

THE POLICY

1 Introduction

Omega Supplies Ltd take social and environmental factors into consideration alongside financial factors in making decisions on the purchase of goods and the commissioning of services. Our purchasing decisions should, where practicable, will not just consider the whole life cost and the associated risks and implications to our suppliers and end customers, but also the full implications for the whole of society and the environment.

Omega Supplies Ltd recognises that our procurement policy can make a significant contribution to our goals of sustainable economic development and resource minimisation by ensuring that the goods and services we buy consider optimum environmental performance.

Equally, Omega Supplies Ltd recognise that our procurement has an additional role to play in minimising any risk of social exploitation within the supply chain. We believe that this not only makes business sense, it also has the potential to improve the living and working standards of people around the world.

The policy standards set out below detail the requirements and minimum expectations of our policy for sustainable and ethical procurement. Specifically, it addresses the expectation that our staff and suppliers have a natural respect for our ethical standards in the context of their own particular culture, and that relationships with our suppliers are based on the principle of fair and honest dealings at all times.

The same principle of fair and honest dealings must be extended to all others with whom our suppliers do business, including employees, sub-contractors, and other third parties and their local communities.

1.1 Our Policy

This ethical supply chain policy seeks to cover the ethical issues and social responsibility within supply chains when managing business to business supplier relationships and the purchasing of goods and services from our suppliers.

We seek to uphold the principles of this policy as a shared responsibility between Omega Supplies Ltd and its suppliers, and the policy is therefore adopted at director level as well as within our purchasing, manufacture and distributing and customer support teams within the company. Omega Supplies Ltd expects, and seeks to assist and instil, a similar level of responsible ethical commitment within its own suppliers and customers.

All Omega Supplies Ltd staff and agents involved in the procurement of goods and services have a responsibility to be aware of and have a thorough understanding of the ethical issues referred to in this policy.

1.2 Objectives

1.2.1 Sustainable Procurement

Omega Supplies Ltd's sustainability objective is to ensure a continuous improvement in procurement decisions measured against delivering sustainable and ethical trading. More specifically, we seek to avoid adverse social and environmental impact in the supply-chain, wherever possible, to eliminate or reduce the environmental impact from service operations and the purchase of products to meet the prevalent recognised environmental standards of sustainability.

1.2.2 Ethical Procurement

Omega Supplies Ltd's ethical objective is to ensure that people in their supply-chain are treated with respect and have the appropriate rights with regard to employment including the rights to freely choose employment, freedom of association, payment of a living wage, working hours that comply with national laws, equal opportunities, recognised employment relationship, freedom from intimidation, and a safe and healthy working environment.



OMEGA SUPPLIES LTD'S COMMITMENT

1.3 Sustainable Procurement Standard

1.3.1 Working in partnership

We will seek out organisations that share our commitment to sound environmental performance and improvement. Where applicable, we will offer assistance to our suppliers in raising their environmental awareness. We will develop partnerships with our suppliers and contractors, and work together to minimise the environmental and social impacts of our supply chain.

Sustainability requirements will be considered and, where appropriate, will be specified in initial tender documentation for both suppliers and contractors to ensure that suppliers and contractors are aware of our environmental and social criteria at an early stage in the tender process.

SME firms, voluntary and community organisations, social enterprises and ethnic minority businesses will always be considered members of our supply chain as they play an important role in the local economy and contribute to social cohesion. Where our supply chain SMEs require our help to raise their sustainability standards, we will work with them supportively to achieve a mutually agreeable standard.

1.3.2 Environmental impact

Our first principle is to purchase goods that have a minimal impact upon the environment, both local and global. Factors taken into consideration will include sustainability of resource production, transportation, full life energy/raw material consumption and waste production, and percentage recycled content. To this end, we will work with our goods suppliers and end customers to a mutually agreeable sustainability standard in the goods initially supplied by ourselves and processed through ourselves for supply to our end customers.

Wherever possible, we will consume and purchase less by identifying and eradicating wasteful practices within our own operation and those operations where we have influence.

We will re-cycle goods at the end of their life where this is possible, and where it is not possible, ensure disposal in the most environmentally sound manner.

We will purchase products and services that meet minimum environmental standards.

To promote and embed the adoption of sustainable services, we will develop and support through appropriate awareness programmes, new methodologies for identifying needs; appraising options; agreeing design and specification; supplier selection; tender evaluation; contract management; and supplier development.

