



## Ethical Procurement Policy

Project Group aspire to achieve the core international ethical procurement standards and has set out the Ethical Procurement Policy. The key aspects of Project Group Ethical Procurement Policy are:

### Ethical trading

Products bought from and by Project Group must be manufactured under working conditions consistent with international guidelines. It is a collaborative undertaking that requires an active support of all our suppliers.

### Working Together

Project Group will:

- work collaboratively with suppliers in pursuit of these standards
- welcome rather than penalise suppliers identifying activities that fall below these standards (undertaken by themselves or sub-contractors) and who agree to pursue our aspirations
- review and where appropriate, revise these principles in the light of experience
- consider a similar standard as a reasonable alternative where suppliers are already working towards this alternative
- not hold a supplier to a higher standard than Project Group own policy on these issues

### Supplier relationships

Project Group seeks to develop long-term business relationships with suppliers who should have a natural respect for our standards in the context of their own particular culture. We specifically require our suppliers to extend the same principle of fair and honest dealings to all others with whom they do business – including employees, subcontractors and other third parties.

### Legal aspects and intellectual property rights

We will always comply fully with the legal requirements of the countries in which we do business and our suppliers are required to do likewise at all times. The intellectual property rights of third parties will be respected by all concerned.

### Environmental aspects

The realisation of environmental standards is a complex issue – especially in developing countries. Project Group will work with suppliers to help them meet our joint obligations towards the environment.

### Disclosure and inspection

We require suppliers to make full disclosure to us of all facts and circumstances concerning production and use of sub-contractors. All Project Group suppliers are obliged to make their subcontractors aware of, and comply with, the Project Group Ethical Procurement Policy. Additionally, our suppliers are required to authorise any auditing company appointed by Project Group to make unannounced inspections of any manufacturing facility at any time.

IMS 2017	Revision	Issue Date	Review Date	Process Owner:	Approved by:	
	12	25/07/2025	Annually	Group Compliance Manager	Group Managing Director	PRINTED DOCUMENTS ARE UNCONTROLLED

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### Awareness Raising and Training

Project Group and its suppliers should:

- ensure that all relevant people are provided with appropriate training and guidelines to implement the standards

Project Group suppliers should:

- ensure that employees whose work is covered by the standards are made aware of this document, utilising appropriate and effective communications mechanisms translate these standards into the local language and display them prominently at the place of work

### Monitoring and Independent Verification

Project Group suppliers should:

- recognise that the implementation of these standards may be assessed through monitoring and independent verification, and that these methods will be developed as our understanding grows
- provide Project Group, or its representatives, with reasonable access to all relevant information and premises and co-operate in any Sourcing with Human Dignity assessment - using reasonable endeavours to ensure that sub-contractors do the same
- use reasonable endeavours to provide workers covered by the standards with a confidential means to report to the supplier failure to observe the standards

### Continuous Improvement

Project Group and its suppliers should:

- apply a continuous improvement approach in agreeing schedules for improvement plans with suppliers not meeting these standards
- base improvement plans on individual case circumstances
- not use this policy to prevent suppliers from exceeding these standards

Project Group consider terminating any business relationship with the supplier concerned where serious shortfalls of these standards persist.

### Transparency, Confidentiality and Fairness

Project Group suppliers will be treated fairly and even-handedly at all stages of the procurement process. Supplier confidentiality will be safeguarded, and unsuccessful suppliers will be debriefed with as much transparency about the procurement process as can be provided, for example, on the weaker aspects of their tender.

### Use of Power

Project Group will discourage the arbitrary or unfair use of purchasing power or influence.

### Corruption

Project Group will not tolerate corruption in any form. Bribery is a criminal offence in the UK (and in most other countries) and the law is being strengthened to include offshore bribery.

### Payments from suppliers

Suppliers should not have to pay to be included on an approved or preferred supplier list. Suppliers are selected on the basis of meeting appropriate and fair criteria.

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### Barter and reciprocal trading

Where appropriate, barter is acceptable business practice, but reciprocal trading may not be. Barter is trade by exchange of goods or services for other goods or services. There is no exchange of money and, as barter is not usually a condition of contract between two parties, coercion is not an issue, provided both parties have a current business need for the goods/services of the other party.

Reciprocal trading which is conditional on suppliers also being customers of an organisation is unacceptable business practice. Reciprocal trading is acceptable only when there is no coercion, both parties are in agreement and there is mutual benefit and transparency.

