

Ethical Purchasing Policy

POL-013 Version 24

Our Ethical Purchasing Policy seeks to promote good labour and environmental standards in the supply chain of goods and services to our clients and to protect Storm Group and all its trading companies (Storm Group Services Ltd, Storm Development Solutions Ltd, Storm Holdings Ltd) reputation for integrity.

Storm Group and its trading companies will:

1. Provide guidance to suppliers who seek to promote and implement the policy's standards into their own business processes and in their relevant supply chains.
2. Continually improve the way in which suppliers are appointed and supplier relationships are managed, audited and reported.

This policy applies to all permanent and fixed-term staff employed by Storm Group and its trading companies and any contractors, consultants, Suppliers or other persons acting under or on behalf of Storm Group and its trading companies.
This Policy will be communicated to all suppliers, employees and contractors through Storm Group and its trading companies induction. Further awareness of this Policy will be reinforced through ongoing communication in staff newsletters, tool box meetings and awareness sessions.
This policy will be reviewed annually as a minimum and when required through changing needs, circumstances and legislation. Any changes will be further communicated through briefings and documentation of this filed in personal files

Policy

At Storm Group and its trading companies we seek to purchase goods and services which are produced and delivered under conditions that do not abuse or exploit any persons or the environment and in full compliance with current legislation. These considerations will form part of the evaluation and selection criteria for all goods and services purchased by us.

The policy is based largely on the following principles with advice on how to put them into practice:

- Working conditions are safe.
- Employment is freely chosen.
- Working hours are not excessive.
- Wages meet at least national legal standards.
- Training is provided.
- No discrimination is practiced.

- Diversity and good workforce practices are encouraged.
- Child labour is eliminated.
- No inhumane treatment is allowed.

We operate appropriate health and safety policies and procedures overseen by a senior manager responsible for compliance and monitoring as well as ensuring employees have the necessary training and health and safety equipment. We provide comfortable and hygienic working conditions with clean toilets and water suitable for drinking and washing. Where worker housing is provided it should meet the same standards for health and safety as the workplace.

We afford employees the freedom to choose to work and not use forced, bonded or non-voluntary prison labour. We afford employees freedom of association with the right to join an independent trades union or other workers' associations and to carry out reasonable representative functions in the workplace. We facilitate alternative means of democratic representation where laws restrict freedom of association and collective bargaining.

We comply with national and international laws or industry standards on employee working hours, whichever affords greater protection. We provide clear, easily understood disciplinary, grievance and appeal procedures that are lawful and appropriate. Any disciplinary measures should be recorded and suppliers should not seek to deprive employees of their legal or contractual rights.

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.

We raise employees' skills through training and access to professional development as befits their role to improve quality and secure greater value for money.

We do not practice discrimination in hiring, compensation, training, promotion, termination or retirement either directly or indirectly.

We provide clear and accessible processes for resolving disputes with employees.

We 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.

We prohibit physical abuse or coercion, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.

Storm Group and its trading companies will:

Require the immediate cessation of serious breaches of the policy and if necessary terminate the business relationship. They will seek to ensure all employees are aware of their rights and involved in the decisions which affect them. Both parties will avoid discriminating against enterprises in developing countries. Both parties will recognise official regulation and inspection of workplace standards, and the interests of legitimate trades unions and other representative organisations. Both parties will seek arbitration in the case of unresolved disputes. Both parties will ensure that all current labour standards are implemented and being adhered to and comply with country specific regulations.

Storm Group and its trading companies selects and purchases goods and services which:

1. Are safe.
2. Are environmentally responsible.
3. Are produced and delivered under fair labour conditions.
4. Are fair value for the price, quality and volume offered.
5. Meet government, industry and Storm Group and its trading companies safety and quality standards.
6. Do not involve any bribery or corruption, including the payment of so-called 'facilitation payments' (which are prohibited by the Storm Group and its trading companies Anti Bribery Policy).

Storm Group and its trading companies will seek alternative sources where the conduct of suppliers violates Storm Group and its trading companies Ethical Purchasing Policy, and where there is no effort by the supplier to address that situation within an agreed time period.

By agreeing to supply Storm Group and its trading companies suppliers agree to adhere to –

- Storm Group Ethical Purchasing Policy.
- The standards set out below, both within their own companies and those of their own suppliers, further along the supply chain.

Storm Group and its trading companies Ethical Purchasing Policy requires that its suppliers shall:

1. Produce and deliver their products and services in line with all applicable laws, local regulations and best industry standards and practices, including all applicable anti-bribery and corruption laws of their country as well as any other applicable laws (including without limitation the UK Bribery Act 2010)
2. If requested by Storm Group and its trading companies, report progress on implementing the ethical purchasing policy by describing actions taken and detailing future planned activity.
3. Comply with the EICC Code of Conduct, which defines the acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards, under which products shall be made and services provided. This includes all work contracted or sub-contracted. (Appendix 1 is available in multiple languages on the EICC web-site at www.eicc.info)
4. Storm Group and its trading companies may require suppliers who have been identified as being potentially high risk to complete the EICC's Self-Assessment Questionnaire (also known as RA2) and/or undergo a third party validated EICC audit.
5. Highlight to Storm Group and its trading companies any areas of legal or ethical concern so that both organisations can resolve any gaps and deficiencies.
6. Seek continuous improvement in the way the company produces and delivers its products and services and manages its supplier relationships.

Both parties will:

1. Work together to resolve any areas of risk and concern and non-compliance.
2. Immediately cease any serious breaches of the ethical purchasing policy and, where these persist, terminate their business relationship.
3. Ensure all employees are aware of their individual obligations under Storm Group and its trading companies ethical purchasing policy and Code of Conduct.

Storm Group and its trading companies reserves the right to review, vary or revoke this policy.



Alexander Finch-Hutchins
Director

Date 11/8/2025
Version 24