



Responsible, Ethical and Sustainable Procurement Policy 2023

OCS UK & Ireland

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Introduction

Reference to the “OCS Group” means “OCS Group UK Limited, OCS UK&I Limited, OCS One Complete Solutions Limited and each of their direct and indirect subsidiaries from time to time”.

OCS Group and subsidiary companies have a responsibility alongside our supply chains, to procure goods and services in a manner that is responsible, ethical and sustainable. OCS Responsible, Ethical and Sustainable Procurement Policy is our commitment to ensuring our legacy and our impact is kind and respectful to our communities, our people and our planet.

OCS demand that our supply chains are working in a manner which holds the highest regards for human rights. Only suppliers that share OCS standards and values will be considered appropriate to trade with OCS, and it seeks to develop long-term trading relationships with suppliers based on the principle of fair, open and honest dealings.

OCS will regularly review and update the policy to ensure it remains responsive to stakeholders' expectations, to legislative requirements, but most importantly that it aligns to the core values at the heart of the OCS Group, these being TRUE, Trust, Respect, Unity, Empowerment.

Who this policy applies to

This policy applies to all employees, officers, consultants, contractors, casual workers and agency workers who OCS employs or works with.

Responsibility for this policy

OCS UK&I Limited's board of directors has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the Procurement Director. Suggestions for change should be reported to the Procurement Director. The Procurement Department has day-to-day responsibility for this policy, and you should refer any questions about this policy to them in the first instance. This policy is reviewed annually by the Procurement Director.

Application

All OCS employees with procurement responsibility and suppliers are required to comply with this Responsible, Ethical and Sustainable Procurement Policy and are required to declare their compliance at the start of the procurement activity or trading relationship.

By means of the vendor prequalification process and this policy, all members of our supply chain are required to ensure that they meet all global legislative requirements but in addition pertain to the spirit of the UN Global Compact, the ETI Base Code and the ILO's International Labour Standards which are encapsulated by the following conventions:

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
- Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol)
- Abolition of Forced Labour Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labour Convention, 1999 (No. 182)
- Equal Remuneration Convention, 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- Occupational Safety and Health Convention, 1981 (No. 155)
- Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187)

OCS is committed to ensuring that the requirements of this policy are maintained. We will take every step possible to support OCS employees and suppliers to create a responsible, ethical and sustainable supply chain.

Human Rights and Modern-Day Slavery

The prevention, detection and reporting of modern slavery is the responsibility of all corporate entities and the requirements of the UK Modern Slavery Act 2015 and the global standards which are in place such as the German Supply Chain Due Diligence Act 2023 and the Canadian Modern Slavery Act 2023, are the responsibility of all companies which work in and around the OCS supply chain.

OCS aims to encourage transparency and will support any person or entity who raises genuine concerns in good faith as a result of this policy. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery, of whatever form, is, or may be, taking place in any part of a suppliers' business or in any of their supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

Suppliers are encouraged and required to:

- inform OCS immediately if it believes that it has suffered from any such treatment mentioned above;
- notify OCS as soon as possible if it believes or suspects that a conflict with this policy has occurred or may occur in the future;
- raise concerns about any issue or suspicion of modern slavery in any parts of its business or supply chains of any supplier tier at the earliest possible stage;
- notify OCS as soon as possible if it suspects or believes a breach of this policy has occurred;
- raise any concerns if it is unsure about a particular part of this policy;
- make OCS aware of potential mistreatment of workers more generally, or their working conditions within any tier of its supply chains and any of the various forms of modern slavery.

OCS is committed to ensuring that human trafficking or modern slavery does not form any part of its business or supply chain. It is essential that people working within our business and our supply chains, do so in safe, fair, and legal conditions, and the Company will continue to make every effort to ensure that OCS and its suppliers act ethically and with integrity in all its business relationships.

Suppliers are encouraged and required to:

- read and understand the ETI Base Code;
- read and agree to our Modern Slavery Statement which outlines OCS expectations for both staff and suppliers;
- produce an annual Modern Slavery Statement should they be required to do so;
- inform OCS if suppliers are unsure about any principles outlined in the ETI Base Code or our Modern Slavery Statement before suppliers agree to adhere to them;
- advise OCS if suppliers need support in trying to address any of the issues outlined in the ETI Base Code or our Modern Slavery Statement.

