

Responsible Purchasing Policy

Fairly and ethically

This policy details the key guidelines and procedures we apply when procuring goods and or services.

Skewb are committed to sourcing and procuring fairly and ethically, and wherever possible will take account of social, environmental and ethical impacts.

Skewb will only purchase goods and services which are absolutely necessary, ensuring we minimise waste and inefficiencies, whilst endeavouring to make a positive contribution to the environment and local communities.



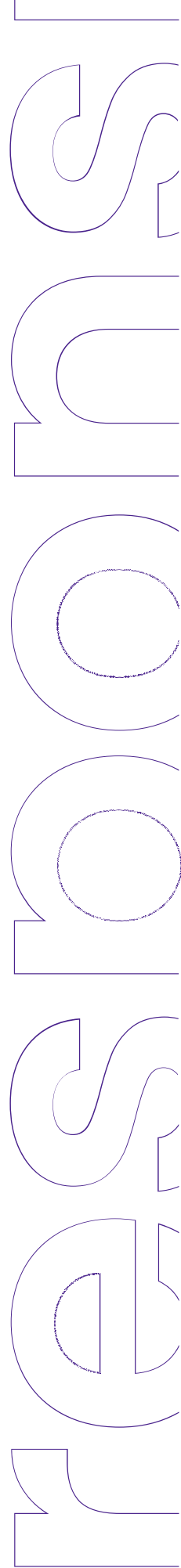
What do you need to know?

The purpose of this policy is to ensure that all our employees, partners and suppliers, know and understand their obligations with regards to our responsible purchasing policy and principles and consequences of non-compliance in this area.

This includes ensuring that we have adequate systems and controls in place to ensure our procurement process adheres to all applicable laws and regulations and is open and transparent in nature.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, partners, third-party representatives and business partners.

This policy does not form part of any employee's Offer of Employment and we may amend it at any time.





RES
PONS
IBILITIES



Responsibilities



SKEWB PURCHASING PRINCIPLES

To ensure we purchase responsibly Skewb will:

1. Ensure that all relevant employees are aware of the Responsible Purchasing Policy.
2. Work collaboratively with suppliers to continuously improve environmental, social and ethical standards.
3. Ensure the protection and confidentiality of information shared with us.
4. Ensure that our procurement process is adhered to and our suppliers are managed effectively.
5. Ensure that supplier's working on our premises are treated with the same respect for diversity and workplace safety as our own teams.
6. Select our suppliers on objective and transparent criteria (where applicable) that include the consideration of environmental, social and ethical performance.
7. Cease trading with suppliers showing persistent disregard for our responsible purchasing policy.
8. Use a risk based approach to our supplier management.



SUPPLIER PURCHASING PRINCIPLES

Skewb expect all of our suppliers to:

1. Comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions.
2. Communicate their expectations for compliance to this policy to all relevant employees and suppliers.
3. Provide evidence to enable assessment of adherence to our supplier due diligence procedures.
4. Demonstrate continuous improvement in their approach to sustainable and responsible purchasing.



How will we purchase responsibly?



COMMUNITIES

We are committed to local sourcing wherever possible. We believe that by locally sourcing our goods and services we can support the local economy by boosting income and encouraging jobs growth, and that we can reduce our carbon footprint and therefore help tackle climate change.



HEALTH & SAFETY

All employees, partners and suppliers should expect to work in an environment that is both safe and healthy. We take steps to prevent accidents occurring in the normal course of work, as well as training our teams on health and

safety, and undertaking the appropriate risk assessments to ensure our teams remain safe. We expect our suppliers to adopt similar standards of health and safety and demonstrate their commitment to safe working environments.



EQUALITY & DIVERSITY

All employees, partners and suppliers should expect to work in an environment that is free of harassment and discrimination on the basis of race or ethnicity, sexual orientation, pregnancy, gender identity, religion or religious beliefs, culture, marital and civil partnership status, age, educational background, physical and mental ability, caring responsibilities, political opinion or physical appearance. We are committed to promoting equality of opportunity and treatment when purchasing goods and or services.



ANTI BULLYING & HARASSMENT

All employees, partners and suppliers should expect to work in an environment that is free of physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of bullying and or intimidation. We have clear policies and procedures in place which are communicated to our teams to ensure a safe working environment, and we will not hesitate to take appropriate action in the event our policies are breached.



ANTI MODERN SLAVERY

Skewb are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our suppliers and prohibit against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our partners and suppliers will hold their own suppliers to the same high standards.



ANTI BRIBERY & CORRUPTION

Skewb operates a zero-tolerance policy with regards to bribery and corruption. We have an Anti-Bribery & Corruption Policy in place, and equally expect our partners and suppliers to demonstrate the existence of a similar process and procedure.

