



## RESPONSIBLE PROCUREMENT POLICY

### ISSUE 010

Authority	Name	Signature	Date
Author -	Catherine Watkins	Approved via UCM	
Reviewed -	Helen Jarvis		
Approved -	Dave Adey		

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## 1. Introduction

telent Technology Services recognises that Responsible Procurement and ethical sourcing practices are of a significant global importance and play an important role in a company's competitiveness and profitability.

This policy reflects telent's values and commitment to responsible procurement, ethical sourcing and sustainability and contributes to how we do business with our Suppliers, Subcontractors and Business Partners.

## 2. Scope

This Policy applies to all telent Central Functions and Business Units who are engaged in Procurement and Supplier Management activities involving Suppliers, Subcontractors and Business Partners.

We aim to implement this policy throughout our Supply Chain and expect that all our Suppliers, Subcontractors and Business Partners ensure that they and their Supply Chain comply with the principles and practices set out in this Policy and related telent policies.

Suppliers are expected to comply with all applicable laws including but not exclusive to laws in relation to recruitment, employment, eligibility to work, Right to work, Modern Slavery Act, working conditions, rights of employees and health and safety.

## 3. Policy

This Policy reflects telent's commitment to Responsible Procurement and ethical sourcing and specifies the minimum standards of conformance we expect from our Employees and Supply Chain.

This Policy forms part of our tender specifications with Suppliers, Subcontractors and Business Partners with compliance to the Policy being considered of major importance when awarding business. The principles of this Policy are also captured in telent's New Supplier Requisition Request (NSRR) and modular Pre-Qualification Questionnaire (mPQQ) Process, UCM Document PROC.BSUP.PAPS.414210 and provides that new suppliers are required to submit prior to commencement of business with telent on the basis of spend or relevant accreditation and certification and perceived risk.

A framework of additional specific policies underpins this Policy. telent is prepared to work with our Supply Chain to support them to achieve or improve compliance with this Responsible Procurement Policy and supporting policies.

telent is committed to supporting our customers sustainability goals by striving to understand our obligations to their commitments and adapting our ways of working, policies, procedures and processes to reflect their requirements.

## 4. Principles of implementation

The following Principles will guide telent in the implementation of this Policy. They will govern the manner in which we aspire to achieve the core international ethical standards set out in the Standards section below.

### 4.1 Communication

We will communicate this Policy and supporting policies to existing, new and potential Suppliers, Subcontractors and Business Partners. We will also work with our Supply Chain, to implement this policy, to communicate our approach and exchange good practice.

### 4.2 Collaboration

telent will:

- Work collaboratively with suppliers in pursuit of these Standards.
- Guide relationships by the principle of continual improvement.
- Welcome rather than penalise suppliers identifying activities that fall below these Standards (undertaken by themselves or sub-contractors) and who agree to pursue our aspirations.
- Review and, where appropriate, revise these Principles in the light of experience.
- Consider a similar ethical trading standard as a reasonable alternative where suppliers are already working towards this alternative.
- Not hold a supplier to a higher standard than telent's own policy on these issues.
- telent will seek out opportunities to collaborate within our industry, with our supply chain, customers, and peers to share best practices and continue our learning

### 4.3 Making a Difference

telent and its suppliers should:

- Use a risk based approach to the implementation of these Standards.
- Focus attention on those parts of the supply chain where the risk of not meeting these Standards is highest and where the maximum difference can be made with resources available.
- Suppliers should be prepared to share with telent the basis of their approach with regard to the above and share evidence to demonstrate compliance to all applicable laws and this policy.

#### 4.4 Reporting

telent will on request provide details of our performance and practices with regard to the implementation of this policy.

#### 4.5 Awareness Raising and Training

telent and its suppliers should:

- Ensure that relevant people are provided with appropriate training and guidelines to implement the Standards.

