



Sustainable Social Responsibility and Ethical Procurement Policy

Introduction

We 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 practicably consider whole life cost and the associated risks and implications for society and the environment.

JC Gillespie Ltd rejects entirely Modern Slavery and is committed to paying as a minimum the guidelines set out by the Government. It is a condition of supply that our suppliers do the same.

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 nationally and around the world.

This policy standard sets out the detailed requirements and minimum expectations of our policy of 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.

Social Responsibility and Ethical Procurement Standards

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

- Suppliers shall comply with all national and other applicable law and regulations.
- JC Gillespie completely rejects all forms of modern slavery.
- There is no forced, bonded, or involuntary prison labour.
- Employees' representatives are not discriminated against.
- The long-term elimination of child labour should take place in a manner consistent with the best interests of the children concerned.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- Wages paid for a standard working week meet or exceed national legal standards.
- 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.
- 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.



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

Sustainable Procurement

Our 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, the reduction of environmental impact from service operations and the purchase of products that meet recognised environmental standards.

Ethical Procurement

Our ethical objective is to ensure that people in the supply-chain are treated with respect and have 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 to a safe and healthy working environment.

Working in partnership and in the community

We will seek out organisations that share our commitment to sound environmental performance and improvement. We will develop partnerships with our suppliers and contractors and work together to minimise the environmental and social impacts of our supply chain.

We will support local community initiatives and support charitable causes where reasonable and practical.

Environmental impact

Where practicable, we will 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.

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.

Procurement process

We will use our purchasing power, where practicable, to influence and encourage suppliers in order to create 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 where it is made and by whom.



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 comply with all environmental legislation, regulations and all local laws which relate to the organisations 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.

Principles

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

- Principle 1: Working together.
- Principle 2: Making a difference.
- Principle 3: Raising awareness and training.
- Principle 4: Monitoring conformance
- Principle 5: Continuous improvement

Responsibility and Authority

This policy standard is issued under the authority of the Managing Director. Responsibility for implementation of this policy standard is set out below.

- Responsibility for the achievement of this policy standard rests with the Directors
- Directors are responsible for monitoring its implementation in the everyday activities.
- Managers and staff are responsible for implementing the policy standard, monitoring its implementation in the everyday activities of their operations and report to their Managing Director.
- The Managing Director is responsible for reviewing the policy standard and ensuring that it is kept up to date with changes in legislation.

Kevin MacDonald
Managing Director
1st April 2025