



# Sustainable Procurement Policy

## APPROVALS

The signatures below certify that this policy has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements retained herein and are committed to ensuring their provision.

## AUTHORISATION

This policy will be kept under review and formally revised at intervals not normally exceeding 12 months.

	Name	Signature	Position	Date
Prepared by			HSEQ Manager	14.02.2024
Reviewed by			Chairman	14.02.2024
Approved by			Chairman	14.02.2024

## Introduction

This policy outlines requirements for our suppliers regarding key social, ethical and environmental topics.

Our vision is to be the preferred distributor to the nations utilities network providers. To achieve this vision, it is important to focus not only on the quality but also the origin of our products.

Procuring from suppliers whom we can wholly trust and rely on to fulfil the requirements set out in this policy, provides us with confidence that the products and services we source are not having any undue effect on individuals, communities or the environment from which they are derived. We can then confidently communicate this to our customers.

## Scope

This policy applies to all procurement related activities across TW Engineering Co. Ltd.

Our suppliers should be aware of this policy, and their obligation to comply with it, through the incorporation of this policy in the General Terms and Conditions of Purchase of TW Engineering Co. Ltd.

From time to time we may request our suppliers certify their compliance with this policy.

## Supplier Requirements – Overview

This section outlines our supplier requirements regarding:

- Human rights
  - Modern slavery
  - Right to collective bargaining
  - Discrimination and diversity and
  - Harassment and violence
- Business integrity
- Workplace conditions



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- Health and safety
- Environmental management
- Responsible procurement
- Business continuity.

We expect our suppliers to develop control mechanisms which are truly appropriate for the size and complexity of their business. As a minimum standard we expect our suppliers to:

- Conduct business in a responsible manner covering, the requirements set out in this policy
- Adhere to local laws and regulations and
- Strive for continuous improvement

We endeavour to support our suppliers with the implementation of requirements where feasible. We encourage our suppliers who are not meeting specified requirements to contact TW Engineering Co. Ltd at the earliest opportunity.

## Non- Adherence

Non-adherence can result in cancellation or non-renewal of contracts. We classify serious misconduct as a material breach of contract in all cases. Examples of serious misconduct include, but are not limited to:

- The use of child labour
- Inhumane working conditions
- Negligence of health and safety requirements
- Exhibition of dishonest or fraudulent behaviour
- Intentional disregard for the environment causing harm.

## Human Rights

Suppliers are expected to respect the rights of individuals within their direct organisation and throughout their supply chain. We expect our suppliers to provide appropriate channels of communication for all employees to confidentially report concerns or breaches regarding human rights.

## Modern Slavery

Our suppliers must adhere to local employment laws and must not support any form of modern slavery either directly or indirectly.

## Discrimination and Diversity

We expect all places of work to be free of any form of discrimination and to promote diversity. At a minimum we expect our suppliers to document their stance regarding discrimination and diversity in the workplace via a policy, procedure, or declaration. We also expect our suppliers to be able to demonstrate that they have communicated this document to relevant employees. A suitable declaration to be provided to TW Engineering Co. Ltd upon request.



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## Harassment and Violence

We expect all places of employment to be free of harassment and violence. At a minimum, our suppliers are to document their stance regarding harassment and violence in the workplace via a policy, procedure or declaration. We also expect our suppliers to be able to demonstrate that they have communicated this document to relevant employees. A suitable declaration to be provided to TW Engineering Co. Ltd upon request.

## Business Integrity

Our suppliers must abide by all applicable anti-corruption, anti-bribery and anti-trust laws and regulations. We require our suppliers to have clear internal policies or guidance documents regarding compliance with these laws and regulations, and the ability to demonstrate that they have communicated them to relevant employees.

We expect our suppliers to provide to provide appropriate channels of communication for all employees to confidentially report concerns or breaches regarding anti-corruption, anti-bribery and anti-trust laws and regulations.

