

# Communication on Engagement (COE) with the United Nations Global Compact

March 2021 - February 2023





## **Contents:**

- 1. Statement of Continued Support by Director of LSTM**
- 2. Description of Actions**
  - 2.1. Human Rights**
  - 2.2. Labour**
  - 2.3. Environment**
    - Image 1: Energy Performance Operational Ratings**
  - 2.4. Anti-Corruption**

# 1. Statement of Continued Support by Director of LSTM

Dear stakeholders,

I am pleased to reaffirm Liverpool School of Tropical Medicine's (LSTM) support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labour, Environment and Anti-Corruption.



We look forward to continuing to support the United Nations in its efforts to create a more socially and economically inclusive global marketplace and advance the collective goals of international cooperation, peace, and development.

Kind regards,

A handwritten signature in blue ink, appearing to read 'D Lalloo', written in a cursive style.

**Professor David Lalloo MB BS MD FRCP FFTM RCPS (Glasg)**  
**Director of LSTM and Professor of Tropical Medicine**

# The Ten Principles of the UN Global Compact

## Human Rights

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights.

**Principle 2:** Make sure that they are not complicit in human rights abuses.

## Labour

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

**Principle 4:** The elimination of all forms of forced and compulsory labour

**Principle 5:** The effective abolition of child labour

**Principle 6:** The elimination of discrimination in respect of employment and occupation.

## Environment

**Principle 7:** Businesses should support a precautionary approach to environmental challenges.

**Principle 8:** Undertake initiatives to promote greater environmental responsibility.

**Principle 9:** Encourage the development and diffusion of environmentally friendly technologies.

## Anti-Corruption

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

## 2. Description of Actions

### 2.1 Human Rights

*Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and*

*Principle 2: make sure that they are not complicit in human rights abuses.*

LSTM's mission is to improve health outcomes in disadvantaged populations globally through partnership in research and education. The outputs and outcomes of our work most closely support [Article 25 of the Universal Declaration of Human Rights](#), focusing on health.

Our research portfolio is diverse, and undertaken by four departments:

- Vector Biology, focusing on the control or elimination of vector borne diseases, including malaria, dengue and sleeping sickness.
- Tropical Disease Biology, focusing on unmet global health challenges, such as, antimicrobial resistance, emerging and neglected tropical diseases and snakebite.
- Clinical Sciences, focusing on improving the management of diseases in the tropics. Key areas of research include respiratory infection, malaria epidemiology, clinical infectious disease epidemiology, child and adolescent health and evidence synthesis.
- International Public Health, International Public Health, focusing particularly on health systems research and its use in guiding policy and programming in order to strengthen health systems and improve care. The department specialises in maternal and newborn health, HIV and reproductive health, anaemia, blood transfusion and clinical laboratory systems, health systems development through human resource management and gender equality.

As an organisation, much of our learning and success has been built on strong, equitable partnerships with institutions around the globe. Our vision in the coming decade is for greater engagement with southern

partners and a strengthening of the global southern perspective on LSTM's work. Recognising the inherent power imbalances in global health continue to systematically disadvantage our partners in the global south, we are committed to a programme of learning, reflection and improvement to leverage greater fairness in the process of conducting research, and the sharing of the benefits of research. An example of this is the [consensus statement](#) on which LSTM researchers collaborated to present academic journals with a new and pragmatic approach to the problem of 'parachute research'.

LSTM has a zero-tolerance policy for staff and organisational representatives committing harm, exploitation, or abuse. As well as the UN Global Compact, we endorse and support the principles of the Universal Declaration of Human Rights, (UN, 1948), the UN Convention on the Rights of The Child, (UNICEF, 1989), the Declaration on the Elimination of Violence Against Women, (UN, 1993).

We continue to recognise our important role in safeguarding staff, students, volunteers and other representatives as well as the beneficiaries, research participants, patients and communities with whom we have direct and indirect contact through our work. Safeguarding training is included in our corporate induction and all colleagues are required to complete our online safeguarding course as well as sign our code of conduct.

