

**Responsible Procurement Policy****RESPONSIBLE PROCUREMENT POLICY****Key Areas:**

1. Respect Human Rights and secure appropriate working conditions.
2. High standards of ethics and business standards.
3. Minimise environmental impact.
4. Integrity in our business transactions.
5. Open and fair communication.

**Responsible Procurement Policy****RESPONSIBLE PROCUREMENT POLICY****1. Respect Human Rights and Secure Appropriate Working Conditions**

ACIEM Group Ltd will only engage with subcontractors and suppliers that have and can demonstrate compliance to the following: Working Time Directive (2003/88/EC), National Minimum Wage Act 1998, Employment Rights Act 1996, Protection of Young People at Work Council Directive 94/33/EC, Trade Union & Labour Relations (Consolidation) 1992, TUPE 2006, Pensions Act 2004, The Gangmasters (Licensing) Act 2004 & all applicable obligations under European Labour Law within the European Convention on Human Rights.

When sourcing suppliers/subcontractors for our contracts, we will seek to:

**Promote Fair Employment Practices**

- Seek to promote benefits to supply chain of fair employment practices.
- Review subcontractors policies towards a position of fair wage and the environment they work in, and their contractual terms represent reasonable minimum standards.

**Promote Workforce Welfare**

- Our contract terms require our contractors to provide adequate welfare and protection for their workforce.

**Meet Strategic Labour Needs and Enable Training Opportunities**

- Work with our suppliers to wherever appropriate; provide employment opportunities that are communicated to local communities.
- Seek to allow, within our contracts, opportunities for training and employment provisions for local communities and under-represented groups.

**Promote Community Benefits**

- Take measures to understand the impact our procurement has on local communities.
- Encourage positive contribution from our suppliers to the local communities in which they work.

**2. High Standards of Ethics and Business Standards**

ACIEM Group Ltd will only engage with subcontractors and suppliers that have and can demonstrate a zero tolerance to slavery and human trafficking and compliance to the Modern Slavery Act 2015. Subcontractors and Suppliers are also reminded of their statutory obligations under the Equality Act 2010, not to discriminate directly or indirectly on the grounds of colour, race, nationality, ethnic or national origins, sex, marital status, gender reassignment, disability, sexual orientation, religion, belief or age (“unlawful discrimination”)

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in relation to decisions taken to recruit, select, remunerate, train, transfer and promote employees. ACIEM Group Ltd also requires compliance to the Immigration, Asylum and Nationality Act 2006, Immigration Act 1971, Illegal working often results in abusive and exploitative behaviour, the mistreatment of illegal migrant workers, tax evasion and poor housing conditions. It can also undercut legitimate businesses and have an adverse impact on the employment of people who are lawfully in the UK.

**Ethical Sourcing Practices**

When sourcing suppliers/subcontractors for our contracts, we will seek to source those who:

- Afford their employees the freedom to choose to work for them. Suppliers should not use forced, bonded, non-voluntary prison labour.
- Establish recognised employment relationships with their employees in accordance with national law and good practice.
- Demonstrate commitment to equality and free from discrimination and oppression.
- Have appropriate disciplinary, grievance and appeal procedures in place.
- Work within the laws of their country.
- Ensure the Health & Safety of their workforce.
- Take measures to ensure that child labour is not used in their operations or manufacture of any parts in their materials.
- Do not support, encourage or facilitate the trade of drugs, tobacco, slavery or prostitution.
- Offer wages and benefits that as a minimum meet relevant industry benchmarks and legal standards.

**3. Minimise Environmental Impact****3.1 Resourcing**

When sourcing material and services for our contracts, we will seek to:

Raise environmental awareness and encourage purchase of more environmentally sound products that:

- Have a potentially direct environmental benefit. Fewer emissions, less waste and more efficient resources use.
- Improve the market position of suppliers.
- Act as an incentive for technological development towards greener products.

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- Promote sustainable and environmentally efficient purchasing and aim to avoid unnecessary purchasing by:
- Reviewing the actual need of the product.
- Seeking alternative suppliers, goods and services, i.e. sourced from sustainable manufacturing, with lean processes in place.
- Seeking alternative suppliers that are aligned to the company's environmental targets.
- Purchasing a greener variant with comparable if not better performance than a conventional choice.

