



**American  
Red Cross**

# Supplier Code of Conduct



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# Introduction and Applicability

The American Red Cross (the “Red Cross”) is an internationally renowned humanitarian organization committed to preventing and alleviating human suffering in the face of emergencies. Guided by our vision to inspire and mobilize the power of volunteers and generosity of donors, we aim to build a resilient and compassionate world for all.

## Mission and Values of the Red Cross

Our work is founded on the mission and values of the Red Cross and guided by the Fundamental Principles of the Red Cross Network which are Humanity, Impartiality, Neutrality, Independence, Voluntary Service, Unity and Universality ([Red Cross Mission & Values](#)). These principles ensure that our efforts remain focused on the needs of those we serve, without prejudice or external influence. We expect our suppliers to align their business practices with our values and principles, ensuring that their operations do not conflict with or compromise these core guiding concepts. Suppliers are further expected to respect and comply with these values and principles throughout their supply chains, ensuring that their supply chains adhere to the same ethical standards and commitment to our core values.

## Purpose and Importance of the Supplier Code of Conduct

The Red Cross Supplier Code of Conduct (the “Code”) embodies our shared commitment to ethical conduct, integrity and accountability. It plays a vital role in building trust-based relationships that create shared value, promote responsible and sustainable management of the Red Cross supply chain, ensure compliance with all relevant laws and regulations and support the advancement of our mission.



# 1. Ethics and Compliance

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Suppliers of all goods and services to the Red Cross are expected to conduct business in accordance with the highest ethical standards and in full compliance with all applicable laws and regulations.

## **Bribery and Corruption**

Suppliers must comply with all applicable anti-corruption laws, including the United States Foreign Corrupt Practices Act, and all other applicable laws that prohibit corruption, extortion, kickbacks, or bribery. Suppliers must not pay or receive bribes or provide any other improper benefits to any person in order to obtain or retain business or secure a business advantage, promise or offer. Supplier books and records must be maintained to accurately reflect the true nature of transactions.

## **Conflicts of Interest**

Suppliers must avoid engaging in any activity that would create an actual or potential conflict of interest regarding their provision of products or services to the Red Cross. A conflict of interest occurs when the interest of a Supplier or its employees or suppliers with whom a Supplier works when providing goods or services to the Red Cross, interferes or appears to interfere with the Supplier's ability to deliver or perform services to or for the Red Cross objectively.



## 2. Labor Practices and Responsible Sourcing

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The Red Cross is committed to respecting the human rights of all workers and expects suppliers to do the same. This includes paid staff, volunteers, interns, contractors and others. Suppliers must adhere to all applicable laws and regulations and ensure a respectful and safe workplace free from violence, threats, or retaliation. Supplier practices must align with the standards outlined in the Code.

### **Non-discrimination**

The Red Cross expects its suppliers to maintain workplaces free from discrimination, harassment and retaliation based on factors including, but not limited to, age, disability, ethnicity, gender, gender identity, gender expression, nationality, ancestry, race, color, sexual orientation, physical disability, mental disability, genetic information or condition, marital status or parental status, pregnancy, religion, union affiliation, citizenship status, military status or veteran status. Suppliers must comply with all applicable laws and regulations related to non-discrimination in hiring and employment practices.

### **Employment Laws**

Suppliers are expected to adhere to applicable employment, wage and labor laws and regulations and to ensure employees receive accurate and timely wage statements with sufficient detail to verify their compensation. All use of temporary, dispatch, or outsourced labor must comply with applicable legal requirements.

### **Child Labor**

The Red Cross does not tolerate child labor in any form. Suppliers are required to comply with applicable child labor laws and employ only workers who meet the minimum legal age requirement in their countries of operation.

### **Forced Labor**

The Red Cross requires its suppliers to comply with all applicable laws pertaining to slavery, forced labor and human trafficking. Red Cross expects contracted suppliers to enact practices to ensure compliance with legal prohibitions against importing goods that were mined, produced, or manufactured wholly or in part with forced labor.