LSTM's Research Ethics Committee (REC) review process also serves to actively promote LSTM's safeguarding policy to protect both participants and researchers. The REC reviews all studies which involve human participants to promote the highest standards of ethical practice within our research teams. REC members are guided by established ethical research principles of autonomy, beneficence, non-maleficence and justice, as well as awareness of LSTM's role as an actor in Global Health. REC members are made up of LSTM staff members from a range of scientific and medical backgrounds, as well as lay members from outside LSTM. Members carefully consider how participation might affect individual participants and their wider community, aiming to protect the participants from possible harm or danger and to preserve their rights.

LSTM aims to instill an open culture of speaking up about concerns in order to improve the safety, security and wellbeing of our research participants, patients and other people who come into contact with us, as well as that of

our staff, students and other representatives. To this end we have developed a concern reporting system, known as “Freedom to Speak Up”, and actively encourage staff, students and other representatives to report any issues of concern so that they can be investigated and dealt with quickly and appropriately. Engendering a positive speak up culture allows us to identify and improve our understanding of our risk environment and take appropriate action. The portal is hosted externally to ensure the complete confidentiality of its users. The signposted categories of areas of concern are as follows:

- Safeguarding
- Health & Safety
- Staff conduct, behaviour and wellbeing
- Student conduct, behaviour and wellbeing
- Data Protection Concerns
- Research Integrity

LSTM are signatories to the UKRIO concordat on Research Integrity and have developed a Research Integrity Statement which sets out LSTM’s expectations, and the resources available to help research comply with these requirements.

In 2021, LSTM established an internal Race Equality Advisory Panel to better understand the racial inequalities experienced by our Black, Asian and Ethnic Minority colleagues. The panel commissioned an independent report comprising an extensive and independent review of race equity within LSTM, with an aim of making LSTM an inclusive institution where all people are valued equally and have equal opportunities. LSTM’s Management Committee and Board of Trustees accepted the findings of the review in full and Senior Management are leading on implementing the recommendations of the report via an institutional Race Equity Action Plan. LSTM has also appointed a Race Equity Manager and a senior member of staff to chair the Race Equity Action Group to create a solid foundation to progress this important work, including significant changes in culture, practice, and process in the coming years.

## 2.2 Labour

***Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.***

***Principle 4: the elimination of all forms of forced and compulsory labour.***

***Principle 5: the effective abolition of child labour; and***

***Principle 6: the elimination of discrimination in respect of employment and occupation.***

LSTM is committed to being an employer of choice, with an organisational culture which welcomes all, respects, and values differences and ensures that everyone can fully participate in employment, research and study.

We recognise our obligation to prevent slavery and human trafficking and are committed to endeavouring to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our latest Modern Slavery Statement can be found on our webpages - <https://www.lstmed.ac.uk/modern-slavery-statement> LSTM strives to work with suppliers or supplier's sub-contractors (the supplier) who treat their workers with dignity and respect, adhere to applicable laws and regulations, and make their products or provide services or works in an environmentally sustainable manner. It is LSTM's policy to request our suppliers to respect the principles of our [Supplier Code of Conduct](#) and adopt practices which comply with it.

LSTM has a Strategic Safeguarding Oversight Committee (SSOC) in place which meets bi-monthly to monitor the organisation's progress against our organisational safeguarding action plan which consists of four workstreams: Reporting; People and Training; Policy and Practice; and Risk identification. The Managing Director of the Well-Travelled Clinics (WTC) is LSTM's Designated Safeguarding Lead (DSL). This role works alongside the Global HR Director, Safeguarding Leads in HR and Education, and crucially our Safeguarding Leads at international academic partner organisations.

In 2022, seven in-person 'safeguarding in research' workshops were held in Liverpool and 110 research staff have attended this course to date. The DSL together with our Safeguarding Officer for the Malawi-Liverpool-Wellcome Programme, delivered a series of five half-day workshops in Kenya in June 2022, with 132 participants across 14 different LSTM programmes. We also trained staff from KEMRI (Kisumu), KEMRI (Nairobi), LSTM Nairobi, Centre for



Disease Prevention and Control and the local Ministry of Health.