#### 4.6 Monitoring and Independent Verification

telent will:

- Recognise that the implementation of these Standards may be assessed through monitoring and independent verification, and that these methods will be developed as our understanding grows.
- Utilise processes to manage and monitor risk. The New Supplier Registration Request (NSRR) and Pre-Qualification Questionnaire Process (PQQ) UCM Doc PROC.BSUP.PAPS.414210 supports telent in obtaining information to perform risk analysis and take a collaborative approach with Suppliers, Subcontractors and Business Partners.
- We will assess our Suppliers, Subcontractors and Business Partners compliance to Responsible Procurement via telent's Vendor Assessment Process.
- We will regularly monitor performance of our Supply Chain against a clear set of indicators and targets
- If under-performance is identified we will seek to work with the Supply Chain and commit to a mutually agreed remediation plan. Review of such plans will form part of on-going Supplier relationship reviews.
- Were telent deems appropriate we will visit Suppliers, Subcontractors and Business Partners sites where people work directly or indirectly for telent to monitor employees working conditions.

telent's suppliers should:

- Provide telent or its representatives with reasonable access to all relevant information and premises and cooperate in any Responsible Procurement Policy assessment - using all reasonable endeavours to ensure that sub-contractors do the same.
- Use all reasonable endeavours to provide workers covered by the Standards with a confidential means to report to the supplier failure to observe the Standards.

#### 4.7 Continual Improvement

telent and its suppliers should:

- Apply a continual improvement approach in agreeing schedules for improvement plans with suppliers not meeting these Standards.
- Base improvement plans on individual case circumstances.

telent will:

- Following an escalation to telent's Head of Procurement, consider terminating any business relationship with the supplier concerned where serious shortfalls of these Standards persist.
- We will regularly review and update this and supporting policies to ensure compliance with all UK and European legislation and identified good working practices.

#### **4.8 Procurement of ICT equipment and software**

telent will procure ICT equipment and software as set out in the Standards section 5.

### **5. Standards**

telent's aspiration is that its supply base meets the core standards set out below.

The labour standards are based upon the United Nations Universal Declaration of Human Rights - "a common standard of achievement for all peoples and all nations" - and the [International Labour Organisation Conventions](#), as well as other key areas of law and ethics important to telent.

#### **5.1 Labour Rights**

##### **5.1.1. Employment is freely chosen**

**5.1.1.1** There is no forced, bonded or involuntary prison labour.

**5.1.1.2** Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

##### **5.1.1.3 Modern Slavery Act (2015)**

In accordance with our Anti-Slavery Policy PROC.PRJM.PAPS.390023 telent and its suppliers should:

- Apply a rigorous approach to the prevention, detection and reporting of modern slavery
- Provide a process to allow suspected concerns of slavery to be raised in a formal manner
- Issue a Statement to reflect the supplier's efforts in this area, or to comply with telent's Statement which may be found on PROC.PRJM.PAPS.390024 [www.telent.com](http://www.telent.com)

##### **5.1.2 Freedom of association and the right to collective bargaining are respected**

**5.1.2.1** Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

**5.1.2.2** The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

**5.1.2.3** Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

**5.1.2.4** Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### **5.1.3 Working conditions are safe and hygienic**

**5.1.3.1** A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

**5.1.3.2** Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

**5.1.3.3** Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

**5.1.3.4** Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

**5.1.3.5** Responsibility for health and safety shall be assigned to a senior management representative.

### **5.1.4 Child labour shall not be used**

**5.1.4.1** There shall be no new recruitment of child labour.

**5.1.4.2** telent shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in the appendices.

**5.1.4.3** Children and young persons under 18 shall not be employed at night or in hazardous conditions.

These policies and procedures shall conform to the provisions of the relevant ILO standards.

### **5.1.5 Living wages are paid**

**5.1.5.1** Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

**5.1.5.2** All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

**5.1.5.3** Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

### **5.1.6 Working hours are not excessive**

**5.1.6.1** Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

**5.1.6.2** Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.\*

**5.1.6.3** All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

**5.1.6.4** The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 5.1.6.5 below.

**5.1.6.5** Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

**5.1.6.6** Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

### **5.1.7 No discrimination is practised**

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

### **5.1.8 Regular employment is provided**

**5.1.8.1** To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

**5.1.8.2** Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of



labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

### **5.1.9 No harsh or inhumane treatment is allowed**

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

### **5.1.10 Ensuring Equality & Diversity**

telent recognises that by promoting the principles of equality and diversity we will ensure that the skills and resources of Employees are utilised to the full. telent is therefore committed to achieving and maintaining a workforce, which broadly reflects the local communities in which we operate, and to creating a working environment that combats prejudice, stereotyping, harassment and promotes dignity and respect for the individual.

### **5.1.11 Dignity at work**

We believe that everyone has a fundamental right not to be harassed, bullied or victimised and that we all have a responsibility and expect our employees and supply chain to behave with respect and dignity towards others, be it fellow employees, customers, suppliers and contractors.

