



RESPONSIBLE PURCHASING POLICY

BROOK GREEN SUPPLY LTD & CF PARTNERS

CSR DOCUMENT

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www.brookgreensupply.com

Registered office: Brook Green Supply Ltd, 80 Hammersmith Rd, London W14 8UD
Registered in England and Wales; registered number: 09910619; vat number: 279 9709 26



In addition to the details laid out in the Responsible Purchasing Policy below, it is worth noting that CF Partners is regulated by the Financial Conduct Authority and as such all requirements of this regulation are applied to all group companies including Brook Green Supply.

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1. RESPONSIBLE PURCHASING POLICY

- 1.1 As a business dealing with thousands of counterparts, Brook Green Supply recognise the utmost importance of conducting business in the right way. Both internally and externally we are committed to transparency, value creation and developing long term relationships with staff and external counterparts.

Brook Green Supply Operating Principles

- 1.2 The Responsible Purchasing Operating Principles sit within our established purchasing practices that ensure an equitable procurement process in line with all applicable laws and regulations. To implement the Responsible Purchasing Policy, Brook Green Supply will;
- a) Work collaboratively with suppliers to improve environmental, social, and ethical standards with the aim of realising continuous improvement in all three areas for both our suppliers and ourselves.
 - b) Protect the confidentiality of information entrusted to us.
 - c) Recognise the supplier's own standard where they are working to environmental, social and ethical standards similar to those stipulated in the Brook Green Supply Environmental Policy.
 - d) Not require suppliers to realise environmental, social, and ethical standards more onerous than our own.
 - e) Ensure that all relevant employees are aware of the Responsible Purchasing Policy.
 - f) Seek to exert commercial influence where we are confident that improvements can be made in environmental, social, or ethical performance of suppliers.
 - g) Ensure that supplier's staff working on our premises are treated with the same respect for diversity and workplace safety as our own staff.
 - h) Base our supplier selection on objective and transparent criteria that include the consideration of environmental, social, and ethical performance.
 - i) Cease trading with suppliers showing persistent disregard for important elements of environmental, social, and ethical performance.
 - j) Act as an advocate for responsible supply chain practices within our industry sector.
 - k) Use a risk-based approach to ensure we focus on those areas where the risk is greatest and maximum impact can be achieved.

Supplier Operating Principles

Brook Green Supply expect that all our suppliers adhere to the Operating Principles set out below;

- a) Suppliers should comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions.
- b) Suppliers should demonstrate continuous improvement in their approach to sustainable and responsible purchasing.

Society

1.3 Brook Green Supply seeks to ensure that the working conditions at suppliers of the products and services we purchase meet the standards of the International Labour Organisation (ILO) and the Universal Declaration of Human Rights (UDHR).

1.4 We expect our suppliers to adopt and demonstrate the following standards of social compliance:

- a) **Child Labour:** Organisations should ensure the effective long-term elimination of child labour, in a manner consistent with the interests of the children concerned. Children or young persons under 18 shall not be employed at night or in hazardous conditions.
- b) **Forced Labour:** There should be no forced, bonded or involuntary labour and no workers are required to lodge “deposits” or identity papers with their employers and should be able to leave after giving reasonable notice.
- c) **Health, Safety and Hygiene:** All employees should expect to work in an environment that is both safe and healthy. Adequate steps should be taken to prevent accidents occurring in the normal course of work. Workers should receive suitable health and safety training and have access to clean toilet facilities and clean drinking water as required.
- d) **Discipline:** Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is not acceptable. Disciplinary and grievance procedures shall be clearly documented and communicated to all employees. All disciplinary measures of a serious nature shall be recorded.
- e) **Freedom of Association and Employee Representation:** All workers and employers have the right to form and join organizations of their own choosing without prior authorization.
- f) **Working Hours:** Working hours should not be excessive and shall comply with relevant national laws. Overtime should be voluntary.
- g) **Equality of Treatment:** Organisations will seek to eliminate discrimination in access to employment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability, or social origin and promote equality of opportunity and treatment.
- h) **Remuneration:** Wages and benefits afforded to workers should meet national standards. Workers should be provided with clear written

information on their pay and conditions. Excessive deductions on wages should not be permitted as a disciplinary measure.

- i) **Employment Terms:** All workers should be provided with simple, written contracts which must detail the terms and conditions of their employment. Contracts should be clearly understandable to each worker. Work performed should be on the basis of recognised employment law and practice.
- j) **Community Impact:** Organisations are encouraged to support the communities in which they operate through appropriate community initiatives.

1.5 It is understood that organisations must comply with national and other applicable laws and regulations and where there is conflict between these and this policy then the highest standards linked with such laws and regulations shall be applied. Where there is no conflict, we would expect that the provisions that give the greatest protection to workers should be applied.

Environment

1.6 We seek to ensure that appropriate attention is paid to environmental issues when Brook Green Supply purchase products and services.

1.7 In all cases suppliers should be able to demonstrate environmental policies and management systems sufficient to ensure continuous improvement in environmental performance. Therefore, suppliers should be able to demonstrate:

- a) Documented policies regarding environmental management.
- b) The ability to monitor and review environmental performance.
- c) The degree to which operations are covered by recognised environmental management systems or the organisations intentions towards such accreditation.
- d) The awareness of potential environmental risks inherent in their production, service, or sourcing activities.
- e) The implementation of mechanisms and processes in place to mitigate or minimise potential environmental risks.
- f) The degree to which products and services have been designed with environmental considerations in mind.

1.8 Suppliers should seek to:

- a) Minimise the use of energy, water, and raw materials where practical.
- b) Maximise the use of recyclable and renewable materials including energy where possible.
- c) Make practical efforts to minimise waste and dispose of it in a safe, efficient, and environmentally responsible manner.
- d) Avoid contamination of the local environment and ensure that emissions, air, noise, and odour pollution is, as a minimum, within nationally defined limits.

Ethics

- 1.9 Brook Green Supply has clear ethical standards and arrangements to promote and encourage compliance; similar standards are expected of our suppliers. Suppliers should be able to demonstrate the existence of processes and procedures to implement appropriate staff guidelines and codes of conduct.
- 1.10 Suppliers should ensure that management systems and practices are in place to ensure the prevention of:
- a) Money Laundering.
 - b) Insider Trading.
 - c) Conflicts of Interest.
 - d) Fraud, Bribery and Corruption and other improper Payments or Gifts.
 - e) Unauthorised access to personal and business information.
- 1.11 Senior Management has overall responsibility for implementation and review of our commitments. This policy will be reviewed and updated periodically to ensure it remains in line with our business objectives.