



/ Ethical Procurement and Supply Policy
2022

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1. Introduction

Atalian Servest Limited and subsidiary companies (“**Atalian Servest**” or “**the Company**”) recognises the responsibility it shares with its suppliers to buy goods and services and deliver services in an ethical manner. Atalian Servest’s Ethical Procurement and Supply Policy is a key component to the commitment our business makes to responsible sourcing.

Atalian Servest wants its clients to be confident that the individuals who make its products are treated fairly, with respect for human rights and are not exposed to unsafe working conditions. The business believes that when ethical standards are in place, improvements can be made to worker wellbeing, productivity and quality, which benefits both the suppliers and clients. Only suppliers that share Atalian Servest’s standards and values will be considered appropriate to trade with Atalian Servest, and it seeks to develop long-term trading relationships with suppliers based on the principle of fair, open and honest dealings always. Atalian Servest upholds an ethos of working in partnership with the supply base to achieve the ethical standards declared within this document.

This policy represents Atalian Servest’s commitments to ethical trade. It will regularly review and, where necessary, update the policy to ensure it remains responsive to stakeholders’ expectations, business strategy and industry practice.

2. Defining Ethical Trade

A definition of ethical trade is provided by the Ethical Trading Initiative (“**ETI**”):

“Ethical trade means that retailers, brands and their suppliers take responsibility for improving the working conditions of the people who make the products they sell.

Most of these workers are employed by supplier companies around the world, many of them based in poor countries where laws designed to protect workers’ rights are inadequate or not enforced.

Companies with a commitment to ethical trade adopt a code of labour practice that they expect all their suppliers to work towards. Such codes address issues like wages, hours of work, health and safety and the right to join free trade unions.”

Source: <http://www.ethicaltrade.org/about-eti>

3. About Atalian Servest’s Ethical Procurement and Supply Policy

Atalian Servest’s Ethical Procurement and Supply Policy is in line with ETI Base Code, The Chartered Institute of Procurement and Supply (CIPS) and its own policies and procedures. This document sets out the standards that the Company expects to be in place throughout its supply chain. All suppliers are required to comply with this Ethical Procurement and Supply Policy.

Given the vast numbers of suppliers Atalian Servest engage with in the UK and internationally, the Company is unable to ethically assess every single supplier within its supply chain. Focus is prioritised on direct (‘tier 1’) suppliers.

By means of the vendor prequalification process and this policy, the supply base is required to ensure that its own supply chain meets industry practice and the requirements.

Atalian Servest is committed to ensuring that the issues highlighted in this policy are abided by. We will take every step possible, where it is financially viable, to support suppliers to create an ethical and sustainable supply chain.

4. What Atalian Servest Expect from Their Suppliers

Suppliers must ensure that they have read, understand and comply with this policy.

4.1 Modern Day Slavery

The prevention, detection and reporting of modern slavery in any part its supply chain is the responsibility of all those working for suppliers or under their control. Suppliers are required to avoid any activity that might lead to, or suggest, a breach of information outlined in this document.

Atalian Servest aims to encourage openness and will support anyone who raises genuine concerns in good faith as a result of this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery, of whatever form, is or may be taking place in any part of a suppliers' business or in any of their supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Suppliers are encouraged and required to:

- inform Atalian Servest immediately if it believes that it has suffered from any such treatment mentioned above;
- notify Atalian Servest as soon as possible if it believes or suspects that a conflict with this policy has occurred or may occur in the future;
- raise concerns about any issue or suspicion of modern slavery in any parts of its business or supply chains of any supplier tier at the earliest possible stage;
- notify Atalian Servest as soon as possible if it suspects or believes a breach of this policy has occurred;
- raise any concerns if it is unsure about a particular part of this policy;
- make Atalian Servest aware of potential mistreatment of workers more generally, or their working conditions within any tier of its supply chains and any of the various forms of modern slavery.

4.2 Working with our Suppliers to Combat Labour Mistreatment

The key principles of the ETI Base Code are accessible at ethicaltrade.org/resources/eti-base-code. The ETI Base Code will give suppliers an understanding of how we expect our suppliers to conduct themselves. Atalian Servest is committed to ensuring that there is no human trafficking or modern slavery in any part of its business or supply chain. It is important that people working in its business and supply chain work in safe, fair and legal conditions, and the Company will continue to make every effort to ensure that Atalian Servest and its suppliers act ethically and with integrity in all its business relationships.

Suppliers are encouraged and required to:

- read and understand the ETI Base Code;
- read and agree to our Modern Slavery Statement which outlines Atalian Servest's expectations for both staff and suppliers;
- inform Atalian Servest if suppliers are unsure about any principles outlined in the ETI Base Code or our Modern Slavery Statement before suppliers agree to adhere to it/them;
- let Atalian Servest know if suppliers need any support in trying to address any of the issues outlined in the ETI Base Code or our Modern Slavery Statement.

4.3 Conducting Business in an Ethical Manner

As well as working with suppliers that share our values and commitment in ensuring every effort is being taken to eradicate modern day slavery and labour mistreatment from supply chains, Atalian Servest wants to make sure that it is working with suppliers that conduct business practices in an ethical manner. This includes environmental impact, business integrity, corporate social responsibility and health & safety.