In 2021-2022 there were fewer than five reported cases of bullying, harassment, or discrimination. Due to small numbers and to maintain anonymity, no further information can be provided. LSTM has a zero-tolerance approach and will take appropriate action in all reported cases of bullying, harassment, and discrimination. We do not assume that the low number of reported cases of bullying, harassment or discrimination is a sign that there have been no incidents. With Professor Arday's Race Review highlighting a clear need to rebuild trust and create a climate which encourages reporting and culture of psychological safety.

To do so we are committed to do so we are reviewing our Freedom to Speak Up (FTSU), Bullying and Harassment reporting mechanisms - seeking external consultancy to ensure the processes are robust and complainant focused. We plan to train and appoint Dignity and Respect Champions, seeking expressions of interest from those passionate about inclusion and with lived experience where possible. We are eager to provide minimum 3 pathways to seek support and flag bullying, harassment, and discrimination. These include FTSU reporting mechanisms, traditional HR/Line Managers and Dignity and Respect Champions. The process of review will also include publishing briefings and guidance for staff on how to report, including use of anonymous 'Freedom to Speak Up' platform and providing training for Managers on their responsibility to build an inclusive culture within their teams.

2023 marks LSTM's 125<sup>th</sup> year anniversary, which provides us with an opportunity to work together to build a future that has equity at its heart for us all. We are committed to being an employer of choice, and through our Equity, Diversity, and Inclusion (ED&I) initiatives and continued effort to drive an inclusive HR service, endeavour to create workplaces where our staff and students feel valued, safe and can thrive working and studying. As an organisation we have been on a learning journey, challenging and further developing our understanding of ED&I and the barriers that people from minoritised backgrounds face. Only when we understand our own privilege can we truly become an inclusive organisation, embedding equity in all that we do. From 2021 - 2022 we have committed additional resource to support our inclusion agenda and reset our institutional focus in terms of ED&I priorities and needs. Following our Race Review published in February 2022 by Professor Jason Arday, we have committed to our first institutional

[Race Equity Action Plan](#), which provides us with a blueprint to tackle racial discrimination, bias and inequity in our processes, practice, and culture. We have also made major progress in our Gender Equity efforts, achieving a [Silver Athena Swan award](#).

To embed equity and eliminate discrimination in all that we do, we have committed to an internal Equity and Inclusion Plan 2022 - 2023. This will focus our efforts and enable us to create clear baselines, benchmarks and KPIs to monitor progress year on year - this process will include improving our data capture. Our Equity and Inclusion Action Plan will be driven forward in collaboration with our relevant Staff Networks, via our ED&I Governance structure.

The Equity and Inclusion Committee (EIC) has oversight for all LSTM's ED&I related policies, whilst maintaining oversight of LSTM's ED&I efforts. It provides an escalation pathway for networks and action groups if needed. EIC meets every two months, chaired by the Director of LSTM and the Global HR Director. EIC membership is diverse, with representation from functions and departments across LSTM (both locally and internationally). As part of our efforts to strengthen policies, we have embedded Equality Impact Assessments (EIA) into the policy development process. Recently, we updated our entire Policy Management Framework embedding ED&I, EIA, and consultation - with policies to be reviewed at least every three years by the policy owner.

We are fully committed to developing equitable pathways to career progression and training for our people, so that we can attract and retain the very best academic, scientists, and professional services staff. In education, we are committed to increasing our portfolio and growing and diversifying our student base so that we can continue to play a vital role in educating the global health leaders of the future. In addition to investing in staff, we have also made substantial investment in our facilities our education and research portfolios. Whilst our international reach and longstanding partnership provide us with a fantastic opportunity to work collaboratively and learn from our partners to develop equitable relationships, free from discrimination, that support the delivery of our mission to 'create healthy lives across the world'.

LSTM signed the Researcher Development Concordat in July 2020 as part of multiple initiatives adopted to improve our research culture. The original

institutional action plan was approved by Senior Leadership Team in May 2021 and refreshed in June 2022. Progress has been made around communicating the actions taken and future priorities for research culture, defining and clarifying the roles of Research Group Leaders, and ensuring that the wider contributions of researchers to the full ecosystems are accurately recorded and appropriately rewarded. We are signatories to Technicians Make It Happen and support the development and progression of our colleagues in technician roles.

