

Procurement Policy

Aim of this Policy

This policy outlines how we will engage and manage our sub-contractors, suppliers and consultants (hereinafter referred to as the "Supply Chain") to ensure that we procure in a sustainable manner and all parties are treated fairly and ethically.

The Trading Board of Morris & Spottiswood ("the Company") is committed to the fair and ethical treatment of our Supply Chain and will work to ensure that our processes and procedures reflect this. The Company has an expectation that our Supply Chain will have the same values and will only work with organisations who can demonstrate this commitment.

As a business, we will abide by all relevant laws and regulations and expect our Supply Chain to do the same.

Ethical Procurement

The Supply Chain should be treated fairly at all stages of the procurement process. We will remain open and transparent with regard to all elements of a procurement process. This includes the procedures, timescales, requirements, and criteria for selection.

We will ensure that where possible we provide feedback on performance commercially and operationally to ensure that our Supply Chain is aware of any areas of improvement. We will also ensure that there is a mechanism for feedback to the Company to allow us to ensure that our processes remain fair and transparent.

The Company will not engage in the unfair use of buying power or influence. Where relevant, we will engage in long-term strategic relationships with our core Supply Chain members to allow both parties to provide best value.

We have identified our core categories and have developed a strategic category management process that provides a structured framework to manage the relationship.

The Company does not tolerate corruption in any form (direct or indirect). Any corrupt activity identified should be reported immediately to the Head of Supply Chain or Finance Director.

The Company requires all personal interests to be declared. If a colleague or a member of the Supply Chain feels that they have a personal interest which may affect, or be seen to affect, their impartiality or judgement this should be notified to the Head of Supply Chain or the Finance Director.

Modern Slavery

The Company adopts a zero-tolerance approach to slavery and human trafficking. We are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking are not present in our own business or those of our Supply Chain. We are also committed to ensuring that workers are not exploited, that they are safe, and that employment standards (including pay and working time), health and safety laws, and human rights protections are adhered to.

We expect the same high standards from our Supply Chain and actively work with them to identify and mitigate risks of modern slavery. We have implemented the following to mitigate these risks:

- Risk assessments identifying high-risk areas within our Supply Chain.
- Assessment processes requiring the Supply Chain to confirm compliance with the Modern Slavery Act.
- Contractual obligations for the Supply Chain to meet anti-slavery requirements.
- Mechanism for monitoring and auditing high-risk Supply Chain members and those where concerns are raised.

In cases where a member of the Supply Chain falls short of our standards, we will engage with them to implement corrective action plans within a defined timeframe. Persistent failure to meet requirements may result in contract termination.

Health & Safety

The Company has an obligation to ensure that working conditions on our sites are safe for the Supply Chain we engage. Our health and safety agenda follows our theme of Valuing Life and we encourage everyone on our sites to challenge unsafe behaviour and activity.

We will ensure that the procedures and processes in place within our Supply Chain are assessed and meet the minimum standard of current and relevant legislation for health and safety.

Our site teams will have the necessary training to manage our sites in a safe manner and will be supported by our team of qualified and experienced health and safety advisors.

Any concerns about health and safety should be raised to our Head of Supply Chain or Finance Director.

Anti-Bribery & Corruption

By entering into a working relationship with the Company you agree that:

- You are familiar with the definition of bribery under the Act, the ways in which an offence can be committed, and the penalties which can be imposed as a result;
- You (or any individuals in your organisation) are an "associated person" as defined by the Act, and that your organisation will take all necessary steps to ensure that its employees are aware of their obligations under the Act;
- In the event of any bribery being offered or suggested by your organisation, the Company will not as a result be liable for the 'corporate offence' as defined in the Act.

The Company's expectations:

- The giving of illicit payments, of commercial advantage or of lavish gifts or hospitality are not acceptable.
- Entering into any kind of arrangement with an employee of the Company who would benefit personally in return for work or contracts being awarded, will be considered a bribe.
- Offering travel or subsistence payments during product familiarisation visits / tender processes will be considered a breach of this policy.

The Company may at any time insist on seeing your organisation's anti-bribery policy, or equivalent, and may refuse to continue working with you if you do not provide this.

The Company will regard the following (non-exhaustive) activities as being indicative of bribery by a Supply Chain member:

- Engaging in, or being accused of engaging in, improper business practices;
- Requesting payment in cash and / or refusing to provide an invoice or receipt for a payment made;
- Requesting that payment is made to a country or geographic location different from where the organisation resides or conducts business;
- Requesting an additional fee to "facilitate" a service;
- Suggesting or requiring the use of an agent, intermediary, consultant, distributor or other supplier that is not typically used by or known to the Company; or
- Offering an unusually generous gift or lavish hospitality.

Sustainable Procurement of Materials

The Company are keen to ensure that all goods and materials purchased are sustainable and take account of environmental and social issues. As part of our approval process, we will ask for evidence of sustainable procurement from our Supply Chain. If any Supply Chain member is not able to provide this evidence, this may preclude the Company from engaging on future works.

We encourage our Supply Chain to suggest alternative materials or products that would be more sustainable than those specified.

The Company is required to report on Scope 1, 2 and 3 emissions and will therefore require our Supply Chain to share relevant information in order to facilitate this. This includes (but is not limited to):

- Delivery mileage for materials
- Travelling distance to site for operatives
- Sustainable certification for materials

As a minimum, the Company expect all materials delivered to our sites or utilised in the manufacture of items delivered to our sites to be from sustainable sources wherever possible. The Company expects all timber products to be from FSC/PEFC sources and we will require our Supply Chain to be able to evidence this.

Where a project or client requires evidence of the sustainability of materials utilised in the build process, the Company will provide advance notice of this to the Supply Chain and will support wherever possible the collation of this information.

Scope of this Policy

This policy applies to every Supply Chain member engaged by any part of the Morris & Spottiswood Group. The Company reserves the right to amend this policy at any time.

Relevant Policies (available on our website):

- Modern Slavery & Human Trafficking Policy
- Health & Safety Policy
- Environmental Policy
- Anti-Bribery Statement of Intent