4.3.1 Health, Safety and Environment

Atalian Servest works tirelessly to provide a safe and healthy environment for all colleagues, suppliers, clients and visitors. This is achieved by ensuring that all employees are provided with the information, training and supervision they need to perform their job in a safe manner. The Company expects suppliers to take same approach.

Suppliers are encouraged and required to:

- provide consultation with employees on matters affecting health, safety and environment;
- provide information, instruction, training and supervision for employees in terms of role competence, health, safety and environmental management, risk, control and responsibilities;
- provide and maintain safe plant and equipment including suitable protective clothing;
- allocate sufficient resources for the implementation of health, safety and environmental standards;
- use materials and substances that are safe and can be used in a safe manner;
- provide suitable control of risks arising from work activities in terms of health, safety and welfare;
- prevent work related ill health and accidents.

4.3.2 Business Integrity

Atalian Servest wants to make sure every supplier and associated person acting for, or on behalf of, its business understands it is responsible for maintaining the highest standards of business conduct. Outlined below are Atalian Servest's expectations regarding business conduct. Any breach of the points outlined below is likely to constitute a serious contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

- Familiarise itself and comply with the Bribery Act 2010 and Atalian Servest's Anti-Bribery Statement which outlines its expectations for both staff and suppliers, including any future updates that may be issued from time to time by the Company.
- Reject any business practice which might reasonably be deemed improper.
- Never using its authority or position for its own financial gain.
- Make Atalian Servest aware of any personal interest that might affect, or be seen by others to affect, its impartiality in decision making.
- Ensure that the information it gives in the course of its work is accurate and not misleading.
- Striving for genuine, fair and transparent competition.
- Be truthful about its skills, experience and qualifications. Responsibly manage any business relationships where unethical practices may come to light and take appropriate action to report and remedy them.
- Make Atalian Servest aware if it has any concerns around the understanding of the points outlined above so the Company can support suppliers in enabling understanding.
- As an organisation Atalian Servest strives to comply with the provisions of ISO 27001. The Company expects suppliers to conduct its business in a way that recognises the importance of and seeks to prioritise information security. The Company will periodically audit compliance with the

confidentiality & data protection provisions the suppliers agree to adhere to when contracting with AtalianServest.

4.4 CIPS Corporate Code of Ethics

Atalian Servest has also committed to the Chartered Institute of Procurement and Supply's (CIPS) Corporate Code of Ethics. It is the Company's own recommendation that suppliers follow these guidelines.

Understanding and commitment

- Ensure consistent understanding of business ethics across the organisation at all levels.
- Continually enhance knowledge of all relevant laws and regulations in the countries in which the organisation operates, either directly or indirectly.
- Commit to eradicating unethical business practices including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour.

Ethical practice

- Conduct all business relationships with respect, honesty and integrity, and avoid causing harm to others as a result of business decisions.
- Treat all stakeholders fairly and impartially, without discrimination or favour.
- Actively support and promote corporate social responsibility (CSR).
- Avoid any business practices which might bring the procurement profession into disrepute.

Professionalism

- Use procurement strategies to drive unethical practices from the supply chain.
- Ensure procurement decisions minimise any negative impact on human rights and the environment whilst endeavouring to maximise value and service levels.
- Put ethical policies and procedures in place, regularly monitored and updated, and ensure compliance.
- Mandate the education and training of all staff involved in sourcing, supplier selection and supplier management to professional standards.
- Practise due diligence in all business undertakings.

Accountability

- Accept accountability and take ownership of business ethics.
- Foster a culture of leadership by example.
- Take steps to prevent, report and remedy unethical practices.
- Provide a safe environment for the reporting of unethical practices.

4.5 Prevention of the Facilitation of Tax Evasion

Atalian Servest requires that all suppliers shall, and shall ensure that any supplier group companies, employees or subcontractors shall:

- not engage in any activity, practice or conduct which would constitute either:
 - a UK tax evasion offence within the meaning of section 45(4) of the CFA 2017 ("UK Tax Evasion Offence");
 - a foreign tax evasion offence within the meaning of section 46(5) of the CFA 2017 ("Foreign Tax Evasion Offence");
 - a facilitation of UK Tax Evasion Offence within the meaning of section 45(5) of the CFA 2017;
 - a facilitation of Foreign Tax Evasion Offence within the meaning of section 46(6) of the CFA 2017; or

- failure to prevent a Facilitation Offence within the meaning of sections 45 or 46 of the CFA 2017
- have and maintain in place such policies and procedures as are reasonable to prevent the facilitation of tax evasion by another person, including employees of the supplier, the supplier group companies or any subcontractors).

5. Useful Links

The Ethical Trading Initiative (ETI) - <http://www.ethicaltrade.org>

ETI Base Code - <http://www.ethicaltrade.org/resources/key-eti-resources/eti-base-code>

UN Global Compact - <http://www.unglobalcompact.org/>

UN Guiding Principles on Business and Human Rights -
http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

Stronger Together - <http://stronger2gether.org/>



Daniel Dickson

Chief Executive Officer, UK and Ireland
Atalian Servest Limited