As signatories to the Declaration on Research Assessment (DORA) we have been continuing to take steps to ensure that we are assessing research quality, and not quantity, and to guarantee that ‘knowledge exchange’ activities, that are so important in ensuring that our research is widely disseminated and used to improve health outcomes, are supported and fairly recognised. Examples have included:

- extending our Reading Panels to evaluate paper quality and ensuring that this information is available for candidates and promotion panels.
- expanding the range of training opportunities for staff and students in research uptake, commercialisation, equitable partnership, and dissemination to diverse communities.
- developing an activities dashboard so that contributions to LSTM committees and teaching are visible.
- updating promotion procedures to ensure that knowledge exchange activities are rewarded.

A refreshed Vision, Mission, and Values were adopted at our staff conference in April 2022. These were developed following extensive staff consultation and define behaviours that we expect to see embedded in all that we do. In 2023 we will be launching a Staff Awards process to recognise positive examples of staff living these values across the organisation.

Research culture and integrity are intrinsically linked; mistakes are more likely to happen in highly competitive environments where researchers feel pressurised to deliver. It is important for researchers to know where to go to for support if they have concerns over questionable research practice. We have refreshed our Research Integrity and Governance Committee, which provides support and oversight in this area and reviewed and updated relevant processes and training material. The role of our Research Integrity

and Governance Committee is to provide strategic oversight and monitoring of research governance and integrity processes at LSTM, to ensure we continually improve and monitor our research quality. In 2023 we plan to establish departmental research integrity champions to encourage further dialogue and help signify the importance LSTM places on rigour in all aspects of the research eco-system.

Colleagues at LSTM are free to join a trade union and may be accompanied to formal HR meetings by a trade union representative. Our colleagues are involved in a range of different unions and professional bodies. LSTM participates in a national collective bargaining exercise relating to staff pay and conditions. In addition, we involve our colleagues directly in decision making across LSTM through formal committees and working groups; there is also staff representation on our leadership team.

## 2.3 Environment

*Principle 7: Businesses should support a precautionary approach to environmental challenges.*

*Principle 8: undertake initiatives to promote greater environmental responsibility; and*

*Principle 9: encourage the development and diffusion of environmentally friendly technologies.*

The LSTM Group is fully committed to operating in an environmentally friendly and sustainable manner. To support our commitment, a new Environmental Policy was introduced in 2019 and all refurbishment projects now incorporate environmental and/or energy improvements whenever practicable, such as replacement windows, improved roof insulation, LED lighting or improved BMS controls. This will also include the aspiration to achieve a BREEAM Very Good rating on significant projects where it is economically feasible to do so.

Our most recent project, Pembroke House, has been equipped with a photo voltaic system which is estimated to generate 21,353kwh per year, providing circa 9% of energy usage of the building .

The Building Management Systems (BMS) manages and monitors building services and will:

- ensure that an optimal level of efficiency and comfort is achieved by continuously maintaining the correct balance between operating requirements, external and internal environmental conditions and energy usage.
- facilitate the link to our metering systems to measure utility consumption to identify usage patterns, manage these against expected or desired levels and then assist in being able to adjust, control and ensure efficiency in our utility consumption.