### **Responsible Sourcing Practices**

In alignment with the Red Cross mission and values, we expect our suppliers to demonstrate the same commitment in how they manage and engage their own supply chains. Suppliers are expected to adopt practices that strengthen and expand relationships with a diverse range of subcontractors and suppliers — of all sizes, backgrounds, capabilities and geographic localities — to foster competition and efficiency, drive innovation, enhance agility and promote community engagement, partnership and resilience.

We encourage our suppliers to engage their supply base proactively, providing equitable opportunities for qualified companies to participate in their sourcing processes. Supplier selection decisions should consider total value, including life-cycle cost, quality, reliability, efficiency, innovation, partnership and alignment with ethical business standards.

Suppliers are expected to maintain honest, ethical and respectful relationships within their supply base and to collaborate with the Red Cross to advance shared goals of integrity, inclusion and positive community impact.



### 3. Respect for and Protection of Red Cross Assets

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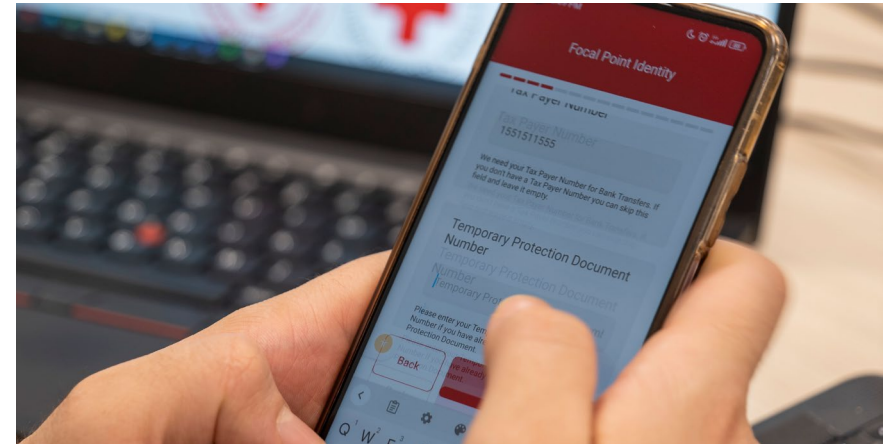
Suppliers are required to safeguard all resources entrusted to them, ensuring these assets are used responsibly, securely and in alignment with contract terms and applicable laws and regulations. Red Cross resources encompass a wide range of assets, including but not limited to facilities, equipment, systems, technology, intellectual property, confidential information and data (financial, supplier, employee, volunteer, etc.), as well as materials, time and supplies. Protecting these resources requires adherence to policies, procedures and best practices designed to prevent misuse, unauthorized access or disclosure. Below are the key categories outlining these expectations:

#### Physical Assets

Suppliers are responsible for the secure use and maintenance of all Red Cross physical assets, including facilities, equipment and supplies. These assets must only be used for authorized purposes and handled in a manner that prevents damage, loss or theft. Suppliers must also comply with physical security measures, such as access controls, badging policies and other Red Cross requirements.

#### Confidential and Intellectual Property

Suppliers may not use American Red Cross trademarks or intellectual property without explicit written authorization. When authorized, suppliers must responsibly protect and use these assets in compliance with licenses and terms of use. Suppliers are also required to safeguard the confidentiality of Red Cross proprietary information, including but not limited to trade secrets, patents, copyrights and sensitive data related to donors, clients, volunteers and employees. Suppliers are prohibited from using, disclosing or distributing this information without authorization and must adhere to all safeguarding protocols.



#### Data Privacy

Suppliers must access, use and transmit Red Cross data, including financial, supplier, employee and personally identifiable information - only as permitted under contract terms and in compliance with applicable data privacy laws and regulations. Suppliers are responsible for any unauthorized use or disclosure of this data by their employees, agents or representatives and must report any breaches promptly.

#### Cybersecurity

Suppliers are required to implement robust cybersecurity systems to protect their own networks and information as well as to prevent unauthorized access to Red Cross systems and data. These systems should include processes and technologies designed to mitigate cyber risks and safeguard against incidents such as data breaches or system compromises. Suppliers must maintain and update their security measures regularly to ensure compliance with Red Cross standards and contractual obligations.

## 4. Environmental Practices

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Suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible and to promote reuse and recycling programs.

