




FAIR TREATMENT OF SUPPLIERS

Validated	October 2022
Scope	We seek excellence in every aspect of our business and are committed to minimise the social, environmental and ethical impacts of our supply chain.
Purpose	To seek the purchase of goods and services that minimise negative and enhance positive impacts on the environment and society whilst meeting our business requirements.
Procedure owner	Galaxy Staffing Ltd.
Last review date	October 2021
Next review date	October 2023
Review frequency	Annually
Authorisation	Sulochna Chhetri
Signature	

Policy

By incorporating social, environmental and ethical considerations into purchasing decisions we endeavour to make a positive contribution to the environment and society. To this end, we have developed Operating Principles that are applicable to both our suppliers and to ourselves.

These principles seek to ensure that we and our suppliers act in a responsible manner. Where it is found that a supplier's conduct is not in accordance with Galaxy Staffing's Responsible Purchasing Policy and Operating Principles, we will seek to engage with that supplier and encourage continuous improvement in their environmental, social and ethical performance. In support of the Policy and Principles we will:

- Assign responsibility for the Responsible Purchasing Policy and the associated Operating Principles to named responsible individual(s) and provide Management Board oversight of both Policy and Principles.
- Allocate funds for the effective direction and implementation of the Policy and Principles, with particular emphasis on encouraging continuous improvement.
- Measure and monitor the application of the Policy and Principles.
- Review and revise the Policy and Principles on an annual basis.
- Conduct an environmental, social and ethical assessment of our key suppliers or external resources as appropriate.



Our 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, We will:

- 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.
- Protect the confidentiality of information entrusted to us.
- Recognise the supplier's own standard where they are working to environmental, social and ethical standards similar to those stipulated in the PwC Operating Principles.
- Not require suppliers to realise environmental, social and ethical standards more onerous than our own.
- Ensure that all relevant employees are aware of the Responsible Purchasing Policy.
- Ensure that procurement management is responsible for establishing the compliance of key suppliers with the Supplier Operating Principles.
- Seek to exert commercial influence where we are confident that improvements can be made in environmental, social or ethical performance of suppliers.
- Ensure that supplier's staff working on our premises are treated with the same respect for diversity and workplace safety as our own staff.
- Base our supplier selection on objective and transparent criteria that include the consideration of environmental, social and ethical performance.
- Cease trading with suppliers showing persistent disregard for important elements of environmental, social and ethical performance.
- Act as an advocate for responsible supply chain practices within our industry sector.
- 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

We expect that all our suppliers adhere to the Operating Principles set out below:

- Suppliers are expected to have management systems in place for delivering compliance with the Operating Principles in their own operations and those of their suppliers.
- Suppliers should comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions.
- Suppliers are expected to communicate their expectations for compliance on all the issues raised within the Operating Principles to all relevant employees and suppliers.
- Suppliers should provide evidence to enable assessment of the implementation of our Operating Principles, those acting on their behalf and other relevant independent 3rd parties.
- Suppliers should demonstrate continuous improvement in their approach to sustainable and responsible purchasing.

Responsible Purchasing Policy Statement of Intent Society.

We seek 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). We expect our suppliers to adopt and demonstrate the following standards of social Compliance:

- **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.
- **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.
- **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.
- **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.
- **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.
- **Working Hours:** working hours should not be excessive and shall comply with relevant national laws. Overtime should be voluntary.
- **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
- **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.
- **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.
- **Community impact:** Organisations are encouraged to support the communities in which they operate through appropriate community initiatives.

Responsible Purchasing Policy Statement of Intent

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



We seek to ensure that appropriate attention is paid to environmental issues when we purchase products and services. 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:

- Documented policies regarding environmental management.
- The ability to monitor and review environmental performance.
- The degree to which operations are covered by recognised environmental management systems or the organisations intentions towards such accreditation.
- The awareness of potential environmental risks inherent in their production, service or sourcing activities.
- The implementation of mechanisms and processes in place to mitigate or minimise potential environmental risks.
- The degree to which products and services have been designed with environmental considerations in mind.
- Suppliers should seek to:
 - Minimise the use of energy, water and raw materials where practical.
 - Maximise the use of recyclable and renewable materials including energy where possible.
 - Make practical efforts to minimise waste and dispose of it in a safe, efficient, and environmentally responsible manner.
 - Avoid contamination of the local environment and ensure that emissions, air, noise and odour pollution is, as a minimum, within nationally defined limits.

Responsible Purchasing Policy Statement of Intent Ethics

We have 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.
- Suppliers should ensure that management systems and practices are in place to ensure the prevention of:
 - Money Laundering.
 - Insider Trading.
 - Conflicts of Interest.
 - Fraud, Bribery and Corruption and other improper Payments or Gifts.
 - Unauthorised access to personal and business information.