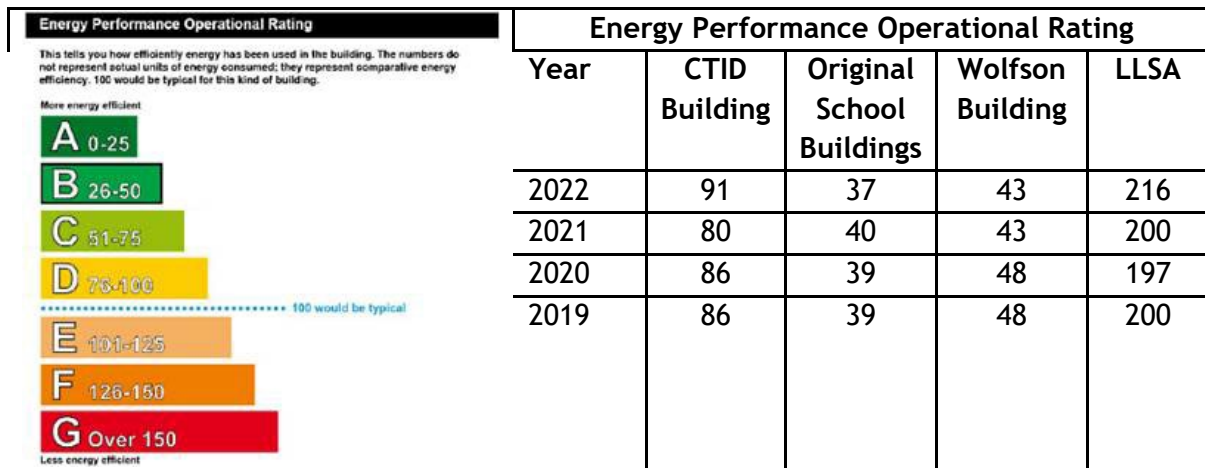
Our Investment Policy takes a socially responsible and ethical approach to all investments. The policy states that our Fund Managers should not knowingly engage with organisations associated with armaments to the military, that contravene human rights, engage in workforce exploitation, discrimination or other conduct that is prohibited under the Equality Act 2010, or are involved in the manufacture or sale of tobacco products or fossil fuels. LSTM completely divested from fossil fuels companies during 2020.

The Estates Team undertakes regular and routine servicing to all its plant and equipment to ensure that it operates efficiently and effectively.

As can be seen from the Display Energy Certificates below, we are reducing our energy performance operational ratings in our original school buildings, our oldest and least energy & thermally efficient facilities, as a result of introducing the above improvements. The increase in relation to the LLSA building, results from increased occupancy and additional research/laboratory activities being undertaken in this facility.

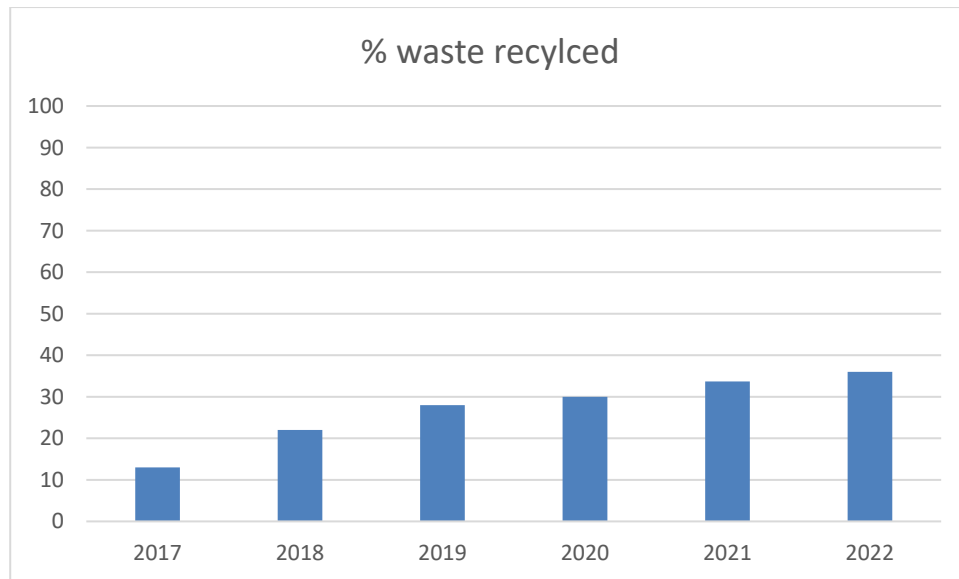
### Image 1: Energy Performance Operational Ratings

The score represents comparative energy efficiency, the lower the score, the more efficient the building is.



As from October 2020, all LSTM buildings are now supplied with 100% certifiable clean renewable electricity.

- LSTM recycles at source, and the following demonstrates our continuous improvement in this area including introduction of dry mixed recycling for all waste.



We are increasingly choosing to reduce the print runs of our key corporate publications to further encourage growing downloads of digital versions. For example, the print run of our Annual Report has been reduced from 2,250 in 2018 to 500 in 2022/23.

