

## Sustainable & Ethical Procurement Policy

**Issue Date:** January 2026

**Review Cycle:** Annual or upon significant business change

### 1. Policy Statement

Connexion Developments Ltd is committed to conducting procurement activities in a manner that is ethical, responsible, and sustainable. We recognise that our supply chain has a direct impact on people, the environment, and wider society, and we seek to work with suppliers who share our commitment to high standards of business conduct.

Sustainable and ethical procurement is an integral part of our overall governance framework and supports our commitments to quality, environmental responsibility, human rights, and regulatory compliance.

### 2. Scope

This policy applies to:

- All procurement activities undertaken by Connexion Developments Ltd
- All suppliers, manufacturers, subcontractors, and service providers
- All goods and services purchased for use in our operations or supplied to customers

The principles set out in this policy apply across domestic and international supply chains.

### 3. Objectives

#### 3.1 Sustainable Procurement

We seek to:

- Minimise adverse environmental impacts associated with our supply chain
- Reduce resource consumption and waste where reasonably practicable
- Encourage the supply of products that meet recognised environmental and regulatory standards
- Consider product lifecycle impacts, including durability, efficiency, and end-of-life disposal

#### 3.2 Ethical Procurement

We seek to ensure that suppliers operate in a manner that respects fundamental human rights and ethical standards, including:

- Fair and lawful employment practices
- Safe and healthy working conditions
- Respect for freedom of association and collective bargaining
- Equality of opportunity and non-discrimination

### 4. Supplier Expectations and Standards

Suppliers are expected to comply with all applicable national and international laws and regulations.

Where differences exist between legal requirements and the standards set out in this policy, suppliers are expected to apply the higher standard where reasonably practicable.

Key expectations include:

#### 4.1 Employment Practices and Modern Slavery Prevention

- No use of forced, bonded, or involuntary labour
- No retention of workers' identity documents or deposits
- Workers must be free to leave employment subject to reasonable notice

#### 4.2 Elimination of Child Labour

- No use of child labour
- Young workers under the age of 18 must not be employed in hazardous conditions, at night, or without appropriate safeguards
- Where issues are identified, corrective actions must prioritise the welfare of affected children

#### 4.3 Wages, Working Hours, and Conditions

- Wages must meet or exceed applicable legal minimums
- Working hours must comply with national labour laws
- Workers must be provided with clear and transparent terms of employment

#### 4.4 Health, Safety, and Welfare

- A safe and healthy working environment must be provided
- Reasonable measures must be taken to prevent accidents and occupational illness

## 5. Environmental Responsibility in the Supply Chain

Suppliers are expected to:

- Comply with applicable environmental legislation and regulations
- Operate environmental management practices appropriate to the nature of their activities
- Identify, manage, and mitigate significant environmental risks
- Promote waste reduction, reuse, and recycling where practicable

Environmental performance forms part of supplier evaluation and ongoing review.

## 6. Procurement Process and Due Diligence

Sustainability and ethics are considered throughout the procurement process, including:

- Supplier selection and evaluation
- Contractual arrangements
- Ongoing supplier monitoring and review

Connexion Developments Ltd applies a proportionate, risk-based approach to supplier due diligence, aligned with its **ISO 9001:2015 Quality Management System** and **ISO 14001:2015 Environmental Management System**.

## 7. Monitoring, Review, and Continuous Improvement

Where appropriate, performance indicators and supplier feedback are used to assess compliance with this policy.

Suppliers that do not meet required standards may be asked to agree to corrective action plans. Continued or serious breaches may result in the suspension or termination of the business relationship.

## 8. Responsibilities

### Management

Management is responsible for:

- Implementing and maintaining this policy
- Ensuring procurement activities align with its principles
- Reviewing supplier performance and risk

### Employees and Others

Employees involved in procurement activities are responsible for:

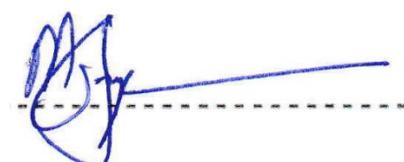
- Applying this policy in their day-to-day work
- Escalating concerns relating to supplier conduct or compliance

## 9. Policy Review

This policy is communicated internally and made available to suppliers and other interested parties as appropriate.

The policy will be reviewed annually or following significant changes to business operations, supply chain risk, or regulatory requirements.

Approved by:



Managing Director  
For and on behalf of Connexion Developments Ltd