Ethical Behaviour

As well as working with suppliers that share our values and commitment in ensuring every effort is being taken to eradicate modern day slavery and labour mistreatment from supply chains, OCS wants to make sure that it is working with suppliers that conduct business practices in an ethical manner. This includes environmental impact, business integrity, corporate social responsibility, equality and diversity and health & safety.

HSQE

OCS invests in its people to ensure we are providing a safe environment for all colleagues, suppliers, clients, and visitors. This is achieved by ensuring that all employees are provided with the information, training, equipment, and supervision they need to perform their job in a safe manner. The Company expects suppliers to take the same approach.

Suppliers are encouraged and required to:

- provide consultation with employees on matters affecting health, safety, and environment;
- provide information, instruction, training, and supervision for employees in terms of role competence, health, safety and environmental management, risk, control, and responsibilities;
- provide and maintain safe plant and equipment including suitable protective clothing;
- allocate sufficient resources for the implementation of health, safety, and environmental standards;
- use materials and substances that are safe and can be used in a safe manner;
- provide suitable control of risks arising from work activities in terms of health, safety, and welfare;
- prevent work related ill health risks and accidents.

Business Integrity

OCS aims to ensure every supplier and associated person acting for, or on behalf of, our organisation understands it is responsible for maintaining the highest standards of business conduct. Outlined below are OCS expectations regarding business conduct. Any breach of the points outlined below is likely to constitute a serious contractual and criminal matter and we do not accept this as a company. All parties should:

- Train staff in and comply at all times with the Bribery Act 2010 and OCS Anti-Bribery Statement which outlines its expectations for both staff and suppliers.
- Reject any business practice which might reasonably be deemed improper.
- Never use authority or position for financial gain.
- Make OCS aware of any personal interest that might affect, or be seen by others to affect, its impartiality in decision making.
- Strive for genuine, fair and transparent competition.
- Be truthful about their skills, experience and qualifications.
- Responsibly manage any business relationships where unethical practices may come to light and take appropriate action to report and remedy them.
- Make OCS aware if it has any concerns around the understanding of the points outlined above so the Company can support suppliers in enabling understanding.

- As an organisation OCS strives to comply with the provisions of ISO 27001. The Company expects suppliers to conduct its business in a way that recognises the importance of and seeks to prioritise information security. The Company will periodically audit compliance with data protection and security.

CIPS Code of Ethics

Understanding and Commitment

- Ensure consistent understanding of business ethics across the organisation at all levels.
- Continually enhance knowledge of all relevant laws and regulations in the countries in which the organisation operates, either directly or indirectly.
- Commit to eradicating unethical business practices including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour.

Ethical Practice

- Conduct all business relationships with respect, honesty, and integrity, and avoid causing harm to others as a result of business decisions.
- Treat all stakeholders fairly and impartially, without discrimination or favour.
- Actively support and promote corporate social responsibility (CSR).
- Avoid any business practices which might bring the procurement profession into disrepute.

Professionalism

- Use procurement strategies to drive unethical practices from the supply chain.
- Ensure procurement decisions minimise any negative impact on human rights and the environment whilst endeavouring to maximise value and service levels.
- Put ethical policies and procedures in place, regularly monitored and updated, and ensure compliance.
- Mandate the education and training of all staff involved in sourcing, supplier selection and supplier management to professional standards.
- Practice due diligence in all business undertakings.

Accountability

- Accept accountability and take ownership of business ethics.
- Foster a culture of leadership by example.
- Take steps to prevent, report and remedy unethical practices.
- Provide a safe environment for the reporting of unethical practices.

