

Every year The Freedom Group of Companies Limited ('Freedom') procures a significant quantity of services and supplies. With this comes a responsibility to ensure that we incorporate ethical, environmental and social considerations into our spending decisions. This Responsible Procurement Charter (RPC) formalises Freedom's strategy to place sustainability and corporate social responsibility at the core of its procurement needs and to encourage our supply chain partners to do likewise.

Under the charter, through a continuous improvement process, Freedom strives to achieve best practice in responsible purchasing to meet the needs of its customers and employees and to work accordingly with responsible sub-contractors and suppliers.

Health & Safety

Freedom has adopted a zero harm policy including occupational health screening and all its actions are predicated on providing a safe and healthy working environment for employees, sub-contractors, suppliers and all others who may be affected by our activities in accordance with relevant law and standards.

We aim to provide staff with all the necessary training, equipment and work methods to achieve the highest level of health and safety performance.

We expect our supply chain to adopt and maintain similar standards and to comply with all relevant legislation, including CoSHH, REACH and RoHS.

Service providers working on our sites are expected to respect Freedom's health and safety rules and culture; to fully participate in safety forums and our measures to drive continual improvement in risk/hazard reduction.

Environment and Sustainability

Freedom is committed to manage our activities to avoid any risk of a pollution incident and minimise any adverse impacts on the environment. We also work hard to reduce waste, emissions and the use of natural resources. We support smart technology and innovative methods to help us achieve this aim.

As a minimum we expect our sub-contractors and suppliers (and their own supply chain) to comply with all local and national environmental legislation, regulations and our own policies to protect the environment. Sub-contractors and suppliers should have action plans in place to manage and reduce their environmental impacts specific to the products or service they provide.

We expect our sub-contractors to understand any biodiversity risks and enhance biodiversity on sites where possible.

We expect our suppliers to be committed to respecting restrictions or bans on materials under various regulations and to ensure that materials and products delivered to Freedom have a non-controversial origin and are correctly traceable, particularly raw materials. In addition, 100% of timber supplied must be certified FSC (Forest Stewardship Council) or PEFC (Programme for Endorsement of Forest Certification).

Initiatives such as reducing packaging, using materials with high recycled content and local sourcing are sought and encouraged. We also encourage our supply chain to obtain ISO 14001 certification.

Employment

As a responsible employer Freedom is committed to promoting equal opportunities within our organisation and supply chain and will not discriminate on the basis of race/ethnicity, disability, religion/belief, age, sexual orientation and gender.

We strive to ensure that our employees are treated respectfully and equally, in full respect of their individual rights and freedoms, and to encourage their involvement and development (both professional and personal) within our company.

We have a zero tolerance policy on modern slavery in our own business and in our supply chain. Freedom complies with the Modern Slavery Act 2015 and prohibits the use of forced or compulsory labour and demands that our supply chain also complies with all applicable legislation.

Freedom expects our suppliers to show a similar commitment to respect their employees' rights and their well-being at work, particularly with regard to the following areas:

- Prohibit illegal employment (including child and forced labour), hiring personnel illegally or without declaring their employment to the relevant authorities
- Comply with all regulations relating to minimum wage, maximum working times and provision of welfare
- Non-discrimination and promotion of equal opportunities
- A proactive policy in keeping employees free from harm
- Ensuring that employees have the training and qualifications necessary to perform their duties
- Treating employees fairly and with respect, having non-tolerance policies relating to verbal, physical and other forms of abuse.

Bribery and Corruption

Freedom wishes to conduct business with honesty and integrity in accordance with high ethical and legal standards and to comply with all relevant legislation and regulations. We prohibit the use of bribery and corruption to advance business objectives and have a zero tolerance policy to sub-contractors and suppliers engaging in commercial bribery or offering any inappropriate incentive to our employees (including family and friends) in order to gain or retain Freedom business.

For the protection of the supplier and the individuals concerned, suppliers should seek to avoid, as far as practicable, any possible conflict of interest between themselves and Freedom. For instance, if a supplier employee is a family relation or has a close association with a Freedom employee, the supplier should disclose this fact and take action to avoid any possible conflict.

Freedom considers compliance with applicable laws and regulations to be absolutely crucial when entering into supply relationships and we expect our supply chain to adopt a similar high level of business ethics, particularly with regard to the following:

- Complying with our RPC, the Bribery Act 2010 and similar local legislation
- Fulfilling their agreed contractual obligations
- Establishing procedures for business relations with their other clients and suppliers with regard to potential conflicts of interest
- Having a policy of not accepting or issuing unwarranted payments or incentives and rooting out all forms of corruption

Social Responsibility

When procuring goods and services Freedom aims, where possible, to ensure that economic and social benefits flow to local communities and businesses. Freedom looks to form constructive trading relationships with local organisations so that local communities feel a direct benefit from our expenditure. We work together with our clients and on our own behalf to contribute to community projects.

Freedom's Commitments to our Supply Chain

Freedom recognises that our subcontractors and suppliers play a key role in the success of our business. We therefore consider it is important to confirm our commitment to act fairly and ethically in our procurement activity with them. As such we will:

- Apply purchasing methods that encourage genuine competition between suppliers and will select our suppliers in an impartial manner.
- Treat our suppliers with honesty and respect and provide sufficient feedback should they be unsuccessful in a bid situation. In the case where a supplier makes an obvious error in pricing or transactions, which may be detrimental to future trade relations, we will advise the supplier, even if this impacts on Freedom's short term interests.
- Refuse to accept any reward or any kind of gift (other than those of a nominal value) from any supplier or service provider to favour them over another.
- Protect the confidentiality of the non-public information and data of our suppliers.
- Favour suppliers who offer innovative and sustainable solutions to our needs.

Supply Chain Requirements

It is very important to Freedom that all of our service providers and suppliers, together with their subsidiaries and their own suppliers, no matter which country they are based in, respect the ethical, social and environmental requirements that we consider to be fundamental and essential to ensure a good working relationship between us. The Freedom Responsible Purchasing Charter presents the commitments we require from our supply chain and we expect them to consent to assessment and audit by Freedom to ensure compliance with the principles and commitments of the RPC and we will work together to define any necessary action plans to address any non-conformances.

Freedom values its relationships with our sub-contractors and suppliers and their efforts to aid us in our business objectives. We seek their assistance in continuous improvement to our procurement processes and outcomes and in return we will honour our commitments to them.