

## Introduction

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 legal, ethical, environmental and social considerations into our spending decisions. This Responsible Procurement Charter formalises Freedom's strategy to place sustainability 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

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 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. It is estimated, that globally 40% of plastic is used for packaging. We are committed to working with our suppliers and subcontractors, with the aim of reducing non-essential and non-recyclable single-use plastic waste. We expect our supply chain to endeavour to use alternative products to replace plastics and encourage the re-use or recycling of packaging wherever possible and help us quantify the weight of plastic packaging.

### **Sustainability**

Freedom supports the UN Sustainable Development Goals, the 17 goals to support innovation, tackle climate change, inequality and responsible consumption and production. Our key priority Sustainable development goals are: Industry, Innovation and Infrastructure, Decent Work and Economic Growth, Climate Action, Reduced Inequalities and Partnerships for Goals.

We are encouraging our suppliers to do the same. In partnership with Support the Goals we review how our key Supply Chain partners publicly communicate their support for the Sustainable Development Goals and provide advice. The aim is to help us build stronger partnerships to benefit our environment and communities.

### **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.

### **Fraud, Deception and Dishonesty**

Freedom is committed to adhering to high operating standards and complying the law in respect of the prevention of financial crime including bribery, tax evasion and money laundering.

Freedom will protect the Group against fraud and will not defraud or deceive anyone or act dishonestly. In maintaining our high standards, we will not evade tax or enable others to do so. Not only is there a legal requirement to prevent the facilitation of tax evasion and other types of financial crime, we expect our suppliers to comply with the law and maintain high standards.

Fraud involves someone deliberately deceiving, acting dishonestly or abusing their position to gain any kind of material advantage, or use or involve anyone else to do so. Tax evasion is a type of fraud which involves the illegal non-payment or underpayment of taxes that are owed by law to HMRC or other international Revenues. Freedom does not tolerate tax fraud within its business or by its business partners. Further, Freedom will never knowingly be complicit in facilitating a third party to evade taxes. Our enhanced due diligence and payment procedures are designed to ensure we comply with such laws. Freedom expects that its business partners will both follow and hold their own suppliers to the same high standards.

### **Counterfeit, Fraudulent, and Suspect Items (CFSI)**

Freedom recognises that counterfeiting is a serious global problem that affects companies worldwide and that there are parties who may seek to substitute CFSI for genuine items or services for commercial gain. Freedom endeavours to make all employees and partners aware of the risks of CFSI. To help prevent the purchase of counterfeit, suspect or unapproved products, our Procurement department only allow the use of approved suppliers and sub-contractors. To continually verify vendor quality, we carefully monitor the ongoing performance of all suppliers utilising a variety of criteria, including desk top audits and monthly review meetings.

### **Money laundering**

Freedom will never knowingly be complicit in laundering money and will report any suspicion of money laundering or other serious organised crime to the appropriate authorities. Money laundering is a process used for transferring cash generated by organised crime into the financial system and the legitimate economy. It is used to disguise the origins of illegal cash by turning it into an investment in a legitimate financial instrument or business. Although Freedom is not directly subject to the Money Laundering Regulations, we still support the principles of the regulation.

### **Bribery and Corruption**

Freedom prohibits bribery and corruption in all its forms. This applies to all our employees, temporary employees, contractors and agents, wherever they are in the world.

Bribery is the offering, giving, soliciting or accepting something of value as a reward for something illegal, unethical or a breach of trust. Bribes can include, but are not limited to, cash, gifts, hospitality, in-kind help, charitable donations or employing of relatives.

They are usually, but not always, used to obtain or retain an unfair business advantage. Bribes are against the law and against our principles, regardless of local customs. Corruption is the abuse of entrusted power for private gain. It can involve bribery, extortion, deception, fraud, collusion and money laundering. Freedom expects that its business partners will both follow and hold their own suppliers to the same high standards.

### Facilitation payments

We do not allow any taking, offering, providing, or promising of unlawful 'facilitation payments', regardless of the value of the payment.

A facilitation payment is a type of bribe - unofficial payments that are either demanded, offered or made usually to speed up a process or action – for example, the issuing of permits or licences. They are often referred to as 'bungles', 'backhanders' or 'grease payments'. Such payments, even when small in value, are illegal and are strictly prohibited. Freedom expects that its business partners will both follow and hold their own suppliers to the same high standards.

### Conflicts of interest

We avoid situations in which our personal interests or actions could conflict with Freedom's best interests. All our employees have a duty to avoid financial, business or other relationships which might be opposed to Freedom's interests, or which conflict with the performance of an employee's duties. Employees are expected to conduct themselves in a manner that avoids even the appearance of such a conflict. Such interests might include but are not limited to:

- Having a financial interest (e.g. a shareholding) in a company with which Freedom has a commercial relationship;
- Acting as a director or employee for another business with which Freedom has a commercial relationship;
- Placing business with a company owned or controlled by a Freedom employee.
- Where there is any potential conflict, for instance, if a supplier employee is a family relation or has a close association with a Freedom employee, the business partner 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 legal compliance and business ethics, particularly with regard to the following:

- Complying with our Responsible Procurement Charter, the Bribery Act 2010, Financial Crime Act 2017, 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
- Actively managing conflicts of interest and rooting out all forms of corruption as noted above.

### 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 our service providers and suppliers, together with their subsidiaries and their own suppliers respect the ethical, social and environmental requirements that we consider to be fundamental to ensure a good working relationship between us.

Our Responsible Procurement Charter sets out the key commitments we require from our supply chain 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.