledge the invaluable contributions of serving personnel, reservists, veterans, and military families to our community. We encourage all companies and organisations we work with to sign and support the Covenant if they have not already done so.

### **Confidentiality**

Suppliers are expected to comply with the provisions in their contracts and any legal requirements to protect sensitive information. OS suppliers may also be party to confidential information not covered by contractual provisions. We expect this information to be handled with the same care and diligence internally as externally.

### **Conflicts of interest**

We expect our staff not to deal directly with suppliers if they hold a vested interest in them, and we expect our suppliers to mitigate appropriately against any real or perceived conflict of interest through their work with OS. A supplier with a position of influence gained through a contract should not use that position to unfairly disadvantage any other supplier or reduce the potential of fair or future competition.

## **Standards of behaviour**

### **Ethical behaviour**

OS expects the highest standards of business ethics from suppliers, their partners and sub-contractors. OS expects its suppliers to have good governance and audit processes in place to ensure that standards are upheld and maintained, and that business ethics are always adhered to. It is expected that all relevant legislation, such as the Modern Slavery Act 2015, is adhered to whether in their own business or that of their supply chain partners.

### **Transparency**

We expect suppliers to be open and honest in their dealings with OS and where required supply relevant information contractually or requested directly during the contract lifecycle. This may be related to the supplier's financial wellbeing or information related to contract costs, revenue and margin.

### **Treatment of sub-contractors**

OS expects suppliers to deal fairly with sub-contractors in their supply chain and observe the principles of the Fair Payment Code. We expect suppliers to avoid flowing unreasonable levels of risk to sub-contractors who can't reasonably be expected to manage or carry these risks. OS expects suppliers not to create barriers to the use of small and medium enterprises who are qualified to provide goods and services and to encourage innovation in their supply chain to increase the value or quality of supply.

### **Supporting SMEs and Delivering Social Value**

We are committed to the principles of the Procurement Act 2023, including the promotion of fair and open competition, and the delivery of public benefit through procurement.

Suppliers are expected to support these aims by:

- Enabling SME participation: Suppliers should take reasonable steps to support the inclusion of Small and Medium Enterprises (SMEs), Voluntary, Community and Social Enterprises (VCSEs), and other diverse suppliers within their own supply chains.
- Delivering social value: Suppliers must consider how their activities contribute to wider social, economic, and environmental outcomes. This includes, but is not limited to, creating local employment opportunities, supporting skills development, reducing environmental impact, and promoting equality, diversity, and inclusion.
- Contributing to public benefit: In line with the Most Advantageous Tender (MAT) approach, suppliers are expected to deliver value beyond cost, aligning with the government's strategic priorities and ensuring that social value commitments are measurable and monitored throughout the contract lifecycle.

By working with us, suppliers play a vital role in supporting innovation, strengthening communities, and delivering long-term value for the public.

### **Fraud and Failure to Prevent Fraud**

We expect all suppliers to uphold the highest standards of integrity and transparency in their business practices. In line with the Procurement Act 2023 and the Economic Crime and Corporate Transparency Act 2023, suppliers must take active steps to prevent fraud and unethical conduct within their organisations and supply chains.

Suppliers must:

- Prohibit all forms of fraud including false representation, failure to disclose information, abuse of position, false accounting, and fraudulent trading.
- Implement reasonable fraud prevention procedures, proportionate to the size and nature of their organisation, to mitigate the risk of fraud being committed by employees, agents, subsidiaries, or other associated persons acting on their behalf.
- Cooperate fully with any investigations or due diligence processes related to fraud, misconduct, or exclusion grounds under the Procurement Act 2023.
- Report any suspected fraud or unethical behaviour that may impact the delivery of public contracts or the integrity of the procurement process.

From 1 September 2025, large organisations (as defined in the legislation) may be held criminally liable under the Failure to Prevent Fraud offence if an associated person commits fraud intending to benefit the organisation or its clients, and the

organisation did not have reasonable prevention procedures in place.

Suppliers are encouraged to adopt the six principles outlined in government guidance:

1. Top-level commitment
2. Risk assessment
3. Proportionate procedures
4. Due diligence
5. Communication and training
6. Monitoring and review

Failure to meet these expectations may result in exclusion from procurement processes, termination of contracts, or referral to relevant authorities.

### **Compliance**

The overall objective of this Supplier Code of Conduct is to drive improved performance throughout OS supply chains, by building trusting and open relationships with our supply base. Suppliers who provide goods and services to, or on behalf of OS, are expected to comply with all aspects of this code. If non-compliance is reported or alleged, the first step will be for OS to discuss it with the supplier. If that does not result in a return to compliance, we will reserve the right to review the contractual arrangement and, in severe breaches, may terminate the contract and the relationship with the supplier.

# Change History

**Table 1: Change history**

Issue	Date	Description	Reviewed By	Approved By
1.0	Aug 2024	First definitive version	Head of Procurement	Head of Procurement
1.1	Mar 2025	Amendment to reflect PA23 and Armed Forces Covenant	Head of Procurement	Head of Procurement
1.2	Oct 2025	Updated to include sections on SMEs and fraud prevention	Procurement Coordinator	Head of Procurement
1.3	Jan 2026	Updated to new format. Change to environmental legislation reference	Procurement Coordinator	Procurement Coordinator

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