

Business Management System

Section 12: Human Resources

Part 12 – ETHICAL SOURCING POLICY

Document Record		
Rev	Changes	Date
1	Original	3 rd January 2024
2	Annual Review	5 th January 2025
3	Responsible Recruitment and Employer Pays Principle added	4 th January 2026

Ethical Sourcing Policy Statement

This company is committed when purchasing goods and/or services to select those which are produced and delivered without abuse or exploitation of persons involved and have the least negative impact on the environment; as far as is reasonably practicable.

Where a supplier demonstrates evidence of a breach of these conditions then the company will take steps to inform the supplier of the alleged non-conformance and the need to take corrective actions to meet the required conditions; giving a reasonable time deadline for such. Where the supplier fails to meet these requirements within the timescale given then the company will seek an alternative supplier at the earliest possible time.

The ethical codes we require of our suppliers are those we apply within the company and include:

- Employment is freely chosen by the workers involved
- The supplier recognises the rights, of the workers involved, for freedom of collective bargaining
- The working conditions for the workers are safe and hygienic
- The supplier pays living wages
- The working hours are not excessive for those involved
- The supplier does not practice any form of unlawful discrimination of people
- Regular employment contracts are given to the workers whenever possible
- The supplier will not treat others in a harsh or inhumane manner at any time
- Applicable Labour/Employment Law must be fully adhered to by the supplier
- Child labour shall not be used by the supplier
- Undue and unnecessary use of materials by the supplier is avoided
- Recycled materials will be used by the supplier whenever possible and practicable
- Steps will be taken by the supplier to conserve scarce resources
- The supplier will ensure efficient energy use and will minimise harmful emissions
- The supplier will minimise waste and ensure safe disposal of such
- The supplier will not act in any way that involves illegal, fraudulent, unprofessional or corrupt behaviour

All employees will:

- Declare in advance any interest they may have with any supplier, or bidding supplier, or customer of the company and be prepared to withdraw from those dealings if required
- Adopt strategies and processes that deliver best value for money in procuring supplies or services; whilst eliminating harm to those people and minimising use of scarce resources and causing harm to environments involved
- Develop supply relationships that foster mutual understanding and respect of ethical supply chain codes
- Ensure our supply requirements are specified in such a way as to ensure suppliers are clear about the ethical conditions of the company
- Act impartially, in a fair and reasonable manner, and comply with applicable legislation, competition and trading best practices and professional behaviour in all supply chain activities
- Ensure payment for goods and services are made in accordance with the terms agreed, subject to satisfactory supply
- Comply with information security requirements and sensitivities

RESPONSIBLE RECRUITMENT AND EMPLOYER PAYS PRINCIPLE

Delatim is committed to responsible recruitment and to the Employer Pays Principle. No worker employed directly by Delatim, or by any organisation within our supply chain, shall be charged directly or indirectly any recruitment fee or related recruitment cost as a condition of obtaining, commencing, retaining or changing employment.

All recruitment fees and associated recruitment costs shall be borne by the employer. Such fees and costs shall not be recovered from workers through wage deductions, deposits, repayment arrangements, salary sacrifice, retention of identity documents or any other direct or indirect means. This requirement applies to Delatim and to organisations operating within our supply chain, including subcontractors, suppliers, recruitment agencies, labour providers and other intermediaries involved in the recruitment or placement of workers.

Relevant suppliers and recruitment partners are required to operate recruitment practices that are transparent, fair and consistent with this principle. Delatim may request evidence of compliance as part of supplier selection, onboarding, assurance or audit activities.

Where Delatim becomes aware that a worker has paid a prohibited recruitment fee or related recruitment cost, the matter will be investigated promptly. The responsible employer or supply chain organisation will be required to cease the practice, reimburse the affected worker promptly and implement appropriate corrective action to prevent recurrence. Failure to take satisfactory corrective action may result in suspension or termination of the supplier relationship.

Workers shall not suffer retaliation, disadvantage or discrimination for raising concerns regarding recruitment fees, costs or recruitment practices. Concerns may be raised through Delatim's normal management, grievance, whistleblowing or supply chain reporting arrangements.

PRINCIPLES AND SCOPE OF THE POLICY

The Board acknowledges they have ultimate responsibility for ensuring that the company has in place a system of appropriate ethical supply chain guidance for staff. This guidance is designed to assist managers and staff involved in the purchasing and delivery of supplies and services.

KEY OPERATIONAL FRAMEWORK

The company's systems of staff induction and training programmes will include education on this policy; however no such systems can provide absolute protection against a failure to comply with ethical principles and codes.

The Board is responsible for:

- Ensuring the development and maintenance of effective staff education and guidance to prevent and minimise non-conforming behaviour,
- Ensuring the carrying out of vigorous and prompt investigations if a non-conformance is alleged or found to occur,
- Ensuring appropriate corrective actions are taken to remove or minimise the risks of such behaviour recurring.

Managers should assess the types of supply chain behaviours and risk involved in the operations for which they are responsible; to regularly review and test the communication, education, practice guidance and control systems for which they are responsible; to ensure that controls are being complied with; and to satisfy themselves that their systems continue to operate effectively.



James Delahunt
Managing Director

4th January 2026