In 2021 a new Sustainability and Environmental Committee (SEC) was established to provide strategic direction, coordination and guidance to LSTM for the integration of sustainability principles and practices throughout core teaching, research and operational activities.

Actions taken to date include:

- A switch from using brown energy to using certifiable green electric energy that is audited through the Carbon Trust.
- Development of Green Labs Guide
- A change in temperature of the majority of our laboratory Freezers from -80 to -70
- Carbon literacy training
- External audits of our waste management to introduce further efficiencies
- A commitment to vegetarian catering for LSTM events
- Carbon literacy training

The EWG & SEC works to enhance the LSTM Group's contribution to improving sustainable value. The EWG group is divided into 5 subgroups,

each focusing on a particular area of priority. The 5 subgroups are:

- Carbon and Travel; an employee survey has been carried out with a view to developing an action plan. This group has a cycling to work subgroup and LSTM provides facilities for colleagues who commute by bike, as well as a cycle to work scheme.
- Data Collection; currently assessing the impact of remote working on the group's environmental footprint.
- Communication and Engagement; working with the Carbon group on communicating the survey findings and converting the results into agreed actions.
- Green Working: the development of a "Green Labs" guide to deliver improvements in environmental working practices
- Strategy: long-term planning activities revisited to deliver enhanced sustainability.

SEC have also been working hard in several areas and have developed an action plan which has priorities and targets which is routinely monitored by the Committee and reported through to Senior Management. Below is a summary of the key activities undertaken in 2021/22.

### **Raising awareness**

- a carbon literacy project has been established and training has been rolled out across the
- organisation.
- A climate change module has been developed and offered as a short course.
- A member of the Board of Trustees has been appointed to the Sustainability and Environmental Committee.

### **Improving Data Collection and Analysis**

- An external audit of our waste streams and our recycling has been undertaken.
- a travel survey has been carried out.
- sustainability, including social, economic, and environmental issues is now included as an agenda item for all contract reviews.



## Green Initiatives

- The organisations international travel policy is being reviewed and updated.
- SEC are reviewing options for carbon offsetting linked to support for communities who LSTM work collaboratively with

LSTM also works with local suppliers to ensure value is delivered to the local community whilst adhering to environmental standards. An example of this is working with a local taxi company that is using a carbon offsetting company to improve environmental performance. Our preferred suppliers adhere to the relevant required environmental standards and are asked to explain how they do this in their tender documents. Further information on our procurement processes is available in [section 2.4](#) of this document.

## 2.4 Anti-Corruption

***Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.***

The LSTM Group is committed to the highest standards of ethical conduct and integrity throughout its activities in the UK and overseas. LSTM has clear statements of intent showing that it does not tolerate any form of fraud, bribery, corruption or dishonesty by its employees, agents or consultants, or by any person or body acting on its behalf.

To underpin the governance of this ethos, LSTM has in place institutional policies which are reviewed and reaffirmed each year. These policies clearly layout the organisation's statement position, explains how to recognise potential instances of fraud, bribery and corruption and what actions are needed if it is experienced. The policies are explicit in explaining that the consequences of becoming involved in such acts will constitute a serious disciplinary matter for the individual concerned and it may cause reputational damage to the organisation. LSTM reserves the right to refer alleged instances to the relevant employee disciplinary process and the police authorities.

The LSTM Fraud, Bribery, Corruption Policy also details broader areas of corruption such as money laundering, tax evasion, terrorism financing and aid diversion to ensure that the reader understands the wider implications of how corruption can potentially infiltrate business activities at all levels. LSTM staff work in locations all over the world and this isolation away from the main campus therefore could place them at greater risk of being exposed to corruption and unethical conduct, so the policy further explains and details the recognition of facilitation payments, gifts, cash payments etc. Examples are given to help raise awareness such as: unusual payments to third parties, unsubstantiated expenses, lack of invoice documentation so that individuals are fully aware and can recognise potential corruption activity.

LSTM also has established practices on the recognition and management of conflict of interest. Our policy is reviewed and reaffirmed each year, the reminder for staff to declare a potential conflict is a standard item on meeting agendas and all staff and board members must complete a return of their declaration each year. The Conflict-of-Interest Policy also covers the

procurement activity with each supplier being required to declare a conflict as and when it arises.

