Document Owner	Head of Supply Chain	
Core/Hub	Hub Supply Chain	
Prepared By	Billy Mallinson – HOSC	
Reviewers	N/A	N/A
Approved By	N/A	N/A
Quality Approval *(Mandatory for Core Documents)*	N/A	N/A

Contents

Contents 2
1. PURPOSE AND APPLICATION 3
2. POLICY STATEMENT 3
2.1. Introduction 3
2.2. Health and Safety 4
2.3. Drugs and Alcohol 4
2.4. Ethical Business Practices 4
2.5. Accounting and Business Records 5
2.6. Employment 5
2.7. Information Security 6
2.8. Prompt Payment 6
2.9. Environment 6
2.10. Community Engagement 6
2.11. Conflicts of Interest 6
2.12. Reporting 7
2.13. SEA and Cohort Policies 7
3. RESPONSIBILITIES 7
4. GOVERNANCE 8
5. MONITORING, REVIEW AND EFFECTIVENESS 8
6. RELATED DOCUMENTS, RECORDS AND PROCESSES 8
7. DEFINITIONS 8
8. DOCUMENT CONTROL 8

1. PURPOSE AND APPLICATION

This policy sets out SEA's responsible procurement expectations for suppliers, subcontractors, agents and other third parties providing goods, services, plant hire or products to SEA. It defines the ethical, legal, safety, environmental, employment, information security and reporting standards that suppliers are expected to meet when working with or on behalf of SEA.

2. POLICY STATEMENT

SEA is committed to responsible procurement and expects all suppliers, subcontractors, agents and third parties to conduct business ethically, safely, sustainably and in compliance with applicable legal, regulatory, environmental, employment, information security and human rights requirements.

2.1. Introduction

This procurement policy presents the basic principles expected when working with System Engineering & Assessment Ltd (SEA). SEA seeks to be a responsible buyer of goods and services and sets high standards to ensure that business is conducted ethically, sustainably and within the laws of the countries in which SEA operates.

SEA expects suppliers to comply with all applicable local, national and international laws and regulations, including requirements set by relevant regulatory bodies, and to respect internationally recognised human and labour rights. For the purposes of this policy, the term supplier includes subcontractors, agents, suppliers of goods, suppliers of services, plant hire providers and suppliers of products.

2.2. Health and Safety

SEA has achieved ISO 45001:2018 Occupational Health and Safety accreditation and believes that all accidents are preventable; therefore, work must be undertaken safely and responsibly, or not at all.

All SEA employees, representatives and those working on SEA's behalf have a responsibility to ensure that operations are undertaken in a way that prevents accidents, injuries and ill health, while also protecting the environment in which they work.

SEA aims to provide staff with the training, work methods and equipment necessary to achieve the highest level of health and safety performance. SEA expects suppliers to comply with health, safety, environmental and quality legislation.

Suppliers working on SEA sites are expected to respect SEA operational business requirements, including behavioural safety initiatives. Where necessary, SEA will seek evidence that suppliers are working towards SEA's stated zero harm goals.

2.3. Drugs and Alcohol

SEA is committed to maintaining healthy, safe and productive working conditions throughout its activities. SEA recognises that alcohol and drugs can affect an individual's ability to work safely and correctly and therefore aims to provide an environment free from the misuse of drugs and alcohol.

SEA operates a strict drugs and alcohol policy, referenced as policy POL-HR-011, which must be adhered to. All subcontractors and suppliers must be aware of the requirements of the policy and the severe implications of failing to comply.

2.4. Ethical Business Practices

SEA business must be carried out with integrity, trust, respect and honesty at all times. Suppliers must comply with the Bribery Act 2010 and with local laws against bribery of state officials.

Suppliers must not engage in any form of commercial bribery or kickback, and must not offer any inducements to any SEA employee, or to their family or friends, in order to win or retain SEA business.

Suppliers must keep current and accurate written accounts of all payments, including gifts, meals, entertainment and anything of value, made on behalf of SEA or from funds provided by SEA. Suppliers must make a copy of such transactions available upon request.

For further clarification, suppliers should refer to the Cohort Group Anti-Bribery and Anti-Corruption Policy, which SEA adheres to.

The Modern Slavery Act 2015, together with individual human rights policies, will be implemented across SEA's supply chain in a non-discriminatory manner. Particular attention shall be given to the rights and needs, as well as the challenges and risks, faced by individuals from groups or populations that may have an increased chance of becoming vulnerable or marginalised.

In accordance with section 54 of the Modern Slavery Act 2015, SEA's parent company, Cohort Plc, issues an annual Modern Slavery Statement detailing how the group mitigates risk and reports these issues.

The SEA supply chain shall adhere to the requirements set out in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which details how companies within a supply chain must operate to prevent the use of conflict minerals, namely tungsten, tin, tantalum and gold.

SEA supplies products both directly and indirectly into the United States, along with companies that are registered with the United States Securities and Exchange Commission, all of which must comply with the Final Rule. As a responsible supplier, SEA has committed to support this legislation and requires its supply chain to monitor their suppliers to ensure that conflict minerals are not used in products supplied to SEA.

2.5. Accounting and Business Records

Accurate and reliable information and records are critical to meeting this policy's principles, SEA's financial, legal and management obligations, and the requirement to fairly reflect SEA's transactions.

The supplier and SEA must keep accurate records of all matters related to the supplier's business with SEA.

2.6. Employment

As outlined in SEA's Equality Policy, referenced as POL-HR-002, SEA is committed to eliminating discrimination within the workforce. The objective is to create a working environment in which there is no unlawful discrimination and where all decisions are based on merit.
Discrimination is unlawful when it takes place on one of the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

SEA expects all businesses in its supply chain to respect the people they employ directly or indirectly and to provide a safe workplace that is free from harm, intimidation, harassment or fear.

