

Supplier Code of Conduct



1. Introduction

The Township of Oro-Medonte (the “Township”) is committed to sourcing in an ethical, legally compliant, and socially responsible manner. The Township expects its suppliers to adhere to equivalent standards.

The Township’s Supplier Code of Conduct (“SCoC”) outlines the minimum standards of ethical, professional, and legal behavior expected from all suppliers, contractors, consultants, and their subcontractors who provide goods or services and will be collectively referred to as Supplier(s) hereafter. Compliance is mandatory and forms part of the contractual relationship with the organization.

2. Scope

The Township expects all its suppliers to affirm their compliance with the standards in this SCoC and ensure the standards are being upheld by any of their subcontractors.

The direct supplier’s subcontractors, manufacturers, and/or sources of goods shall comply with, at minimum, the same standards outlined stated in this SCoC and any other applicable Township policy.

3. Ethical Business Practices

Suppliers must conduct business with honesty, integrity, and professionalism.

Collusion, bid rigging, and any form of anti-competitive behavior are strictly prohibited.

Suppliers must not engage in lobbying or make public statements about Township procurement processes without prior written consent.

4. Compliance with Laws

Suppliers must comply with all applicable local, provincial, national, and international laws, including but not limited to:

- Labour standards
- Occupational health and safety legislation
- Environmental regulations
- Anti-corruption and bribery laws (e.g., Canada’s Corruption of Foreign Public Officials Act)

5. Labour Standards

Forced Labour: All work must be voluntary. Suppliers must not use forced, bonded, indentured, or prison labour.

Child Labour: Suppliers must not employ individuals under the age of 15, or below the minimum age permitted for specific industries as defined by Ontario's Occupational Health and Safety Act (OHSA), whichever is higher.

Working Hours and Compensation: Suppliers must comply with legal standards for working hours, rest periods, and overtime compensation. Wages must meet or exceed legal minimums.

Freedom of Association: Workers must be free to join organizations of their choice and bargain collectively.

6. Workplace Conduct

Harassment and Abuse: Suppliers must treat all workers with dignity and respect. Harassment, abuse, or corporal punishment is strictly prohibited. Suppliers must have policies and training in place to prevent and address such behaviour.

Discrimination: Suppliers must not discriminate based on race, gender, age, religion, disability, sexual orientation, marital or family status, political affiliation or any other protected status.

Health and Safety: Suppliers must provide a safe and healthy work environment that complies with Ontario's Occupational Health and Safety Act (OHSA) and any other applicable local, provincial, or federal regulations.

7. Environmental Responsibility

Suppliers must comply with environmental laws and strive to minimize their environmental impact. Adoption of sustainable practices and environmental policies is encouraged, in alignment with the Township's Climate Action Plan and Energy Conservation and Demand Management Plan.

8. Conflicts of Interest

Suppliers must disclose any actual, potential, or perceived conflicts of interest.

Relationships that may compromise the integrity of the procurement process must be avoided or mitigated and shall be disclosed to the Township or its agent(s).

9. Confidentiality and Privacy Compliance

Suppliers must protect all confidential and proprietary information obtained during the procurement process and must not use it for personal or competitive advantage.

Suppliers are also required to comply with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), including obligations related to the collection, use, disclosure, and safeguarding of personal information. Any breach of confidentiality or privacy may result in termination of the contract and/or legal action.

10. Gifts and Inducements

Suppliers must not offer gifts, entertainment, or other benefits to influence procurement decisions or gain improper advantage.

11. Enforcement and Consequences

Breaches of this Code may result in:

- Suspension from future procurement opportunities
- Termination of contracts
- Removal from pre-qualified supplier lists

The Township reserves the right to conduct audits of suppliers at its sole discretion. Should any deficiencies be identified, the supplier may be required to implement corrective action within 30 calendar days or less, as determined by the Township.

12. Compliance, Auditing, and Enforcement

Each supplier must comply with this Supplier Code of Conduct (SCoC) and all applicable laws in the jurisdictions where they operate. By affirming compliance with this SCoC, suppliers also confirm adherence to the core labour conventions of the International Labour Organization (ILO), as well as relevant national and local regulations.

The Township reserves the right to audit suppliers and request documentation to verify compliance with applicable laws and this SCoC. Suppliers are required to maintain current and sufficiently detailed records to demonstrate compliance. The Township may also request independent verification of compliance at the supplier's expense.

Additionally, the Township may require suppliers to disclose the locations of their factories and production facilities, including those of subcontractors. This information may be made publicly available through channels such as annual reports or website postings.

Upon receiving notice of a potential violation of this SCoC, the Township may conduct due diligence to assess and verify the concern. If a violation is confirmed, the Township may issue a written notice outlining the specific noncompliance and required corrective actions. The Township reserves the right to terminate its relationship with any supplier who:

- Fails to respond to reasonable requests to address workplace concerns;
- Is found to be noncompliant with applicable laws or this SCoC; or
- Does not submit or implement an adequate corrective action plan within thirty (30) days or less as specified, of receiving written notice.

No employee raising a complaint based on this SCoC, or based on applicable laws, shall be subject to disciplinary action or reprisal.

13. Remediation

The Township is committed to working collaboratively with its suppliers to improve performance where necessary. Suppliers are expected to:

- Establish and maintain procedures that allow workers to confidentially, anonymously, and/or directly report noncompliance and workplace grievances without fear of reprisal or retaliation. Suppliers must respond promptly and appropriately to such concerns.
- Upon receiving written notice of noncompliance, prepare, submit, and begin implementing a corrective action plan within thirty (30) days, subject to Section 11. This plan should aim to resolve the identified issues, mitigate any operational impacts, and address outstanding findings in cooperation with the Township.

14. Communication and Amendments

If you are aware of a violation or suspected violation of this Supplier Code of Conduct (SCoC) by a business partner or supplier, please contact the Township's Procurement Services team at procurement@oro-medonte.ca

The Township encourages its business partners and suppliers to share any actions taken to improve their business practices or enhance compliance with this SCoC. Suggestions on how the Township can strengthen the implementation of these standards are also welcomed.

The Township reserves the right to amend or modify this Supplier Code of Conduct at its discretion.

15. Accessibility Compliance

Suppliers must comply with the Accessibility for Ontarians with Disabilities Act (AODA) and any other applicable accessibility legislation.

Goods, services, and facilities provided to or on behalf of the Township must be accessible to persons with disabilities and meet the Township's accessibility standards.

16. Cybersecurity & Data Protection

Suppliers must implement appropriate safeguards to protect Township data, including personal and confidential information, against unauthorized access, disclosure, alteration, and destruction.

Suppliers must comply with applicable data protection laws and notify the Township immediately in the event of a data breach involving Township information.