1.3.3 Procurement process

We will use our purchasing power, wherever practicable, to influence and encourage the creation of a more reliable market for environmentally and ethically produced products and services.

Environmental and social factors shall be considered in the purchasing process. Specifically, this includes considering what the product is made from, the product durability, where it is made and by whom and under what employment and human rights conditions. Additionally, assess the efficiency of the product during its use and the processes involved in its production and distribution, what the disposal requirements are, and if it can be reused or recycled.

Wherever we are able to, we will add sustainability into the procurement cycle: identifying needs; appraising options; design and specification; supplier selection; tender evaluation; contract management and supplier development.



We will ensure that sustainable development concepts are embedded into purchasing functions throughout all our training and development programmes.

1.3.4 Monitoring and measuring

We will always seek to establish key, auditable, performance indicators for sustainable and ethical procurement where appropriate, and monitor and measure the performance of our supply chain against them.

We will always seek, where applicable, to ensure that recognised international standards in international are given effect through procurement decisions, including international obligations on climate change, sustainable development and human rights. We will support national policy and legislation to reduce CO2, ban ozone-depleting substances, protecting biodiversity, human diversity and the support of indigenous population promotional policies.

SUSTAINABLE AND ETHICAL PROCUREMENT STANDARDS EXPECTED OF OMEGA SUPPLIES LTD SUPPLIERS

We expect all our suppliers to comply with legal requirements and to adopt the following moral principles:

1.4 Regulatory compliance

Suppliers shall comply with all national and other applicable law and regulations. Where the national law and this Standard are in conflict, the highest standards consistent with national law should be applied.

Where the provisions of law and this Standard are not in conflict but address the same subject, the provision which affords the greatest protection to people and the environment should be applied.

1.4.1 Employment

There is no forced, bonded or involuntary prison labour.

All employees, without distinction, have the right to join or form trade unions of their own choosing and, where a significant proportion of the workforce agree, to bargain collectively.

Employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

1.4.2 Elimination of child labour

The long-term elimination of child labour should take place in a manner consistent with the best interests of the children concerned.

Suppliers should develop or participate in and contribute to policies and programmes that provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

Children and young persons under 18 shall not be employed at night or in hazardous conditions.

1.4.3 Right to a living wage

Wages paid for a standard working week meet or exceed national (or, where applicable, local) legal standards.

In any event, wages should not be paid in kind and should be enough to meet basic needs.

All workers should be provided with written and comprehensible information about their employment conditions in respect to wages before they enter employment, and the particulars of their wages for the pay period concerned each time that they are paid.



1.4.4 Avoidance of excessive working hours

Standard working hours must comply with national laws and national benchmark industry standards; whichever affords greater protection to the employee.

All employees should not on a regular basis be required to work in excess of 48 hours per week and should be provided with at least one day off for every 7-day period on average. Overtime requested by the employer must be voluntary and must not be requested on a regular basis.

1.4.5 No discrimination

A policy of equality for all should be in place and there should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, religious beliefs, union membership or political affiliation.

1.4.6 Provision of regular employment

To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship should not be avoided.

Examples include the abuse of labour-only contracting, sub-contracting, or home-working arrangements, through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, or the excessive use of fixed-term contracts of employment.

1.4.7 No harsh or inhumane treatment

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse of other forms of intimidation shall be prohibited.

1.4.8 Safe and Healthy Working Conditions

We expect our suppliers:

To provide a safe and healthy working environment bearing in mind international standards, the prevailing knowledge of the industry, and of any specific hazards.

To take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working practice and environment.

Provide workers with suitable and sufficient health and safety training, in order that they fully understand the hazards associated with the work activity and environment and the correct practices required to minimise the risks.

Provide suitable and adequate welfare facilities including toilet facilities, drinking water ,and food storage where required. Accommodation, where provided, shall be clean, safe and meet the needs of the workers.

To assign responsibility for health and safety to a senior management representative.



1.4.9 Environment

We expect our suppliers:

To have an effective environmental policy, to implement the policy at all levels throughout the company, and to include a commitment to continual improvement in environmental performance and prevention of pollution.

To comply with all environmental legislation, regulations and all local laws which relate to the organisation's environmental aspects to facilitate the protection of the environment.

To have a process that ensures conformity to local regulations, including those relating to the reduction, reuse and recycling of waste and the elimination and safe disposal of dangerous materials.

