

## Corporate and Social Responsibility Policy

CSR is defined as the integration of business operations and values, whereby the interests of all stakeholders including investors, customers, employees, the community and the environment are reflected in the companies policies and actions. This policy aligns with current CSR and ESG (Environmental, Social and Governance) expectations.

### Commitment

We are committed to:

- Continuous improvement in our Corporate and Social Responsibility (CSR) strategy
- Engaging our business partners to strive for matching performance
- Acting in a socially responsible way
- Continually improving our performance and meeting all relevant legislation
- Encouraging our staff to be mindful of the effect of their actions on any natural resource.

### Purpose and Aims

The purpose of the policy is to make clear to all stakeholders what we mean by CSR and how we propose to work towards achieving it. The CSR policy applies throughout all the Procurement Service and governs our approach to all our activities.

In implementing this policy we aim to:

- Be responsible,
- Be an exemplary of good practice.

### Standards of business conduct

- We recognise that good CSR embraces all aspects of sustainable development and the way we affect people through our business operations.
- We will assess which social issues are of most relevance to the contract and decide at what stage in the procurement lifecycle this social policy could most effectively and legally be included.
- We shall operate in a way that safeguards against unfair business practices.
- We believe that a responsible approach to developing relationships between companies and the communities they serve, global or local, is a vital part of delivering business success.
- When carrying out our business in consultation with our customers, we will determine the environmental, social and economic issues.
- Our contracts will clearly set out the agreed terms, conditions and the basis for our relationship.
- We will continually review our policies and business practices to encourage engagement with small and medium enterprises and to promote the development of the regional supply chain.

### Corporate Governance

- We will share and declare information on personal and corporate conflicts of interest and seek guidance from higher authority before acting.

- We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards.
- All the laws that regulate and apply will be complied with
- We endeavor to ensure that stakeholders have confidence in the decision-making and management processes of the Procurement Service, by the conduct and professionalism of all staff. We do this by continually training and developing our staff.
- All groups and individuals with whom we have a business relationship will be treated in a fair, open and respectful manner.
- Competition will be reasonable and based upon quality, value and integrity of the products and services being supplied.
- Feedback on performance will be actively sought, and we will continually review all activities to ensure best practice is observed at all times
- We will allow our customers and vendors to give feedback on our performance and ensure that all customer comments are analysed, responded to and where appropriate, acted upon.
- An action plan will be developed to ensure continuous improvement is achieved.

#### Data Privacy and Cybersecurity

We are committed to protecting the confidentiality, integrity, and availability of all data we process, store, or transmit. Safeguarding personal information, commercial data, and operational systems is essential to maintaining trust with our customers, vendors, employees, and stakeholders. Our approach to data privacy and cybersecurity reflects recognised best practice and applicable UK legislation, including UK GDPR and the Data Protection Act 2018.

- **Protection of Personal Data-** We will collect, store and process personal data responsibly, lawfully and transparently, ensuring that information is only used for legitimate business purposes and retained no longer than necessary.
- **Data Security Controls-** We maintain appropriate technical and organisational measures to protect systems and information against loss, unauthorised access, misuse, alteration, or disclosure. These include (but are not limited to) secure networks, encryption, access controls, endpoint protection, and continuous monitoring.
- **Cybersecurity Awareness and Training-** All employees handling data will receive regular training on cybersecurity risks, safe data handling, phishing awareness, and incident-response procedures to ensure responsible and informed behaviour.
- **Vendor and Supply Chain Security-** We require our vendors, contractors and service partners to follow robust data-protection and cybersecurity standards. Where appropriate, we will carry out due diligence on suppliers, particularly those who store or process data on our behalf.
- **Incident Reporting and Response-** We have procedures for detecting, reporting, and investigating data breaches or cyber incidents. Any suspected breach will be reported promptly to the appropriate internal teams and, where required, to regulators and affected parties.
- **Access and Confidentiality-** Access to personal and sensitive information is limited strictly to those who require it for legitimate business needs. All staff are required to uphold confidentiality obligations both during and after their employment or engagement with the company.
- **Continuous Improvement-** We regularly review and update our data privacy and cybersecurity practices to respond to emerging threats, technological developments,

changes in law, and lessons learned from internal reviews or external guidance.

### **Environment**

- Our objective is to endeavour to reduce our impact on the environment through a commitment to continual improvement. This is outlined in our Carbon Reduction plan. Goals include measuring Scope 1, Scope 2 and Scope 3 emissions annually with particular focus on our net zero targets, waste reduction and energy emissions.
- We will continue to work with our vendors to reduce their impact on the environment
- We do assess production, use and disposal associated with the main goods we use.
- Our customers will be informed of the key issues involved in procurement so they can make informed purchases to reduce their impact on the environment.
- We will ensure that paper products used come from forests independently certified as well managed according to the standards of the Forest Stewardship Council (FSC) or from recycled materials. All virgin paper products have been banned throughout the company, environmental alternatives are used.

### **Human Rights**

- We aim to support and respect the protection of internationally proclaimed human rights.
- Vendors are actively encouraged to observe international human rights norms within their work.

### **Equality and Diversity**

- We aim to eliminate discrimination on any grounds and promote equality of opportunity in the supply chain.
- We will ensure that our customers and vendors are able to work together in confidence and be treated with respect by each party.
- Our range of contracts will take account of the needs of a diverse customer base.

### **Sustainability**

- A Sustainable Procurement Policy will be maintained that will set out the principles, policies and procedures on which sustainable business activity the company will be based.
- The policy will act as a prompt for staff to consider sustainability as a factor in all purchasing decisions.
- We seek to minimize the adverse environmental effects of people travelling to and from our offices.

### **Impact on Society**

- We will take steps to understand how we can most effectively support the needs of the local community and implement initiatives accordingly.
- Our impact on the local and wider community will be understood and nurtured.
- Dialogue with local communities shall be encouraged for mutual benefit.

### **Ethics and Ethical Training**

- We will ensure clear visibility through our supply chains, so we know where our products are made.
- Training will be provided to relevant people on environmental and social issues affecting our supply chains.

- We will ensure that vendors uphold the workplace standards and behavior consistent with the Company's requirements.

**Biodiversity**

- We will actively encourage the use of sustainable practices in the maintenance of the company grounds and premises.

**Vendors (Suppliers)**

- We shall encourage vendors to adopt responsible business policies and practices for mutual benefit.
- Vendors are regarded as partners and we will work with them to help us achieve our policy aspirations in the delivery of our products and services.
- A documented environmental and social assessment will be undertaken for every new contracted vendor.
- We are committed to ensuring that the welfare of workers and labour conditions within our supply chain meet or exceed recognised standards.
- Where appropriate our tender specifications include questions to reflect our desire for sustainable procurement.
- We hold regular meetings with vendors to support these ideas

We will continue to work with vendors to:

- Promote environmentally friendly products and promote these to our customers.
- Reduce the amount of packaging and transit where possible.
- Implement schemes to take back, recover, re-use and recycle products at the end of their use/life.

**Marcus Parias**

Operations Director.....

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