## **5.2 Ethics**

telent understands the importance of the way in which we engage and work with suppliers, subcontractors and business partners and that this behaviour is extended through the supply chain. telent therefore sets telent's expectations in the way in which suppliers and subcontractors shall behave and the way in which telent shall engage suppliers.

### **5.2.1 Professional Code of Behaviour**

All telent employees shall maintain the highest possible standard of integrity in all their business relationships and reject any business practice, which might reasonably be deemed improper, and never use their authority for personal gain. All employees will ensure they optimise the use of resources to provide the maximum benefit to company and respect both with the letter and the spirit of contractual obligations.

### **5.2.2 GDPR General Data Protection Regulation**

Suppliers are expected to understand their obligations and to comply in full with the General Data Protection Regulation 2018, as well as support telent in being compliant.

Where on behalf of telent a supplier processes such as, retrieves, uses, adapts or disposes of personal data including, but not exclusive to, permissions granted by the customer, that give network visibility, customer data extractions that include personal data and or, personal contact information about the public and customer staff details for operational or billing purposes.

telent requires suppliers to:

- Process the data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
- Maintain records of processing activities under their responsibility
- Not engage another processor without authorisation from telent
- Make reasonable information available to telent on request and allow for and contribute to audits, including inspections, conducted by telent or another auditor mandated by telent
- Inform telent if, in their opinion, an instruction infringes the General Data Protection Regulation
- Notify telent without undue delay after becoming aware of a personal data breach
- Data must not leave the UK with prior written consent

### **5.2.3 Tax Evasion**

Suppliers must never engage in facilitation of tax evasion, within the UK or abroad, when providing services to telent. Suppliers must also comply with any procedures put in place by telent to avoid facilitation of tax evasion, and provide any associated information or assurances requested by telent, from time to time.

### **5.2.4 Bribery and Anti-corruption**

We are committed to conducting business with integrity and we do not accept any form of bribery or corruption, including, embezzlement, money laundering, kickbacks, extortion and fraud.

### **5.2.5 Gifts and Gratuities**

Will not be accepted so should not be offered.

### **5.2.6 Conflict Minerals**

Suppliers to telent who manufacture components, parts, or products containing tin, tantalum, tungsten, and/or gold shall define, implement and communicate to telent their own Conflict Mineral Policy, outlining their commitment to responsible sourcing and legal compliance and measures for the implementation of such policy.

Suppliers shall work with their own supply chain to ensure traceability of these metals at least to smelter level. Traceability data shall be maintained and recorded for up to 5 years and provided to telent upon request. Once such mechanisms are available, suppliers shall

ensure that purchased metals originate from smelters validated by Suppliers as being conflict mineral free.

Suppliers are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

### **5.2.7 Animal Welfare**

telent and our Supply Chain should operate within appropriate animal welfare standards. We do not accept testing on animals.

### **5.2.8. Media and use of telent logo**

Suppliers must not engage with the media with reference to telent without telent's prior approval. Suppliers must not use telent's logo on their website or any other media without prior approval from telent. The telent log must be removed from websites, or other media, if business contracts have ceased. Links to telent.com should be with telent's prior approval.

## **5.3 Environmental Sustainability**

telent recognises its responsibility to carry out procurement activities in an environmentally responsible manner in accordance with our Environmental Policies. We will determine, our environmental requirements appropriately and include them as part of our product and service selection process and communicate such relevant environmental requirements within our supply chain.

**5.3.1** We also recognise that it is our responsibility to encourage our Suppliers, Subcontractors and Business Partners to;

- minimise any negative environmental effects through the effective application of processes and controls;
- consider local ecology, species and habitat protection
- prevent pollution
- use resources efficiently, diverting from landfill through reuse, recovery and recycling activities.
- minimise waste, usage of water, energy and other consumables.
- maintain an ongoing objective to reduce carbon emissions.
- review and address climate change opportunities and risk.