Skewb carries out a number of activities to help prevent against money laundering in the course of its procurement process:

- **Due Diligence** – due diligence is performed on all new suppliers and where legal or regulatory standards require it.
- **Supplier Evaluation Form** – this form acts as an application form for new partners or suppliers and asks detailed questions about the business/person for purposes or performing due diligence checks. Partners and suppliers are also expected to provide accompanying documents where applicable such as Certificate of Incorporation, VAT Registration, Data Protection Certificate and Regulatory Body Membership etc

- **Traceable Transactions** – all transactions carried out by Skewb are recorded in such a manner that their original origin can be traced should the need arise.
- **Records Management** – all documents, accounts and transactions associated with clients/customers will be retained as per the legal or statutory retention periods
- **Ongoing Due Diligence** – we will undertake due diligence checks annually for the life of the client/supplier account, ensuring that all information is kept up-to-date and that no adverse information has arisen since the last monitoring check was performed.



ENVIRONMENT

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

We recognise that our suppliers will vary in size but encourage all to demonstrate continuous improvement in environmental performance. Therefore, suppliers should be able to demonstrate:

- a) How they minimise the use of energy, water and recycle where practical and applicable.
- b) How they minimise waste and dispose of it in a safe, efficient, and environmentally responsible manner.
- c) How they are working towards minimising their carbon footprint.



Our Procurement Process



IDENTIFY NEEDS

An individual or the business identify a need for a product or service. The process of identifying a need may be an existing product that simply needs to be reordered or the introduction of a new product or service.

Procurement needs are split into 3 areas, internal, delivery and marketing and events.

When a need is identified the Request to Procure form may be required and forward to the Facilities, Marketing and Events Team for review and approval.



SOURCE & SELECT SUPPLIERS / VENDORS

When determining how we will procure, we will first assess whether we already have a supplier engaged who can provide what is needed, or if a new supplier needs to be sourced.

If a new supplier is required, we will research the market and obtain information and quotes from three potential suppliers. Where needed we will undertake commercial negotiations.

Where we are procuring a product or item, or the cost is associated with a specific event, tickets, membership etc this will likely be done so utilising the Company credit card, and the terms of purchase will be as stipulated by the supplier. The next steps in the process will not be applicable to this type of procurement.

Where we are purchasing services (i.e. engaging with businesses who will be providing ongoing services to us), we will request the supplier completes a Supplier Evaluation Form supported by documentary evidence. On acceptance of the Supplier Evaluation Form and supporting evidence we will progress to the purchase requisition.



PURCHASE REQUISITION

On approval of the Supplier Evaluation Form, a contract will be arranged. There are 2 types of contract:

1. Purchase order and accompanying conditions– this will be utilised for one-off purchase's for which we will be invoiced for.
2. Service Agreement accompanied by a purchase order – this will be utilised for ongoing services provided to Skewb.

The contract will specify terms and conditions including agreed scope, timescales, costs and invoicing terms.

The People Team will be responsible for issuing the Agreement / Purchase Order to suppliers, and the finance team will track and monitor invoices linked to the purchase order to ensure budgets are not exceeded.

Supplier records are kept on our supplier register, and we track and monitor aspects such as insurance expiration, purchase orders and key personnel and contacts.



SUPPLIER MANAGEMENT

The terms and conditions agreed within the service agreement are used as a marker against KPIs which enable Skewb to manage supplier relationships and resolve any potential issues that may arise during the contract.

We meet with our key suppliers regularly to review performance, progress, and address any issues we may have with the service delivery. If issues arrive prior to the meetings, we will escalate our concerns to the designated supplier contact and record them on Skewb One (Supplier Evaluation).

Maintaining a healthy relationship with our key suppliers plays an important role in our future procurement needs and ensures continuity with our preferred services.



CONTRACT TERMINATION

Service Agreement will terminate for 2 reasons:

1. The Agreement will terminate naturally because of the contract expiring and no renewal.

2. The Agreement will be terminated early by either party serving notice.

On termination of the Agreement, we will archive the supplier's records and retain all information relative to our engagement with them as per our Data Privacy Policy.



Communication & Awareness of this Policy

We will communicate and provide relevant employees with training on our responsible purchasing policy and procedure to help them understand their duties and responsibilities under this Policy.

Our responsible purchasing policy is available for our suppliers / vendors to access, and we will communicate to them in the event there are any changes to our Policy.



Breaches of this Policy

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may potentially end our relationship with other individuals and organisations working on our behalf if they breach this policy.



Policy Updates

We will review this policy annually and update you should any changes be made.

Date	Reason	Created By	Verified By	Version No
April 2021	New Policy Creation	Claire Crew	Shashi Seshadri	1.0
February 2022	Annual Policy Review. HR to People. Update Template	Becky Knight	Tania Flasck	2.0
August 2022	2022 Enhancements Review.	Becky Knight	Tania Flasck	3.0
March 2023	Annual Review. Update to Policy Owner	Becky Knight	Taylor Vinters	4.0
March 2024	Annual review, updated policy owner	Imogen West	Indu Seshadri	5.0

If you have any concerns relating to this policy, please contact people@skewb.uk



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