**“Sustainable forests”, “recyclable”, “earth friendly”**

It is important to verify claims made by the manufacturer and supplier.

- Ensure that written documentation that backs up the claims of the supplier.
- Check when was supplier documentation and process last reviewed and to what standard or accreditation.
- Obtain a copy of their environmental report or technical data where possible.

**3.2 Environmental Purchasing - Decision Making**

We will implement this Procurement Policy using a step-by-step approach to procuring greener goods and services. The overall objective is to raise awareness with both current and new suppliers and link with other organisations in the same sector. We will seek to move to more environmentally friendly products and services where these do not put us at a significant commercial disadvantage.

The Company will focus on the specific Objectives:

- Focus on products or services that have the greatest environmental impact.
- Examine products that would be highly visible within the Company; for example, stationery, or office electrical equipment.
- Integrate reused, refurbished, remanufactured and recycled-content products into current operations wherever possible.
- Use greener products available through existing suppliers, such as energy saving office equipment and biodegradable cleaning products.
- Support local manufacturing efforts by purchasing at least a portion of the Company's recycled products from local manufacturers where they exist.

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- Actively encourage suppliers to provide products and services that have a minimum adverse environmental impact. Request suppliers to identify harmful processes and materials in their manufacturing processes. Seek suppliers that are working towards the phase out of such practices.
- It is not always possible to purchase a green alternative for every product or service. Compromise will be required. It is therefore important to address the significant environmental impacts of the purchasing policy, and to minimise the effects.
- Specific Targets and actions will be set and agreed to achieve changes in purchasing practice. (E.g. all paper to be of recycled content throughout the office by next financial quarter; all newly purchased electrical equipment must be energy efficient rated).
- The Company will work co-operatively with other organisations to purchase environmentally. We will network with internal departments and neighbouring businesses, whenever and wherever possible.
- Endeavour to buy cheaper in bulk. This can also reduce packaging and transport impacts.

### **3.3 Purchasing Preference Criteria for Products and Services.**

- Can the product be leased or rented rather than bought?

### **3.4 Resource Use and Recycling**

Where production/extraction can cause ecological damage, such as loss of habitats or damage to threatened species we will seek a better environmental option:

- Are there alternative materials and products?

For materials and products

- Is this a remanufactured product?
- Can the product be re-used, refilled, recharged or reconditioned to extend its life?
- Can adding or replacing a part easily upgrade the item?
- Does the product have a recycled content? What percentage?
- Is the product accredited with a recognised environmental standard?
- Can the product be recycled easily (in the workplace and/or local community)?
- Can the product be disposed of in an environmentally safe way at the end of its useful life?

### **3.5 Hazardous content**

We will manage products or components which are hazardous to humans and/or the wider environment in a responsible manner.

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- What are the health and safety implications and disposal requirements?
- Are there any non-hazardous alternatives available?
- Are technical data sheets available?

**3.6 Energy**

We will seek to reduce energy consumption. For products/items that use energy (e.g. electrical appliances, equipment, machinery, space heating or vehicles).

- Is the item as energy efficient as the alternatives?
- Does the item have energy consumption data for all operation modes?

**3.7 Packaging**

We will seek to reduce the impact of packaging

- Can product packaging be reduced or eliminated?
- Is packaging made of recycled material(s)?
- Can packaging be re-used, recycled or returned?

**3.8 Transportation**

We prefer

- Products locally manufactured and/or locally supplied
- Suppliers with a Green Transport Plan for their operations?

**3.9 Supplier Environmental reporting**

We will encourage suppliers to improve their environmental management.

- Does the supplier have a company Environmental Management System?
- Does the supplier report on their environmental performance against set targets?

**4. Integrity in our business transactions**

We will not engage in bribery or any forms of unethical inducement or facilitation payments and will not tolerate any such behaviour from our supply chain partners.

**5. Open and fair communication**

We will be open, transparent and fair in our communications and dealings with our supply chain and other stakeholders affected by supply chain activities. We will take reasonable steps to ensure that we fulfil the payment terms and other conditions agreed with our supply chain.