To identify a person within its business who has responsibility for environmental compliance issues and to be able to demonstrate that responsible personnel are adequately trained in environmental matters.

To routinely identify risks of adverse environmental impact associated with their operations and, where operations with identified risks are planned, to ensure they are carried out under controlled conditions with the objective of minimising potential adverse impact upon the environment.

1.4.10 Policy Principles

We will use the following best practice principles to guide the implementation of our policy:

Principle 1: Working together

We will:

Work collaboratively with suppliers in pursuit of this standard.

Guide relationships by the principle of continual improvement.

Welcome rather than penalise suppliers identifying activities that fall below this standard (undertaken by themselves or sub-contractors) and who agree to pursue their aspirations.

Consider a similar ethical trading standard as a reasonable alternative where suppliers are already working towards sustainability.

Principle 2: Making a difference

We will, and we expect our suppliers to:

Use an environmental and social risk-based approach to the implementation of this standard.

Focus attention on those parts of the supply chain where the risk of not meeting this standard is highest and where the maximum difference can be made with resources available.

Be prepared to demonstrate the basis of their approach through the tendering process and formal annual review, audit or periodic sampling process with regard to the above.

Principle 3: Awareness raising and training

We will, and we expect our suppliers to:

Ensure that all relevant people are provided with appropriate training and guidelines to implement the requirements of this standard.



Principle 4: Monitoring and independent verification

We will:

Recognise that implementation of this standard may be assessed through monitoring and independent verification, and that these methods will be developed as our understanding grows.

We will expect our suppliers to:

Provide reasonable access to all relevant information, premises, and workers (through interviews) and co-operate in any assessment against this standard – using reasonable endeavours to ensure that sub-contractors do the same.

Use reasonable endeavours to provide workers covered by this standard with a confidential means to report to the supplier failure to observe its requirements.

Principle 5: Continuous improvement

We will, and we expect our suppliers to:

Apply a continual improvement approach in agreeing schedules for improvement plans with suppliers not meeting this standard.

Base improvement plans on individual case circumstances.

Omega Supplies Ltd will not do business with a supplier where serious breaches of this standard are identified and where the supplier consistently fails to take corrective action within an agreed timescale.

SUMMARY OF SUPPLIER PARTNERSHIP OBLIGATIONS

1.5 Social responsibility

Suppliers must uphold basic human rights.

Suppliers must ensure that all employees have attained the minimum age required in order to be legally employed.

Employees must be free to choose to work for the supplier and free to leave the supplier and there should be no forced, bonded or involuntary labour.

Employee wages and benefits should at least meet industry or national legal standards.

Employee working hours and holiday allowances should comply with industry standards or national laws.

Employee working conditions must be safe and hygienic.

Suppliers should always work within the laws of their country.

Suppliers should have a policy of equality where there is no discrimination.

Suppliers must make every effort to minimise the impact on the environment by seeking continual reduction in the use of resources, waste generation, and by re-using and recycling where practical, without affecting quality.

No organisation within the supply chain should be linked to an oppressive regime, or be involved in a business that may damage the reputation of or is unacceptable to the principles of Omega Supplies Ltd or its potential end customers.

Employees should have freedom to join trade unions or other representative organisations.



1.5 Supplier management

A supplier's confidential information must not be disclosed to any third party or used in any way without the consent of the supplier.

The relationship between Omega Supplies Ltd and the supplier should be open and honest and no relevant information should deliberately be withheld by either party.

In competitive situations, unsuccessful suppliers should be fully debriefed about the procurement process and the rationale around the decision-making process.

All suppliers should be treated fairly at all stages of the procurement process.

The arbitrary or unfair use of purchasing power or influence is discouraged.

Any material personal interest which may affect, or be seen to affect, impartiality or judgement

should be declared by any staff member involved in the procurement process.

It should be ensured that suppliers understand and agree to any negotiated terms and conditions.

With regard to size, maturity and location of suppliers, consideration should be given to the magnitude of business awarded to a supplier, the impact of that business on the supplier, and the level of dependence on that business.

1.6 Evidence of Compliance

The Omega Supplies Ltd will carry out regular monitoring of the implementation of sustainable procurement commitments and ethical standards by business units to enable us to identify trends and ensure that environmental and social factors are being considered in procurement decisions.

Richard Arnold (Managing Director) On behalf of Omega Supplies Ltd

Date: 31st January 2023