

Ethical Procurement Policy

APEM Group is fully committed to uphold ethical business practices and comply with legislation by understanding the risks and complexities of the services we procure and respond to performance issues appropriately. We engage with suppliers who share the same values and priorities to ensure a sustainable service provision.

Purpose and scope

This policy governs the way we work with our suppliers, clients, business partners and third parties. The policy applies to all employees who procure from suppliers in all our operating countries.

Policy objectives

APEM Group takes pride in being a company built upon honesty and integrity. We value the relationships developed with other organisations in our supply chain and prefer to do business with those who understand and share our business aims and values. All staff involved in the procurement of goods, services or works from the external supply chain are expected to have regard for APEM Group's commitment to providing the highest quality of service, to add value, minimise costs and have limited negative impact on the environment.

Using suppliers, business partners and third parties gives us flexibility and is integral to the sustainable delivery of client commitments. The objectives of this policy are to:

- Make sure that suppliers comply with our policies and other legal requirements (including health and safety, human rights and labour standards, and employment laws);
- Identify the risks associated with using suppliers and manage these risks to an acceptable level;
- Ensure that the roles and responsibilities of suppliers are clearly defined and adhered to;
- Ensure that the way we supply and develop our services reflects our sustainability objectives and those of our clients.

To meet these objectives, APEM Group seeks to ensure that it develops and maintains mutually beneficial partnerships and that all parties across its supply chain will:

- Act honestly and transparently and demonstrate high professional and ethical standards and excellent corporate governance;
- Agree key performance indicators against which performance will be assessed;
- Agree terms and conditions which are reasonable and not unduly onerous for either party;
- Provide value for money including price, quality, reliability, operating costs, etc.;
- Comply with all legal and statutory requirements including health and safety, anti-bribery, equality and diversity, etc.;
- Responding to issues and events in a prompt and timely manner;
- Provide goods and services which are appropriate for the specified technical and quality requirements;
- Deliver goods and services in a timely manner, as and when they are required;
- Ensure that any goods and services do not compromise the rights of individuals;
- Meet payment terms;

- Ensure that small and medium enterprises are given opportunity to collaborate on bids for work with us alongside larger organisations;
- Support local businesses in areas where they operate;
- Not divulge commercially sensitive information to other suppliers or third parties;
- Understand that offering or receiving inducements is not permitted; and that while appropriate hospitality can arise out of business relationships between APEM and other organisations, anyone benefitting from such hospitality will not be, or perceived by others to be, influenced in making a business decision as a consequence of accepting such hospitality.

Requirements

Supplier selection: APEM will appoint suppliers for their ability to perform as defined, as well as taking into consideration social values, ethical practices and environmental impacts. APEM will encourage suppliers to monitor the sustainable credentials of their own suppliers.

Manage contracts: APEM will ensure that all contracts address the key issues. These include defining vendor expectations, performance, scope of work, and deliverables. In particular, APEM will seek confirmation regarding understanding of and adherence to APEM policies and make sure that all contracts protect our physical and intellectual property and data.

Extend opportunities: Provide equal opportunities for SMEs, minority owned businesses, social enterprises and the voluntary and community sector.

Manage subcontracting: Ensure that any right to subcontract included in the contract is bound by the same terms and conditions and is expressly agreed and approved by the contract manager prior to commencement. Our subcontract contracts are bound by same terms as contracts with our client.

Monitor suppliers: Monitor suppliers to ensure that the supply chain risk is managed.

Responsibilities

The **CEO** is responsible for reviewing, endorsing and achieving this policy's aims.

The **Business Support team** are responsible for:

- Administering this policy on behalf of the CEO and board of directors;
- Developing and rolling out the supporting strategies to drive continual performance improvement;
- Driving, adopting and sharing best practice purchasing and supply standards and initiatives;
- Developing mutually beneficial collaborative relationships with suppliers which increase the accountability (including environmental performance) of our supply chain;
- Monitoring the evaluation and assessment of suppliers' supply practices (including ethical, sustainable measures), taking appropriate commercial action as necessary.

Team Managers and Associate Directors are responsible for:

- Ensuring that this policy, supporting procedures and corrective actions are implemented and complied with;
- Leading by example in protecting the APEM Group brand and championing knowledge sharing across the divisions;
- Implementing and enforcing the processes and procedures;
- Addressing any inappropriate behaviour;

- Undertaking effective sustainability evaluation and applying corrective actions;
- Ensuring that their team are aware of their responsibilities and receive appropriate training.

Employees are responsible for:

- Carrying out their work in line with this policy and associated procedures;
- Challenging any behaviour that falls short of the expectations of this policy and identifying any breaches of this policy and reporting them to their line manager.

Suppliers are responsible for:

- Acting in accordance with this policy and associated procedures and guidance.

Any APEM employee who fails to meet their obligations under this policy may be subject to disciplinary action. APEM can choose to terminate any external relationship which it considers to be breaching the spirit of this policy.

It is the responsibility of all APEM Group employees to comply with this policy and to report concerns. APEM Group prohibits any form of retaliation for the reporting of such matters.

All staff will be made aware of this statement as part of their induction on appointment and subsequent on-going training. This policy is communicated and published on the company website for all interested parties.

Reference	Version	Date released	Approved by
T1-GP-020	1	10/08/2023	Leah McGimpsey APEM Group Chief Executive Officer
This policy is communicated and published on the company website for all interested parties.			
This policy is subject to periodic review and change to ensure it remains valid. The review period is annotated within the Version Control section, or the policy may be reviewed prior to this date when prompted by context, such as developments in legislation, industry practice, or the organisation.			
This Policy has been Equality Impact Assessed and no adverse impact has been identified.			