

POLICY

SIMBEC-ORION

Sustainable Procurement Policy

Owning Department:Corporate Governance

Approved Date:11 Mar 2025

Owning Sub-department:Not Applicable

Document Number:POL-00177

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## 1 PURPOSE AND SCOPE

Our Sustainable Procurement policy refers to the way we embed our sustainability objectives and principles into our procurement activities and the way we work with our Service Providers. This policy should be read in conjunction with other relevant company policies as described in our overarching Environmental, Social and Governance (ESG) Policy (POL-00214) and our Service Provided Code of Conduct (POL-00211).

## 2 DEFINITION

The term Service Provider within this document is used as an umbrella term to describe vendors, outsourcers, and suppliers.

## 3 ROLES AND RESPONSIBILITIES

### Senior Leadership Team

- responsible for ensuring the policy is current and is adhered to.

### Quality Assurance Team

- responsible for the Service Provider relationship in regard to gathering information deemed relevant for purposes of ESG commitment and making this information available to the relevant procurer. TEMP-01380 Environmental Social Governance Service Provider Questionnaire issued to service providers as appropriate.

## 4 POLICY

### 4.1 KEY ELEMENTS OF OUR SUSTAINABLE PROCUREMENT POLICY

Our policy has the following four key elements:

1. Encouraging our Service Providers to adopt a responsible approach to business
2. Upholding business ethics in our dealing with Service Providers
3. Managing and reducing the environmental impacts of what we buy
4. Upholding human rights in our supply chains

The key to achieving compliance with these elements rests in our Supplier code of conduct which is available on our website.

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**Status:** Approved  
**Version:** 1.0

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#### 4.1.1 SUSTAINABLE AND RESPONSIBLE APPROACH TO BUSINESS

We are committed to working with our Service Providers on a journey of continuous improvement towards sustainability goals and we strongly believe this will benefit us, our Service Providers, our Clients, and all communities where we operate. We aim to have as many as possible of our key service providers sign up to our Supplier Code of Conduct (POL-00211). Our risk based approach focuses on service providers in Category 1 (WI-00392 Requesting a contract for Service Providers) which by definition have the greatest impact on our business from a risk and volume perspective.

We will also continually engage with our Service Providers during the procurement lifecycle on sustainability issues and opportunities. We will incorporate sustainability considerations into the service provides selection process where appropriate.

#### 4.1.2 UPHOLDING BUSINESS ETHICS DEALING WITH SERVICE PROVIDERS

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls.

We apply policies and ethics to all our procurement activities. This requires all involved in procurement to:

- Avoiding Conflicts of Interest
- No exploiting of Corporate Opportunities for personal gain
- Fair dealing with Service Providers
- No Insider Trading
- Maintaining Confidentiality
- Protection and Proper Use of Company Assets
- Compliance with applicable Laws, Rules and Regulations
- No Discrimination

We expect the same high standards from all of our contractors, Service Providers, and other business partners, and we expect they will hold their own Service Providers to the same high standards of business conduct and ethics.

We are committed to ensuring that our representatives act responsibly in the territories in which they operate.

Our representatives shall comply with all applicable laws, including those relevant to countering bribery and corruption in the jurisdictions in which they operate.

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**Version:** 1.0

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Our Anti-Bribery and Corruption Policy (POL-00006) sets out our approach, and all those involved with Procurement are expected to abide by this policy in their dealings with Service Providers.

#### 4.1.3 MANAGING AND REDUCING ENVIRONMENTAL IMPACTS OF WHAT WE BUY

We recognise the need to protect the natural environment for a sustainable future. We seek to minimise and reduce our own environmental impacts.

In turn we seek to manage and reduce the environmental impacts of what we buy (goods and services) and to encourage our Service Providers to minimise their impacts. This means explicitly considering lifecycle resource usage, waste and emissions at the start of the procurement activity where the most impact can be made.

In particular we will:

- Review whether a purchase is really necessary or whether existing goods and assets can continue to be used.
- Request our Service Providers to ensure compliance with all applicable environmental legislation.
- Seek to purchase goods and services which are low impact, and use sustainably sourced materials, including recycled content where possible.
- Assess where goods we buy are designed to last and can be re-used or recycled at the end of their service life.
- Incorporate environmental impact considerations into the service provides selection process where appropriate.

#### 4.1.4 UPHOLDING HUMAN RIGHTS IN OUR SUPPLY CHAINS

Our responsibilities to protecting people extend beyond our own employees to our clients/ customers, partners, and Service Providers. We have a duty of care to protect people's health and safety where we work, and to flag human rights issues where we become aware.

We will seek to ensure that our Service Providers treat their own employees fairly through responsible employment contracts and fair labour practices, with supporting policies and practices.

We have a zero-tolerance approach to Modern Slavery. Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

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We are committed to ensuring modern slavery is not taking place anywhere in our supply chains. We will take steps to identify risks of modern slavery and in particular focus on high risk procurement categories such as:

- Catering and food supplies
- Facilities management and cleaning services
- Construction and maintenance services
- Temporary Labour

We expect the same zero tolerance of Modern Slavery from all of our contractors, Service Providers and other business partners, and we expect that our Service Providers will hold their own Service Providers to the same high standards and alert us of risks they have uncovered in their supply chains.

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5REFERENCES

Document Number	Document Title
POL-00006	Anti-Bribery and Corruption Policy
SOP-00447	Service Provider Process
POL-00182	Equality Diversity and Inclusion policy
POL-00172	Global Whistleblowing Policy
POL-00086	Occupational Health and Safety Policy Safety Policy Introduction
POL-00002	Information & Security Policy
POL-00214	Environmental, Social and Governance (ESG) Policy
POL-00211	Service Provided Code of Conduct
TEMP-01380	Environmental Social Governance Service Provider Questionnaire

6PREVIOUS VERSION HISTORY

Previous Version	Current Version	Details of change
N/A	1.0	First version of this policy

Document Approvals  
Approved Date: 11 Mar 2025

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