### Supplier relationships and competition

Project Group will manage suppliers, and supply networks comprising multiple tiers of suppliers, in a professional manner. Both short- and long-term contracts have their place, but from time to time longer-term contracts especially are subject to open and transparent competition. Where there is only one supplier capable of meeting the requirements, established internal business controls will be respected in the quest for the best value for money solution

### Employment Conditions

In addition to the general requirements that all suppliers will extend the principle of fair and honest dealings to all others with whom they do business, Project Group also have specific requirements relating to employment conditions based on respect for fundamental human rights. These requirements apply not only to production for Project Group but also to production for any other third party.

#### Employment is Chosen (No Forced Labour)

- Employees should be free to choose to work for the supplier, i.e. their employer
- Employees should be free to leave the supplier after reasonable notice is served
- Suppliers should not use forced, bonded or non-voluntary prison labour

#### Employment Relationships

- Suppliers should establish recognised employment relationships with their employees that are in accordance with their national law and good practice
- Suppliers' employees should be provided with an easy to read contract of employment with particular clarity in relation to wage levels
- In the event that employees are unable to read, the contract of employment should be read and explained to them by a union representative or another appropriate third party
- Suppliers should not seek to avoid providing employees with their legal or contractual rights

#### Freedom of association

- Suppliers should not prevent or discourage employees from joining trade unions
- Suppliers' employees should be able to carry out reasonable representative functions in the workplace
- Suppliers should not discriminate against employees carrying out representative functions

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- Where the law restricts freedom of association and collective bargaining, suppliers should facilitate alternative means of representation

### Suppliers' Employees' Wages and Working Hours

- Wages and benefits should at least meet industry benchmarks or national legal standards
- As a minimum, the wages paid to suppliers' employees should meet their basic needs
- Suppliers should not make deductions from wages unless permitted by national law or with the permission (without duress) of the employee
- Suppliers should always pay in cash and not in kind, e.g. goods, vouchers
- Working hours should comply with national laws or industry standards
- Suppliers' employees should not be expected to work more than 48 hours per week on a regular basis
- On average, suppliers' employees should be given one day off approximately every seven days
- Suppliers should not pressurise employees into working overtime; overtime should be voluntary and not be demanded on a regular basis
- Where overtime is requested by the employer it should be reimbursed at an appropriate rate and should not exceed 12 hours in any week

### Suppliers' Treatment of Employees

- Under no circumstances should suppliers abuse or intimidate in any fashion, employees
- Any disciplinary measures should be recorded
- Suppliers should have a grievance/appeal procedure that is clear, easy to understand and should be given to the employee in writing
- In the event that suppliers' employees are unable to read, the grievance/appeal procedure should be read and explained to them by a union representative or another appropriate third party

### Health and Safety

- Suppliers should assign responsibility for health and safety to a senior management representative
- Suppliers should have appropriate health and safety policies and procedures and these should be demonstrable in the workplace
- Suppliers' employees should be trained in health and safety policy and procedures
- Suppliers should monitor compliance with health and safety policy
- Suppliers should provide employees (at the supplier's expense) with any necessary health and safety equipment, e.g. gloves, masks, helmets
- Working conditions should be comfortable and hygienic
- Suppliers should identify specific hazards e.g. substances or equipment, and should implement processes to minimise risk
- Suppliers' employees should have access to clean toilets
- Suppliers' employees should have regular breaks and have access to water suitable for drinking and washing as a minimum

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### Child Labour

In principle Project Group is against the use of child labour and believes its long-term elimination is ultimately in the best interests of children. However, the elimination of child labour must always be undertaken in a manner consistent with the best interests of the children concerned.


Project Group Suppliers shall:

- develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child
- not employ children and young persons under 18 at night or in hazardous conditions
- in any event the course of action taken shall be in the best interest of the child, conform to the provisions of International Labour Organisation (ILO) Convention 138 and be consistent with the United Nation's Convention on the Rights of the Child

Workers must not be younger than the legal minimum age for working in any specific country and not less than 14 years, unless local legislation on the minimum age stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.

### Discrimination

- Suppliers should have a policy of equality for all in the workplace with no discrimination on the basis of race, caste, religion, nationality, age, gender, marital status, sexual orientation, disability, union membership or political affiliation.

Signed:   
Name: TOM OWENS

**Project Group**

**Group HR & Compliance Director**

**25/07/2025**

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