SEA also expects businesses to ensure that working hours are not excessive and comply with national laws or benchmark industry standards, whichever affords the greater protection.

SEA believes that paying a decent wage is good for the people who work for SEA and makes good business sense. SEA encourages suppliers to pay fair market rates for all trades and disciplines, whether site based or office based.

2.7. Information Security

Suppliers must protect confidential information belonging to, or vested in, SEA in accordance with all relevant laws, and must act to prevent its misuse, theft, fraud or improper disclosure.

SEA is committed to complying fully with the principles of the General Data Protection Regulation, GDPR, and requires all suppliers to comply with the requirements set out in the regulation.

Suppliers must take due care when handling, discussing or transmitting sensitive or confidential information that could affect SEA, its employees, its customers, the business community or the public. This obligation continues after the supplier's assignment or contract with SEA has expired.

2.8. Prompt Payment

SEA will pay suppliers in accordance with existing agreed payment terms while also adhering to the requirements stated in the UK government's PPN 04/19 Prompt Payment Policy.

Outstanding monies arising from disputes or complaints will be dealt with using SEA's terms and conditions and processes.

Throughout SEA's supply chain, SEA expects suppliers to pay their own suppliers in accordance with fair and reasonable terms in a similar manner.

2.9. Environment

SEA makes every effort to minimise emissions, waste and unnecessary use of natural resources by reusing and recycling materials. SEA actively promotes sustainable materials and solutions using the guiding principles of reduce, reuse and recycle.

SEA's commitment to these principles is demonstrated by its ISO 14001:2015 accreditation.

SEA actively promotes energy efficiency measures for its clients and customers and supports increasing the use of products from sustainable and renewable resources. SEA encourages suppliers to measure, manage and reduce their carbon footprint.

2.10. Community Engagement

SEA recognises the importance of engaging with small and medium enterprises and local communities in the work it carries out.

SEA encourages suppliers to engage with local communities and wider local or regional business partnerships to promote and appoint apprentices and management trainees.

2.11. Conflicts of Interest

Suppliers should avoid any interaction with SEA employees that may conflict, or appear to conflict, with an employee acting in the best interests of SEA.

Suppliers must not employ or otherwise make payments to any SEA employee during the course of any business transaction, other than pursuant to the SEA contract.

If a supplier employee is a family relation of any SEA employee, or if the supplier has any other relationship that might represent a conflict of interest, the supplier must disclose this fact to SEA and ensure that any SEA employee also does so.

2.12. Reporting

Suppliers who believe that a SEA employee, or anyone acting on behalf of SEA, has engaged in illegal or otherwise improper conduct, must report the matter to SEA.

Suppliers must also report any potential violation of this policy. A supplier's relationship with SEA will not be affected by an honest report of potential misconduct.

SEA's parent company, Cohort Group, is committed to the highest ethical standards. To support this, Cohort operates Safecall in the UK, a confidential reporting line which employees and suppliers are encouraged to use to report any concerns they may have over the ethical standards of individuals, teams or subsidiaries within the group.

2.13. SEA and Cohort Policies

This policy shall be read in conjunction with SEA and Cohort Plc policies and guidelines as they are introduced and amended from time to time.

Further information should be sought from the individual operating business as appropriate.

3. RESPONSIBILITIES

Job Title / Role	Responsibility Overview
Head of Supply Chain	Owns this policy and ensures responsible procurement expectations are defined, maintained and communicated through appropriate supply chain routes.
Supply Chain Team	Applies the policy when engaging suppliers, raising procurement requirements, managing supplier relationships and escalating concerns or non-compliance.
Suppliers and Subcontractors	Comply with the responsible procurement requirements and cascade relevant expectations to their own workforce, subcontractors and supply chain where applicable.
Quality, HSE, HR, Finance and Information Security Functions	Support policy application by providing subject matter guidance relating to compliance, safety, employment, payment, environmental, data protection and security requirements.

4. GOVERNANCE

Governance of this policy is maintained through the Supply Chain function, with support from relevant functional owners for specialist requirements such as health and safety, environment, quality, human resources, finance, legal, information security and data protection. Supplier compliance concerns, conflicts of interest, suspected unethical conduct or other policy breaches must be escalated through appropriate management, contractual or confidential reporting routes.

5. MONITORING, REVIEW AND EFFECTIVENESS

Policy effectiveness will be monitored through supplier engagement, procurement reviews, supplier performance activity, audit outputs, reported concerns, corrective actions and feedback from relevant business functions. The policy shall be reviewed periodically to ensure it remains aligned with legislation, SEA and Cohort requirements, customer expectations and recognised responsible procurement practice.

6. RELATED DOCUMENTS, RECORDS AND PROCESSES

Reference/Document number	Title
POL-HR-011	SEA Drugs and Alcohol Policy
POL-HR-002	SEA Equality Policy
Cohort Group Policy	Anti-Bribery and Anti-Corruption Policy
Cohort Group Statement	Modern Slavery Statement
ISO 45001:2018	Occupational Health and Safety Management Systems
ISO 14001:2015	Environmental Management Systems

7. DEFINITIONS

Term/Acronym	Definition
BMS	Business Management System.
QMS	Quality Management System.
Supplier	Any organisation or individual providing goods, services, plant hire or products to SEA, including subcontractors and agents.
Conflict Minerals	Tungsten, tin, tantalum or gold where sourcing may contribute to conflict or human rights abuses.

8. DOCUMENT CONTROL

The document control table records the transfer of the previous Responsible Procurement Charter into the new BMS/QMS template format.

Version Number	Issue Date	Summary of Changes
1	02 Sep 2026	First Issue transferred from procurement charter – template update and taxonomy only.