### Environmental Compliance

The Red Cross requires suppliers to comply with all laws, regulations, ordinances, rules, permits, licenses and approvals regarding the environment in their countries of operation.

### Hazardous Waste and Emissions

Suppliers shall properly manage and treat any hazardous waste, wastewater or air emissions with the potential to adversely impact human or environmental health, prior to release and in accordance with applicable laws and regulations.

### Management of Environmental Impact

Suppliers shall manage compliance, minimize environmental impact and drive continual improvement through the implementation of a comprehensive environmental management system. At a minimum, suppliers are expected to have policies, plans or strategies in place specific to reducing carbon emissions, water consumption, reducing waste material and packaging while prioritizing renewable energy resources, energy-efficient equipment and buildings and low-emission transportation.

### Sourcing Sustainable Materials

The Red Cross aims to purchase products and services that minimize environmental impact and promote human health, while also considering cost-effectiveness. Suppliers are encouraged to propose environmentally friendly alternatives that incorporate sustainable materials, minimize packaging, lower CO2 emissions or are more biodegradable.



## 5. Health and Safety

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### Compliance and Management Systems

Suppliers are responsible for complying with all local health and safety laws and regulations, and adopting practices to minimize risks, prevent accidents and maintain safe and sanitary workplaces. This includes obtaining and keeping current all necessary permits, and implementing and maintaining a comprehensive health and safety management system including policies and processes to address the following areas.

### Policies and Training

Suppliers are responsible for setting policies and objectives for health and safety, appointing a qualified person responsible for these areas and ensuring regular assessment and mitigation of workplace hazards. Workers should receive appropriate health and safety training in their primary language and have access to health and safety information at their workstations. Suppliers should provide necessary personal protective equipment at no cost to employees.

### Incident and Emergency Management

Suppliers are responsible to have processes in place to record and investigate accidents, near misses and first-aid events, including conducting root cause analyses and implementing corrective actions. Emergency response plans should be established, including training for workers on emergency procedures, alarm systems, evacuation plans and first-aid provisions. Workers should be able to report hazards and unsafe conditions without fear of retaliation.

### Facilities and Living Conditions

Suppliers are responsible for providing clean and accessible toilet facilities, potable water and sanitary dining and food preparation areas. Worker dormitories, if provided, should be clean, safe and offer reasonable living space.





# Management System

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Suppliers must establish and maintain a management system to ensure compliance with applicable laws, regulations and Red Cross requirements, while managing risks and fostering continuous improvement. This system should include executive accountability, compliance monitoring, risk management, training and a grievance reporting program allowing anonymous, retaliation-free reporting, where permitted by law. Suppliers must also have policies guiding employees and contractors to report workplace concerns and ensuring protection for those making good-faith reports.

## Reporting Concerns and Raising Questions

Suppliers must promptly report to Red Cross concerns and suspected or actual violations of this Code. Suppliers may do so by contacting the Red Cross Concern Connection Line at 888-309-9679 or [redcross.ethicspoint.com](https://redcross.ethicspoint.com). Such reporting may be made anonymously, where permitted by law. Suppliers must provide reasonable assistance with any Red Cross investigation of a Supplier's suspected or actual violation of this Code. Suppliers must protect anyone who works for them, either as an employee or a contractor, from any form of retaliation for reporting suspected or actual violations of this Code.

For questions or other inquiries regarding this Supplier Code of Conduct, please contact the Red Cross at [SupplyManagement@redcross.org](mailto:SupplyManagement@redcross.org).

## Red Cross Rights to Review and Enforce the Code

The Red Cross expects its suppliers to fully cooperate with Red Cross efforts to monitor and evaluate compliance with the Code, including onsite auditing, requesting written policies, procedures and evidence of implementation. In the event a supplier violates the Code,

Red Cross has the option to offer the supplier the opportunity to communicate corrective actions. Violations of this Code may give rise to breaches of the supplier's contractual obligations with the Red Cross and may result in the Red Cross executing its rights of termination, as detailed in the supplier's contract. Red Cross may consider a supplier's compliance with this Code and willingness to provide requested documentation during sourcing processes.





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