

Sustainable & Ethical Procurement Policy

1. Introduction

Connexion Developments Ltd is committed to integrating social and environmental considerations alongside financial factors in our procurement decisions. Our approach ensures that the goods and services we procure contribute to sustainable economic development, minimize resource consumption, and adhere to ethical business practices.

Procurement plays a crucial role in mitigating social exploitation risks within the supply chain while enhancing global working and living standards. This policy establishes the minimum requirements and expectations for sustainable and ethical procurement. It emphasizes that all staff and suppliers must uphold our ethical principles, ensuring fairness and honesty in all business relationships, including those with employees, subcontractors, third parties, and local communities.

2. Objectives

2.1 Sustainable Procurement

Our goal is to drive continuous improvement in procurement decisions by prioritizing sustainable and ethical trading practices. Specifically, we seek to:

- Minimize adverse social and environmental impacts in the supply chain.
- Reduce the environmental footprint of service operations.
- Source products that meet recognized environmental standards.

2.2 Ethical Procurement

Our ethical procurement objectives ensure that workers in the supply chain are treated with dignity and afforded fundamental rights, including:

- Freedom of employment and association.
- Payment of a living wage.
- Compliance with national labour laws regarding working hours.
- Equal opportunities and recognized employment relationships.
- Freedom from intimidation.
- A safe and healthy working environment.

3. Procurement Process

Connexion Developments Ltd will leverage its purchasing power to promote environmentally and ethically responsible products and services. Procurement decisions will consider:

- Material composition and durability of products.
- Manufacturing origins and working conditions.
- Product efficiency, lifecycle impact, and end-of-life disposal.

Sustainability will be embedded into all procurement phases, including needs assessment, option appraisal, supplier selection, contract management, and supplier development. Training programs will be implemented to ensure sustainability principles are integrated into procurement functions.

4. Monitoring and Measurement

Key performance indicators (KPIs) will be established where appropriate to assess sustainable procurement practices and supply chain performance. Procurement decisions will align with national and international environmental laws, including climate change obligations and sustainability regulations.

Connexion Developments Ltd will support policies and legislation aimed at reducing CO2 emissions, eliminating ozone-depleting substances, and protecting biodiversity.

5. Ethical Procurement Standards

5.1 Regulatory Compliance

Suppliers must comply with all applicable national and international laws. Where national laws and this policy conflict, the highest applicable standards should be followed to ensure maximum protection of workers and the environment.

5.2 Employment Practices & Modern Slavery Prevention

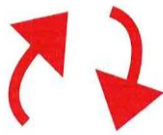
- Suppliers must not engage in forced, bonded, or involuntary labour, nor retain workers' identity documents or deposits.
- Employees' representatives must have the right to perform their functions without discrimination.

5.3 Elimination of Child Labor

- Suppliers must ensure a long-term strategy for eradicating child labour in a manner that prioritizes the welfare of affected children.
- Children and young workers under 18 must not work at night, in hazardous conditions, or without appropriate supervision.

5.4 Right to a Living Wage

- Wages must meet or exceed national legal standards.
- Workers must receive written terms of employment outlining wage conditions before employment begins.
- Wage deductions as a disciplinary measure are strictly prohibited.



5.5 Environmental Responsibility

Suppliers are expected to:

- Maintain an effective environmental policy that commits to continuous improvement and pollution prevention.
- Comply with environmental regulations and local laws.
- Implement waste reduction, reuse, and recycling initiatives.
- Designate a responsible individual for environmental compliance and ensure appropriate training is provided.
- Identify and mitigate environmental risks associated with their operations.

6. Guiding Principles

6.1 Principle 1: Collaborative Engagement

Connexion Developments Ltd will:

- Work closely with suppliers to uphold ethical and sustainable standards.
- Encourage transparency and improvement in supply chain practices.
- Accept alternative ethical trading standards where they align with our objectives.

6.2 Principle 2: Maximizing Impact

We and our suppliers will:

- Adopt a risk-based approach to prioritizing social and environmental impact.
- Focus efforts on the most critical areas of the supply chain.
- Demonstrate accountability for sustainability initiatives.

6.3 Principle 3: Awareness & Training

Both Connexion Developments Ltd and its suppliers will ensure relevant personnel receive adequate training and guidelines to uphold sustainability and ethical standards.

6.4 Principle 4: Monitoring & Independent Verification

- Implementation of this policy will be assessed through monitoring and third-party verification.
- Suppliers must provide access to relevant information, premises, and workers for compliance assessments.
- A confidential mechanism must be available for workers to report violations.

6.5 Principle 5: Continuous Improvement

- Suppliers not meeting our standards must agree on an improvement plan.
- Plans will be tailored to individual cases and reviewed periodically.
- Connexion Developments Ltd reserves the right to terminate relationships with suppliers who fail to address serious breaches within agreed timelines.

7. Responsibilities & Authority

7.1 Company Leadership

This policy is issued under the authority of the Managing Director of Connexion Developments Ltd.

- **Company Directors & General Manager** are responsible for ensuring adherence to this policy within their respective divisions.
- **Divisional Directors** must implement and monitor compliance within their teams, reporting to their divisional boards.
- **Managers** are responsible for embedding this policy within their operations and reporting to directors.
- **The Managing Director** is responsible for reviewing the policy, ensuring it remains up to date, and overseeing training and guidance development.

8. Evidence of Compliance

Connexion Developments Ltd will conduct regular monitoring and audits to evaluate adherence to sustainable and ethical procurement commitments. Each business division must maintain documentation and records demonstrating compliance for audit purposes.

This policy reinforces Connexion Developments Ltd's commitment to ethical and sustainable procurement, ensuring a responsible and transparent supply chain that benefits both society and the environment.

Signed on Behalf of Connexion
Developments Ltd:

Michael G Freye

Michael Freye (Director)

Date:

11th March 2025