## Workplace Conditions

The place of work must be clean, hygienic, and safe. We expect our suppliers to have robust cleaning and maintenance plans in place.

## Health and Safety

Our suppliers must adhere to all relevant health and safety laws and regulations. We expect our suppliers to implement sufficient control mechanisms, taking care to:

- Establish a robust risk assessment procedure for high-risk work environments
- Implement an investigation and corrective action system for all health and safety incidents
- Embed health and safety continuous improvement into standard work
- Provide routine health and safety training for all relevant employees
- Have processes which allow and encourage employees to input into health and safety management.

Suppliers with ISO 45001 or equivalent certification are deemed to satisfy our requirements.

## Environmental Management

Our suppliers must adhere to all relevant environmental laws and regulations. We expect our suppliers to demonstrate an adequate level of environmental awareness, taking care to:

- Implement an investigation and corrective action system for all environmental incidents
- Complete an environmental risk assessment, at minimum on an annual basis
- Provide routine environmental training for all relevant employees
- Understand the organisation's environmental footprint and establish a reduction programme for one or more environmental impacts: e.g. water use, CO2 emissions.

Suppliers with ISO14001 certification, or a comparable certification are deemed to satisfy our requirements regarding Environmental Management.



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## Recycling & Waste Management

Our suppliers are required to have waste management infrastructure inclusive of recycling facilities where applicable. The collection and disposal of all waste must be managed through authorised service providers. TW Engineering Co. Ltd reserves the right to request evidence of waste disposal documentation.

## Energy Use

We encourage our suppliers to move away from non-renewable energy sources when feasible and economically viable. In the interim, we expect our suppliers to identify and implement energy saving initiatives where applicable.

TW Engineering Co. Ltd continuously assesses energy saving opportunities and we encourage our suppliers to contact us if they have any suggestions for collaborative projects.

## Responsible Procurement

We require our suppliers to manage their supply chain responsibly; taking care to identify and mitigate potential social, ethical and environmental risk. TW Engineering Co. Ltd expects that its suppliers conduct a suitable supply chain risk assessment and implement sufficient controls where applicable.

This assessment can vary in detail depending on the complexity of the supply chain. Regardless of the type/complexity of the assessment TW's procurement approach will be guided by the following principles:

- Transparency and fairness in the procurement process.
- Promotion of local economic development and community benefit.
- Support for social enterprises and initiatives that contribute to social welfare.
- Encouragement of innovation and the growth of new and small businesses.
- Adherence to environmental sustainability and ethical standards.
- Optimisation of value for money and cost-effectiveness.

## Local Sourcing

- Preference will be given to local suppliers, defined as those located within a 20-mile radius, for the procurement of goods and services whenever feasible and cost-effective.
- Local sourcing initiatives shall be implemented to stimulate economic growth, create local employment opportunities, and reduce the carbon footprint associated with transportation.

## Use of Social Enterprises

- Efforts shall be made to identify and engage with social enterprises, including those owned by marginalized or disadvantaged groups, in the procurement process.
- Social enterprises will be given fair consideration in bidding processes and awarded contracts based on their ability to meet quality, price, and delivery requirements.

## Supporting New and Small Businesses

- New and small businesses will be actively encouraged to participate in procurement opportunities.
- Measures such as simplified tendering procedures, capacity-building support, and mentoring will be implemented to facilitate the involvement of new and small businesses in procurement activities.
- Subcontracting opportunities shall be provided to new and small businesses as part of larger procurement contracts to promote their growth and development.



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## Business Continuity

We expect our suppliers to have a robust business continuity plan (BCP) in place which is to be reviewed and tested annually. The BCP must include, but should not be limited to:

- A robust risk assessment procedure for the identification of operational vulnerabilities that can cause loss of supply to customers
- An established and practiced emergency response process
- A customer notification process
- Clearly defined continuity contingency plans.

Suppliers with ISO 22301 certification or a comparable certification are deemed to satisfy our requirements.