Whistleblowing systems are set up and monitored closely, with policies detailing how to report an incident. The system ensures that the reporter can remain anonymous, if they wish to do so, to encourage the reporting of incidents and the system is clearly labelled on the LSTM internet and intranet and widely publicised at regular intervals.

LSTM undertakes a rigorous due diligence on our partners and subcontractors and part of this assessment is to review the organisation's approach to corruption. We will work with our partners to ensure that they have satisfactory policies, processes and procedures in place.

### **Freedom to Speak Up**

Whilst anti-corruption is not specifically signposted through our Freedom to Speak Up system (see [section 2.1](#)), being covered by the separate Whistleblowing policy, this tool is another secure avenue for LSTM staff, students and other representatives to raise concerns through this platform and there are robust referral mechanisms to ensure that concerns are dealt with by the appropriate specialist teams.

### **Procurement**

LSTM's policies and procedures are designed to mitigate against the inherent risk of corrupt procurement activity.

The purchase value used to determine the procurement route is calculated by aggregating the forecast contract expenditure over a two-year period, or the period covered by the contract if earlier:

- For procurements in the lowest category of purchase value, the buyer has discretion to decide whether to obtain written quotations, although value for money must always be secured.
- For procurements in the middle category of purchase value, a minimum number of written quotations must be obtained and the reasoning supporting the ultimate selection decision retained.
- For procurements in the highest category of purchase value, a full tender in accordance with LSTM tendering procedures and, where applicable, the Public Contract Regulations 2015 must be undertaken.

The procurement thresholds are set by LSTM and tailored to individual group entities to ensure that the purchase value hierarchy is in line with local

materiality and regional economic conditions. Under exceptional circumstances, deviations from LSTM's policies and procedures are permitted on submission and acceptance of a written justification paper and subject to approval by Senior Management.

LSTM fosters a culture of procurement compliance through its dedicated procurement team and the development of user-friendly tools to support the procurement processes. LSTM uses an integrated e-procurement platform that guides buyers through the complete procurement process. The system has in-built surveillance functionality and preventative controls that trigger online approval steps in line with the procurement framework. On completion of a purchase order confirmation, the e-procurement system automatically issues an order confirmation accompanied by LSTM's terms and conditions which include anti-corruption provisions in line with LSTM's Fraud, Bribery, Corruption policy.

The e-procurement platform gives users access to latest price lists from LSTM's contracted suppliers. LSTM also leverages the collective bargaining power afforded through access to the North West Universities purchasing consortia frameworks.

Tendering exercises are conducted electronically with all document exchanges taking place on the LSTM eTendering portal.

The terms and conditions of LSTM's standard contract for the engagement of consultants is updated in line with LSTM's Fraud, Bribery, Corruption policy.

### **LSTM Supplier Code of Conduct**

The LSTM group requires approved suppliers to sign up to its Supplier Code of Conduct which covers the following areas: -

- Employment Practices
- Environmental
- Health and Safety
- Ethics and Integrity

The Ethics and Integrity section contains the following anti-corruption provisions:

- The supplier must not offer or give, any gift or consideration of any kind as an inducement or reward for doing or refraining from doing or

for having done or refrained from doing, any act in relation to the obtaining of any contract with LSTM, or for showing or refraining from showing favour or disfavour to any person in relation to the Contract or any such other.

- The supplier must comply with all anti-bribery and anti-corruption laws applicable to our business, including the Bribery Act 2010 and the Prevention of Corruption Act 1889 to 1916.

LSTM's Supplier Code of Conduct was published in 2015 and became a prerequisite during 2019 for new purchase orders placed with suppliers. LSTM's e-procurement platform has enabled a more integrated approach to ensuring that LSTM Suppliers are in receipt of LSTM's up-to-date terms and conditions package with each new order confirmation.

The Supplier Code of Conduct is also published on LSTM's external website. LSTM reserves the right to request details of how suppliers comply with the Code and expects its suppliers to apply the principles of the Code throughout its supply chains.