

2San Global Limited
 Unit 11 Oakwood Way, Carnforth Business Park, Carnforth, LA5 9FD, UK



Policy Name	ETHICAL SOURCING POLICY	Policy Version	1.1
Effective Date	31.08.2021	Date of Last Revision	31.08.2021
Admin Responsible	SIMON WHILEY, GLOBAL MANAGING DIRECTOR		

VERSION HISTORY

Version	Approved by	Revision Date	Description of Change	Author
1.0	SIMON WHILEY	31.08.2021	FIRST ISSUE	CORNELIA PANAYIOTOU
1.1	NEIL ASHWORTH	31.08.2021	FINAL VERSION	CORNELIA PANAYIOTOU

RELATED DOCUMENTS

Below provides a list of all supporting documents that are linked to the ETHICAL SOURCING POLICY.

Document Reference	Document Name

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INTRODUCTION

POLICY STATEMENT

The Board of 2San Global Limited recognises the significance of this ETHICAL SOURCING POLICY and maintaining the highest standards of customer care and partnership that are fundamental to its brand promise of “Better Care, Better Life”.

ETHICAL SOURCING POLICY

We recognise that ethical sourcing is an essential and efficient business practice, which is integral to the way we work. It helps us to make properly informed and balanced decisions when procuring the products and services needed for our projects. It is our intention that we will only do business with responsible suppliers and subcontractors who understand the nature of the products, materials and services they are supplying, and who recognise their responsibility to protect the environment and foster good relations with their employees and local communities. Suppliers and subcontractors must undertake to act in accordance with the business’ supplier approval requirements. This means that all products and services supplied must have been produced in compliance with all applicable laws and regulations through the entire supply chain. All suppliers and subcontractors shall work proactively to ensure that zero ethical breaches occur by preventing all forms of corruption, including but not limited to extortion and bribery. This includes a commitment to comply with any applicable competition (anti-trust) laws.

Suppliers and subcontractors shall be able to demonstrate that they have procedures in place to deal with the risks of bribery in their organisation in accordance with the United Kingdom’s Bribery Act 2010 and will be required to acknowledge this as part of the business’ supplier approval process.

All subcontractors shall note that not only must they undertake to work in accordance with the requirements of 2San Global, but additionally it is the duty of subcontractors when they intend to further subcontract part of their work to another subcontractor, after having obtained permission to do so from the 2San, that they make it explicitly clear to their subcontractor that they too will be bound by the 2San requirements. Where practicable only materials produced by Recycling Solutions (GRS) will be procured to ensure that the closed loop recycling ethos is driven through the business.

POLICY SCOPE & COMPLIANCE

This policy applies to all 2San Global Limited locations and staff and to all information and information systems, on which 2San Global Limited depends. All staff are responsible for complying with this policy.

POLICY GOVERNANCE

The following table identifies who within 2San Global Limited is Accountable, Responsible, Informed or Consulted with regard to this policy.

- RESPONSIBLE: Neil Ashworth – Non-Executive Board Director
- ACCOUNTABLE: Simon Whiley – Global Managing Director
- CONSULTED: Board of 2San Global Limited, Departmental specialists and teams
- INFORMED All employees, all contractors, all other 3rd party organisations with any form of access to 2San Global Limited’s information and information systems.

This policy will be reviewed as it is deemed appropriate, but no less frequently than annually.

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Policy review will be undertaken by the Board of 2San Global Limited, Departmental specialists and external sources where appropriate.

ROLES & RESPONSIBILITIES

ETHICAL SOURCING POLICY is a responsibility of all staff. The ultimate responsibility for information security lies with SIMON WHILEY, GLOBAL MANAGING DIRECTOR but this responsibility is discharged through the designated roles of Departmental Director / Heads of / Specialists etc.

AWARENESS, TRAINING & QUERIES

The ETHICAL SOURCING POLICY is readily accessible internally via the company intranet and can be provided upon request to external parties.

ETHICAL SOURCING POLICY awareness is incorporated in the induction process and delivered on an on-going basis through a number of communication methods, including:

- Mandatory annual compliance training
- Intranet awareness page
- Team Briefings, Meetings and Conferences
- Emails To discuss any matter relating to the ETHICAL SOURCING POLICY, contact your Head/Director of Department in the first instance.

POLICY REVIEW DETAILS

Date of publication	31.08.2021
Frequency of review	3 years
Due date of next review	31.08.2024
Due date of next review	Simon Whiley, Global Managing Director