Prevention of the Facilitation of Tax Evasion

OCS requires that all suppliers shall, and shall ensure that any supplier group companies, employees, or subcontractors shall:

- not engage in any activity, practice, or conduct which would constitute either:
 - a UK tax evasion offence within the meaning of section 45(4) of the CFA 2017 (“UK Tax Evasion Offence”);
 - a foreign tax evasion offence within the meaning of section 46(5) of the CFA 2017 (“Foreign Tax Evasion Offence”);
 - a facilitation of UK Tax Evasion Offence within the meaning of section 45(5) of the CFA 2017;
- a facilitation of Foreign Tax Evasion Offence within the meaning of section 46(6) of the CFA 2017; or failure to prevent a Facilitation Offence within the meaning of sections 45 or 46 of the CFA 2017
- have and maintain in place such policies and procedures as are reasonable to prevent the facilitation of tax evasion by another person, including employees of the supplier, the supplier group companies, or any subcontractors).

Sustainable Procurement

It is the OCS vision to deliver best practice Sustainable Procurement, help deliver the required government outcomes, ensure OCS contracts provide best value for money and that OCS can demonstrate continuous improvement against UK Gov targets such as Net Zero 50 or the legislative requirements such as the Public Service (Social Value Act) 2012.

OCS seeks to promote economic growth, tackle poverty and social exclusion, and minimise its own environmental impact.

The OCS Responsible, Ethical and Sustainable Procurement Policy is a key driver to ensuring that we specify sustainable goods and services wherever possible and encourage best sustainable practice throughout our supply chains. If OCS is to fully meet its responsibilities and match the government’s commitment and targets for sustainable development then we need to deliver, and we are looking to our suppliers to help us achieve more.

Where appropriate, OCS procurement decisions will consider whole life cost, benefits, and associated risks, sourcing ethical products and materials in accordance with recognized standards. OCS will embed sustainability considerations throughout all OCS commercial activities with particular focus on the following areas.

Supporting a diverse supply chain

OCS is committed to promoting equality and diversity in accordance with the Equality Act 2010. We expect any supplier providing goods or services to OCS to demonstrate the same commitment, maintaining an inclusive workplace free of harassment and discrimination against any person based on status or characteristics protected by Law.

OCS support suppliers who classify as a SME, Micro SME, VCSE or Diverse Supplier in any way we can. We recognise the importance of supporting companies owned by people from underrepresented groups and believe by doing so, we can drive innovation, increase flexibility, bolster performance and foster greater resilience within the supply chain.

OCS will champion these entities and embed equality, diversity and inclusion within our own procurements and within those of our clients and work with suppliers who have demonstrated their commitment to equality, diversity and inclusion.

We aim to achieve this by defining our policy and tracking mechanisms of measuring supplier diversity. We will capture data from all suppliers and incorporate diversity, equity, and inclusion (DEI) into every aspect of the business. We will create an environment of inclusion and require our suppliers to sign up to the OCS code of conduct which includes our diversity initiatives we expect of our supply chain.

We understand that we need to ensure contract clauses support diversity initiatives and break down barriers within our onboarding and awarding process to ensure we are dynamic to the needs of a diverse supply chain and a fast-changing market.

Net Zero

OCS have committed to Net Zero 2040 and our supply chain will be expected to support this target. On a periodic basis, OCS will request detail from our supply chain of targets set to reduce carbon emissions and progress on previous targets set to ensure that we are managing our Scope 3 liability.

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Related Policies

This policy should be read in conjunction with the following:

- Procurement Policy
- Supplier Code of Conduct
- Health, Safety, Quality & Environmental Policy
- Modern Day Slavery Policy
- Diversity & Equality Policy

References and Resources

The Ethical Trading Initiative (ETI) - <http://www.ethicaltrade.org>

The Slave Free Alliance www.slavefreealliance.org

Hope for Justice - <https://hopeforjustice.org>

ETI Base Code - <http://www.ethicaltrade.org/resources/key-eti-resources/eti-base-code>

Net Zero 50 - [Net Zero Strategy: Build Back Greener](https://www.gov.uk/government/consultations/net-zero-50) - GOV.UK (www.gov.uk)

CIPS Code of Conduct - [CIPS Code of Conduct](https://www.cips.org/cips-code-of-conduct) | CIPS

UN Global Compact - <http://www.unglobalcompact.org/>

UN Guiding Principles on Business and Human Rights - http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

Stronger Together - <http://stronger2gether.org/>

International Labour Organisation [International Labour Organization \(ilo.org\)](http://www.ilo.org/)