



ETHICAL PROCUREMENT POLICY

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INTRODUCTION

At TLCCH we will take social and environmental factors into consideration alongside financial factors in making decisions on the procurement of goods and the commissioning of services. Our procurement decisions should, where practicable, consider whole life cost and the associated risks and implications for society and the environment. Procurement can make a significant contribution to our goals of sustainable economic development and resource minimisation by ensuring that the goods and services we buy consider optimum environmental performance. Procurement has an additional role to play in minimising any risk of environmental and 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 around the world. This policy clarifies the expectation that our staff and suppliers must have a natural respect for our ethical standards in the context of their own culture and that relationships with our suppliers are always based on the principle of fair and honest dealings. 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.

TLCCH IS TO SEEK TO PROCURE GOODS AND SERVICES WHICH:

- Are produced and delivered under conditions that do not abuse or exploit any persons or the environment.

These considerations will form part of the evaluation and selection criteria for all goods and services procured by TLCCH.

PURPOSE

The purpose of the policy is to promote good labour and environmental standards in the supply chain of goods and services to our clients and protect TLCCH reputation.

PURCHASING OF GOODS AND MATERIALS

This section is chiefly concerned with consumables.

TLCCH shall make every reasonable effort to reduce the impact of purchased products and to purchase environmentally responsible products.

1. TLCCH shall purchase produce that are manufactured locally AND that are made with recycled, non-toxic, or recyclable materials and that minimize environmentally harmful processes and products in their production, if those items meet or exceed specifications, required quality and affordability.
2. When purchases are necessary, strong consideration shall be given to durable items, items having minimal packaging, and items that are readily recycled when discarded.
3. TLCCH is encouraged to use independent, third-party, environmental product or service label standards when writing specifications for, or procuring, materials, products, or services.
4. TLCCH shall make every effort not to use chemicals or products containing toxins. Where these are unavoidable, to purchase those only with low toxicity
5. TLCCH shall purchase and use rechargeable batteries where applicable.
6. TLCCH shall purchase and use recycled paper (minimum 60% post-consumer recycled with 100% post-consumer recycled paper being the goal depending on availability and quality) for

all documents whenever possible. Documents printed on recycled paper shall include the recycling symbol when possible.

7. New and replacement equipment for lighting, heating, ventilation, refrigeration and air conditioning systems, water consuming fixtures and process equipment and all such components shall have one or more of:
 - a. An “A” or above rating on the European Energy Label
 - b. An Energy Saving Trust Recommendation
 - c. A TCO label
 - d. An Energy Star label
8. Cleaning or sanitation equipment shall either:
 - a) Have a European Eco Label or
 - b) Be a recommended traditional cleaning product e.g. white vinegar or bicarbonate of soda

SUPPLIERS OF GOODS AND MATERIALS

This section is chiefly concerned with suppliers.

TLCCH shall make every reasonable effort to ensure that suppliers are themselves environmentally responsible and ethical. Goods purchased from or used by suppliers must meet the requirements of the PURCHASING OF GOODS AND MATERIALS section above.

EMPLOYMENT IS FREELY CHOSEN

Freedom of association and the right to collective bargaining are respected.

Workers have the right to join or form trade unions of their own choosing and to bargain collectively.

WORKING CONDITIONS ARE SAFE

A safe and hygienic working environment shall be provided, bearing in mind the knowledge of the industry and of any specific hazards.

Adequate steps shall be taken to prevent accidents and injury to health occurring in the course of work by minimizing the causes of hazards in the working environment.

Workers shall receive regular and recorded health and safety training and training shall be made available for new workers.

CHILD LABOUR

TLCCH believe that children under the age of 15 should not have to work for a living. All children should have the opportunity to be in full-time education and not be compelled to undertake activities that can affect their physical and/or mental development.

Workers aged between 15 and 18 should not work at night or in hazardous conditions.

If children are found to be working, the employer should provide appropriate remediation, which may include support to attend education.

The supplier should have a clear policy for dealing with under-age workers, even if none are employed.

Should any instance of child labour be identified, we would work closely with our suppliers to develop a sensitive and sustainable solution that puts the welfare of the child first.

LIVING WAGES ARE PAID

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmarks, whichever is higher.

Wages should always be high enough to meet basic needs and to provide some discretionary income.

WORKING HOURS ARE NOT EXCESSIVE

Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

NO DISCRIMINATION IS PRACTICED

There is no discrimination practiced in hiring, compensation, access to training, promotion, termination or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

NO INHUMANE TREATMENT IS ALLOWED

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

TLCCH EXPECTS SUPPLIERS TO:

- Accept responsibility for labour and environmental conditions under which products are made and services provided. This includes all work contracted or sub-contracted and that conducted by home or other out-workers.
- Assign responsibility for implementing the policy to a senior manager.
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BOTH PARTIES WILL:

- Require the immediate cessation of serious breaches of the policy and if necessary, the management representative has the authority to terminate the business relationship.
- Avoid discriminating against enterprises in developing countries.
- Recognise official regulation and inspection of workplace standards, and the interests of legitimate trades unions and other representative organisations.
- Seek arbitration in the case of unresolved disputes.
- Ensure that all current labour and environmental protection standards are implemented and being adhered to and comply with country specific regulations. TLCCH will prioritise suppliers which not only comply with regulation but who seek to deliver best practice.

The TLCCH is committed to continual improvement of its Ethical Procurement Policy.