

**SUPPLY CHAIN NOTICE N0248****RESPONSIBLE PROCUREMENT CHARTER****CHANGE HISTORY**

issue	date	authorised by	authority	comment
1	Oct 22	Ben Smith	Supply Chain manager	First formal issue

## **1 INTRODUCTION**

This responsible procurement charter presents some basic principles expected when working with System Engineering & Assessment Ltd (SEA).

SEA seeks to be a responsible buyer of goods and services. We set high standards to ensure that all our business is conducted ethically, sustainably and within the laws of the country that we operate in. We expect our suppliers to comply with all applicable local, national, international laws and regulations (including regulatory bodies) and to respect internationally recognised human and labour rights. Note that the term 'supplier' includes sub-contractors, agents, suppliers of goods, services, plant hire, as well as products.

## **2 HEALTH AND SAFETY**

SEA has achieved the ISO45001:2018 Occupational Health & Safety accreditation and believes that all accidents are preventable so we do everything safely and responsibly - or not at all. All SEA employees, representatives and those working on our behalf have a responsibility to ensure that all operations are undertaken to ensure the prevention of accidents, injuries and ill health as well as protecting the environment in which they work.

We aim to provide staff with the training, work methods and equipment necessary to achieve the highest level of health and safety performance. We expect our suppliers to comply with health safety environment and quality legislation.

Suppliers working on our sites are expected to respect SEA operational business requirements in respect of behavioural safety initiatives and where necessary we will seek evidence that our suppliers are working towards our stated goals for zero harm.

## **3 DRUGS AND ALCOHOL**

SEA is committed to maintaining healthy, safe and productive working conditions throughout its activities. We recognise that alcohol and drugs have an impact on an individual's ability to work safely and correctly and, as such, aim to provide an environment free from the misuse of drugs and alcohol. SEA operates a strict drugs and alcohol policy (See policy N0104 for more information) which must be adhered to. All subcontractors and suppliers must be aware of the requirements and the severe implications of failing to comply.

## **4 ETHICS BUSINESS PRACTICES**

The business of SEA should be carried out with integrity, trust, respect and honesty at all times. Suppliers must comply with the Bribery Act 2010, plus local laws against bribery of state officials. They must not engage in any form of commercial bribery or 'kickback,' or offer any inducements to any SEA employee, their family or friends, in order to win or retain SEA business. Suppliers must keep current, accurate written accounts of all payments (including gifts, meals, entertainment and anything of value) made on behalf of, or from funds provided by SEA and will make a copy of such transactions available upon request. For further clarification please refer to the Cohort Group Anti-Bribery and Anti-Corruption Policy which SEA adheres to.

The Modern Slavery Act 2015, as well as individual human rights policies, will be implemented across our supply chain in a non-discriminatory manner. This will be made with particular attention 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 marginalized. 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 the risk and reports these issues.

The SEA supply chain will adhere to the requirements set out in Section 1502 of the Dodd's 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 (tungsten, tin, tantalum or gold). SEA supplies products both directly and indirectly into the US, along with companies that are registered with the US SEC, all of whom have to comply with the Final Rule. As a responsible supplier, SEA have committed to support this legislation, and as a result require our supply chain to monitor their suppliers to ensure that conflict minerals are not used in products supplied to us

## **5 ACCOUNTING & BUSINESS**

Accurate, reliable information and records are critical to meeting our charter principles plus all financial, legal and management obligations, and 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.

## **6 EMPLOYMENT**

As outlined in SEA's Equality policy (Ref: N0108) we are committed to eliminating discrimination amongst the workforce. The objective is to create a working environment in which there is no unlawful discrimination and all decisions are based on merit.

Discrimination is unlawful when it takes place on one of the following grounds (the 'protected characteristics') Age, Disability, Gender re-assignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex and Sexual orientation.

We expect all businesses in our supply chain to respect the people they employ directly or indirectly and offer a safe workplace that is free from harm, intimidation, harassment or fear in line with SEA's Employment policy (Ref: N0106). Furthermore we expect that businesses will ensure that working hours are not excessive and comply with national laws or benchmark industry standards whichever affords the greater protection.

In addition we believe that paying a decent wage is good for the people who work for us; which makes good business sense too. We encourage our suppliers to pay fair market rates for all trades and disciplines whether site or office based.

## **7 INFORMATION SECURITY**

Suppliers should protect confidential information belonging to or vested in SEA in accordance with all relevant laws, and 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 of its suppliers to comply with the requirements set out in the regulation. Suppliers must take due care in handling, discussing or transmitting sensitive or confidential information that could affect SEA, its employees, its customers, the business community or the public, even after their assignment or contract with SEA has expired.

## **8 PROMPT PAYMENT**

SEA will pay suppliers in accordance with existing agreed payment terms whilst also adhering to the requirements stated in the UK government's PPN 04/19 Prompt Payment Policy. Please note that outstanding monies as a result of disputes or complaints will be dealt with using SEA's terms & conditions and processes. Throughout our supply chain we expect that our suppliers pay their suppliers in accordance with fair and reasonable terms in a similar manner.

## **9 ENVIRONMENT**

SEA makes every effort to minimise our emissions, waste and unnecessary use of natural resources by reusing and recycling materials. We actively promote sustainable materials and solutions, using our guiding principles: reduce, reuse, and recycle. Our commitment to these principles is shown by our ISO14001:2015 accreditation.

SEA actively promotes energy efficiency measures for its clients and customers and increasing the use of products from sustainable and renewable resources. We encourage our Suppliers to measure manage and reduce their carbon footprint.

## **10 COMMUNITY ENGAGEMENT**

SEA understands the importance of engaging with small, medium enterprises and local communities on the work we carry out. In turn, we encourage our suppliers to engage with the local community and wider local / regional business partnerships to promote and appoint apprentices and management trainees.

## **11 CONFLICTS OF INTEREST**

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

Suppliers should 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 to any SEA employee, or if the supplier has any other relationship that might represent a conflict of interest, the supplier should disclose this fact to SEA and ensure that any SEA employee does so.

## **12 REPORTING**

Suppliers who believe that a SEA employee, or anyone acting on behalf of SEA, has engaged in illegal or otherwise improper conduct, should report the matter to SEA. Suppliers similarly should report any potential violation of the charter. A supplier's relationship with SEA will not be affected by an honest report of potential misconduct. SEA's parent company the Cohort Group is committed to the highest ethical standards. To support this, Cohort operates Safecall in the UK, a confidential reporting line which employees/suppliers are encouraged to use to report any concerns they may have over the ethical standards of individuals, teams or subsidiaries within the Group.

### **13 SEA & COHORT POLICIES**

This responsible supplier charter shall be read in conjunction with various SEA & Cohort Plc policies and guidelines as they are introduced and amended from time to time. Please seek further information from the individual operating business as appropriate.