### **5.3.2. Energy Information (Amendment) Regulations 2018**

Suppliers must fulfill their responsibilities and comply with energy labelling regulations

### **5.3.3 RoHS and Waste Electrical and Electronic Equipment (WEEE)**

Control and restrict the use of hazardous substances. As a company we understand the environmental and health risks associated with the RoHS directive. telent requires that its suppliers will comply with their obligations as a producer of a product that will be subject to

the RoHS directive and that the supplier comply with waste electrical and electronic equipment (WEEE) directive

#### **5.3.4 Timber**

Suppliers must comply with the European Union Timber Regulation (EUTR)

## **6. Working within our Community**

### **6.1 Strategic Labour Needs and Training Initiatives**

telent is committed to supporting people into employment and providing opportunities that assist this. We believe that this supports communities where entering employment may be challenging along with an effective way of identifying talent for the future. As part of our general approach across this country to provide such opportunities we are committed to the Strategic Labour Needs and Training Initiative (SLNT), which is operating in the London regions.

We will work with our Suppliers, Subcontractors and Business Partners to ensure that they understand the principles of SLNT and that they work with us to extend the number and variety of opportunities available to the local communities

### **6.2 Working with SME'S**

telent actively works with Small and Medium Size Enterprise (SMEs). We encourage our suppliers to support and enable SME participation within the supply chain

## **7. References**

The following international standards underpin the Labour Rights Standards and will be used as the primary reference points when implementing the Standards with our suppliers:

The United Nations Universal Declaration of Human Rights. This sets “a common standard of achievement for all peoples and all nations” and represents a set of core international ethical standards.

The United Nations Convention on the Rights of the Child. This has been ratified by almost every member state in the United Nations and provides a framework for interpreting the best interests of the child.

The Conventions of the International Labour Organisation. The ILO incorporates government, employer and employee representatives and is responsible for setting international labour standards. The ILO Conventions have the force of international law and are binding for states that have ratified them.

The ILO Declaration on Fundamental Principles and Rights at Work require all 174 ILO member states to respect, promote and realise the principles contained in the seven core ILO Conventions, regardless of ratification. These are:

Conventions 29 and 105 & Recommendation 35 (Forced and Bonded Labour)

Convention 87 (Freedom of Association)

Convention 98 (Right to Organise and Collective Bargaining)  
Conventions 100 and 111 & Recommendations 90 and 111 (Equal Remuneration for male and female workers for work of equal value; Discrimination in employment and occupation)  
Convention 138 & Recommendation 146 (Minimum Age).  
Although not core ILO conventions, the following ILO standards are especially relevant to the standards of this code:  
Convention 135 & Recommendation 143 (Workers' Representatives Convention)  
Convention 155 & Recommendation 164 (Occupational Safety & Health)  
Convention 159 & Recommendation 168 (Vocation Rehabilitation)  
Convention 177 & Recommendation 184 (Home Work).

## 8. Definitions

The following definitions shall apply to the Child Labour section:

**Child:** Any person less than 15 years of age unless local minimum age law stipulate a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention 138, the lower will apply.

**Young Person:** Any worker over the age of a child as defined above and under the age of 18.

**Child Labour:** Any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

**At Night**

The following text is taken from ILO Convention 90. Please note that there are various exceptions to these provisions contained within the convention

1. For the purpose of this Convention the term night signifies a period of at least twelve consecutive hours.
2. In the case of young persons under sixteen years of age, this period shall include the interval between ten o'clock in the evening and six o'clock in the morning.
3. In the case of young persons who have attained the age of sixteen years but are under the age of eighteen years, this period shall include an interval prescribed by the competent authority of at least seven consecutive hours falling between ten o'clock in the evening and seven o'clock in the morning; the competent authority may prescribe different intervals for different areas, industries, undertakings or branches of industries or undertakings, but shall consult the employers' and workers' organisations concerned before prescribing an interval beginning after eleven o'clock in the evening.

## 9. Supporting Policies and Documents

Existing requirements for acquisition of property and fleet are specified and reported via the existing telent procedures and documents:

- Facilities and Premises Management (FACILITIES.BSUP.PAPS.430223)
- Estates and Facilities Management Strategy (FACILITIES.BSUP.STGY.430222)

### Supporting Policies and Documents

Title	Doc Ref	Issue
Employee Diversity Code Of Practice	HUMR.PAPS-244604	Issue 007
Procurement Process and Policy	QSEPD-00827	Issue 015
NSRR and PQQ Pre-Qualification Questionnaire Process	PROC.PRJM.PAPS.414210	Issue 002
Anti-Slavery Policy	PROC.PRJM.PAPS.390023	Issue 001
Modern Slavery and Human Trafficking Statement	PROC.PRJM.PAPS.390024	Issue 001
telent Annual Sustainability Report	QSE.QHSE.REPS.288928	Issue 006