

Sustainable Procurement Policy



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Classification	PUBLIC

Overview

The Sustainable Procurement Policy establishes baseline environmental, social and governance criteria that must be met in order to onboard a vendor.

The applicability of this statement falls under purview of the [Security Documentation Overview](#).

Scope

This policy is applicable to all employees involved in vendor management.

Sustainable Procurement Policy

Governance

The sustainable procurement strategy is overseen by the ESG committee, who inform and communicate with the board where necessary.

All vendors are assessed prior to onboarding and at least annually thereafter for sustainability performance as per the [Vendor Management Policy](#). The GRC team are responsible for vendor management processes.

Commitments

We commit to:

- Comply to all applicable environmental and social regulations related to procurement
- Take a risk-based approach, prioritising scrutiny of high risk/impact vendors
- Require suppliers to comply with our Supplier Code of Conduct where applicable
- Integrate sustainability criteria into our vendor approval process, see [Vendor Management Policy](#).
- Benchmark vendor performance
- Continually improve our processes related to sustainable procurement

Monitoring and reporting

Internal audits of vendors will take place at least annually in line with the [Vendor Management Policy](#) and be documented and retained.

Sustainability Criteria

The criteria that vendors are assessed against are as follows:

- Carbon Emission data
- Energy data
- Supply Chain Management
- Distribution data
- Disposal data
- Modern Slavery and Anti-Child Labour statements
- Professional and Business Integrity
- Responsible Treatment of Individuals
- Protecting Information
- Responsible Use of Technology and Recognized, Informed and Safe Use of Artificial Intelligence

Non-compliance

Potential new vendors that are not compliant with the Supplier Code of Conduct will not be approved unless reasonable mitigations are in place.

Existing vendors who fall out of compliance with the Supplier Code of Conduct will be notified and asked to regain compliance. Reasonable mitigations will be accepted, for example improvement plans. Vendors who cannot or will not align and comply with our Sustainable Procurement will be assessed with a view to terminate our relationship.

Document control

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Document Owner	Art Machado	
Author(s)	Art Machado, Angelina Kilmer, Paul Gordon	
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Version History

Date	Author(s)	Version	Changes
Jan 8, 2026	Paul Gordon	1.0	Creation of a new, standalone policy