

Our Ethical Procurement Policy demonstrates our commitment to reducing the ethical, social and environmental impacts on our supply chain.

When purchasing goods and services, we are fully committed to minimising the negative impacts on the environment and society, whilst maintaining our business requirements.

We seek to do this through combining social, environmental and ethical considerations into all purchasing decisions which are applicable to both our suppliers and ourselves.

This policy will ensure that we and our suppliers behave in a responsible manner.

Where a supplier's behaviour does not meet with our Ethical Procurement Policy, we will open discussions with that supplier and encourage continuous improvements with their performance focusing on ethical, social and environmental aspects.

In support of the Policy, we will ensure:

- i. Responsibility for the consistent implementation the Policy and its Principles is overseen by the Senior Management team.
- ii. Funding is available for the implementation and continual improvement of the Policy.

To implement the Policy, we will:

- ✓ Ensure all employees are aware of the requirements of the policy.
- ✓ Work closely with our suppliers to continually review our ethical, social and environmental standards, with the aim to make improvements in all three areas.
 - ✓ Seek to apply commercial influence where we are confident improvements can be made.
 - ✓ Apply confidentiality at all time, with all information supplied to us.
- ✓ Ensure all members of the Suppliers employees are treated with the same respect for diversity and workplace safety as our own employees.
- ✓ Base supplier selection on objective and transparent criteria, considering ethical, social and environmental performance.
 - ✓ Promote responsible supply chain practices within our industry.
 - ✓ Promote the use of local suppliers.
 - ✓ Support fair and timely payment charters.

This Ethical Procurement Policy is based on the following core principles:

Ethics

Our ethical standards and arrangements ensure they promote and encourage compliance and these are also expected of our suppliers.

Our suppliers must have systems and procedures in place to demonstrate prevention of:

- Conflicts of interest
- Money laundering
- Fraud, Bribery and Corruption and any other improper payments or gifts
 - Unauthorised access to personal and business information
 - Insider Trading
 - Modern Day Slavery
- Exploitation of temporary workers

Society

We seek to ensure that the working conditions of our suppliers meet the International Labour Organisation (ILO) and the Universal Declaration of Human Rights (UDHR).

This requires suppliers to demonstrate the following standards:

Health, Safety and Hygiene: Any employee has the right to expect to work in an environment that is safe and healthy. Appropriate steps should be taken to prevent accidents occurring in their normal course of work and receive relevant health and safety training. Access to clean water and toilet facilities as required.

Discipline: Physical abuse or discipline, threats of sexual, physical or other types of verbal abuse, harassment or forms of intimidation are not acceptable. Disciplinary and grievance procedures shall be clearly documented and communicated to all employees.

Forced Labour: There shall be no forced, bonded or involuntary labour. No workers will be required to lodge 'deposits' or 'identity papers' with ISS Labour and are able to leave after giving reasonable notice.

Child labour: We ensure the effective long-term elimination of child labour, in a manner consistent with the interests of the children concerned.

Working Hours: Working hours shall not be excessive and shall comply with our Management of Fatigue Policy. Overtime should be voluntary.

Equality of Treatment: We seek to eliminate discrimination in access to employment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability or social origin and promote equality and treatment.

Remuneration: Wages and benefits afforded to all workers should meet the national standards. All workers should be provided with clear written information on their pay and conditions. Excessive deductions on wages should not be permitted as a disciplinary measure.

Employment Terms: All workers should be provided with simple, written contracts which must detail the terms and conditions of their employment. Contracts should be clearly understandable to each worker. Work performed should be on the basis of recognised employment law and practice.

Community Impact: Organisations are encouraged to support the communities in which they operate through appropriate community initiatives.

Environment

We adopt an Environmental Policy which outlines our commitment to achieving harmony between the environment and our corporate activities.

The implementation of this policy is fully supported by senior management who will use environmentally considerate methods and materials for all our procurement needs.

Communication, Monitoring and Review

We will ensure that this policy is communicated to all individuals to which it applies and is reviewed at least annually for effectiveness.



Gary Beeston
Group Managing Director