

Sustainable & Ethical Procurement Policy

Introduction

We take social and environmental factors into consideration alongside financial factors in making decisions on the purchase of goods and the commissioning of services. Our purchasing decisions consider whole life cost and the associated risks and implications for society and the environment.

Procurement can make a significant contribution to our goals of sustainable economic development and resource minimisation by ensuring that the goods and services we buy consider optimum environmental performance.

Procurement has an additional role to play in minimising any risk of social exploitation within the supply chain. We believe that this not only makes business sense, but it also has the potential to improve the living and working standards of people around the world. This policy standard sets out the detailed requirements and minimum expectations of our policy of sustainable and ethical procurement. Specifically, it addresses the expectation that our staff and suppliers have a natural respect for our ethical standards in the context of their own culture and that relationships with our suppliers are always based on the principle of fair and honest dealings. The same principle of fair and honest dealings must be extended to all others with whom our suppliers do business, including employees, sub-contractors and other third parties and their local communities.

Objectives

Sustainable Procurement

Our sustainability objective is to ensure a continuous improvement in procurement decisions measured against delivering sustainable and ethical trading. More specifically, we seek to avoid adverse social and environmental impact in the supply-chain, the reduction of environmental impact from service operations and the purchase of products that meet recognised environmental standard.

Ethical Procurement

Our ethical objective is to ensure that people in the supply-chain are treated with respect and have rights regarding employment including the rights to freely choose employment, freedom of association, payment of a living wage, working hours that comply with national laws, equal opportunities, recognised employment relationship, freedom from intimidation and to a safe and healthy working environment.

Procurement process

We will use our purchasing power, where practicable, to influence and encourage suppliers to create a more reliable market for environmentally and ethically produced products and services.

Environmental and social factors shall be considered in the purchasing process. Specifically, this includes considering what the product is made from, the product durability, where it is made and by whom, the efficiency of the product during use and the processes involved in its production and distribution, what the disposal requirements are and if it can be reused or recycled.

We will add sustainability into the procurement cycle: identifying needs; appraising options; design and specification; supplier selection; tender evaluation; contract management and supplier development.

Sustainable development concepts will be embedded into purchasing functions through training programmes.

Monitoring and measuring

We will seek to establish key performance indicators for sustainable procurement where appropriate and monitor and measure the performance of our supply chain against them.

Where applicable, environmental law is given effect through procurement decisions including international obligations on climate change and sustainable development. We will support national policy and legislation to reduce CO2 emissions, ban ozone-depleting substances and protect biodiversity.

Ethical Procurement Standard

We expect our suppliers to comply with legal requirements and to adopt the following moral principles: –

Regulatory compliance

Suppliers shall comply with all national and other applicable law and regulations. Where the national law and this Standard are in conflict, the highest standards consistent with national law should be applied.

Where the provisions of law and this Standard are not in conflict but address the same subject, the provision, which affords the greatest protection to people and the environment, should be applied.

Employment – modern slavery

There is no forced, bonded, or involuntary prison labour. Nor do we demand deposits or hold onto our workers' identity papers, or work with businesses that do. We only work with people who chose to work freely.

Employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Elimination of child labour

The long-term elimination of child labour should take place in a manner consistent with the best interests of the children concerned.

Suppliers should develop or participate in and contribute to policies and programmes that provide for the transition of any child found to be performing child labour to enable them to attend quality education.

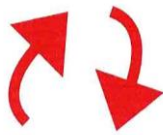
Children and young persons under 18 shall not be employed at night, in hazardous conditions or without a supervisor or guardian.

Right to a living wage

Wages paid for a standard working week meet or exceed national (or, where applicable, local) legal standards.

In any event, wages should not be paid in kind and should be enough to meet basic needs.

All workers should be provided with written and comprehensible information about their employment conditions in respect to wages before they enter employment and the particulars of their wages for each period. Deductions from wages as a disciplinary measure should not be permitted. Deductions from wages not provided for by national law should only be permitted with the expressed permission (without duress) of the worker concerned. All disciplinary measures should be recorded.



Environment – We expect our suppliers:

To have an effective environmental policy, to implement the policy at all levels throughout the company and to include a commitment to continual improvement in environmental performance and prevention of pollution.

To comply with all environmental legislation, regulations and all local laws which relate to the organisations environmental aspects to facilitate the protection of the environment.

To have a process that ensures conformity to local regulations, including those relating to the reduction, reuse and recycling of waste and the elimination and safe disposal of dangerous materials.

To identify a person within its business who has responsibility for environmental compliance issues and to be able to demonstrate that responsible personnel are adequately trained in environmental matters.

To routinely identify risks of adverse environmental impact associated with their operations and where operations with identified risks are planned to ensure they are carried out under controlled conditions with the objective of minimising potential adverse impact upon the environment.

Principles

We will use the following best practice principles to guide the implementation of our policy:

Principle 1: Working together.

We will:

work collaboratively with suppliers in pursuit of this standard.

guide relationships by the principle of continual improvement.

welcome rather than penalise suppliers identifying activities that fall below this standard (undertaken by themselves or sub-contractors) and who agree to pursue their aspirations.

consider a similar ethical trading standard as a reasonable alternative where suppliers are already working towards sustainability.

Principle 2: Making a difference.

We will, and we expect our suppliers to:

use an environmental and social risk-based approach to the implementation of this standard.

focus attention on those parts of the supply chain where the risk of not meeting this standard is highest and where the maximum difference can be made with resources available.

be prepared to demonstrate the basis of their approach about the above.

Principle 3: Awareness raising and training.

We will, and we expect our suppliers to:

ensure that all relevant people are provided with appropriate training and guidelines to implement the requirements of this standard.

Principle 4: Monitoring and independent verification

We will:

recognise that implementation of this standard may be accessed through monitoring and independent verification, and that these methods will be developed as our understanding grows.

We will expect our suppliers to:

provide reasonable access to all relevant information, premises, and workers (through interviews) and co-operate in any assessment against this standard – using reasonable endeavours to ensure that sub-contractors do the same.

use reasonable endeavours to provide workers covered by this standard with a confidential means to report to the supplier failure to observe its requirements.

Principle 5: Continuous improvement

We will, and we expect our suppliers to:

apply a continual improvement approach in agreeing schedules for improvement plans with suppliers not meeting this standard.

base improvement plans on individual case circumstances.

Ultimately, Connexion Developments Ltd will not do business with a supplier where serious breaches of this standard are identified and where the supplier consistently fails to take corrective action within an agreed timescale.

Responsibility and Authority

This policy standard is issued under the authority of the Managing Director, Connexion Developments Ltd. Responsibility for implementation of this policy standard is set out below.

Responsibility for the achievement of this policy standard rests with the Company Directors + General Manager.

Directors are responsible for implementing the policy standard, monitoring its implementation in the everyday activities of their division and report to their divisional board.

Managers are responsible for implementing the policy standard, monitoring its implementation in the everyday activities of their operations and report to their directors.

The Managing Director is responsible for reviewing the policy standard and ensuring that it is kept up to date with changes in legislation. It is also responsible for the development of guidance and training on the implementation of the policy standard and for providing appropriate reports to the board.

Evidence of Compliance

The Directors will carry out regular monitoring of the implementation of sustainable procurement commitments and ethical standards by business units to enable us to identify trends and ensure that environmental and social factors are being considered in procurement decisions.

To demonstrate compliance with this policy standard, each division is required to provide access to documentation and records for audit purposes.