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# **Ethical Procurement Policy**

### **Purpose**

This Ethical Procurement Policy establishes CJP Sales Ltd commitment to sourcing plastic raw materials in a way that upholds the highest standards of ethical conduct, environmental responsibility, and legal compliance in the United Kingdom.

#### Scope

This policy applies to all employees, contractors, and third parties involved in the procurement of plastic raw materials such as polyethylene, polypropylene, PVC and related additives and intermediates across CJP Sales Ltd UK operations.

#### **Policy Objectives**

To ensure that all procurement decisions:

- Comply with UK legislation and international ethical standards.
- Minimise environmental harm.
- Promote fair labour practices.
- Reduce risks in the supply chain related to sustainability, compliance, and human rights.

#### **Core Principles**

# **Legal and Regulatory Compliance**

All suppliers must comply with:

- UK Modern Slavery Act 2015: No involvement in forced, bonded, or child labour.
- UK REACH Regulation (Registration, Evaluation, Authorisation and Restriction of Chemicals).
- Health and Safety at Work Act 1974.
- Any applicable environmental regulations, including The Environmental Protection Act 1990 and The Plastic Packaging Tax (April 2022).

#### **Environmental Responsibility**

We are committed to reducing our environmental impact by:

- Prioritising suppliers who offer recycled content or bio-based alternatives in accordance with the UK Plastics Pact.
- Ensuring materials are sourced, produced, and transported in ways that minimise carbon footprint, waste, and pollution.
- Supporting closed-loop systems and circular economy initiatives.

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# **Ethical Labour and Human Rights**

We will only engage with suppliers who:

- Uphold the International Labour Organization (ILO) core conventions.
- Provide safe, fair, and inclusive working environments.
- Do not exploit migrant workers or engage in modern slavery or human trafficking.

### **Anti-Corruption and Fair Business Practices**

Procurement activities must:

- Align with the **UK Bribery Act 2010**—no bribery, facilitation payments, or unethical incentives.
- Be free from collusion, price-fixing, or unfair competitive practices.

### **Supply Chain Transparency**

Suppliers must:

- Provide transparent and traceable information on the origin, content, and sustainability profile of plastic raw materials.
- Disclose the use of any high-risk materials or suppliers operating in countries with weak labour or environmental protections.

#### **Supplier Assessment and Auditing**

We will:

- Vet new suppliers through due diligence checks and ongoing monitoring.
- Carry out supplier audits as required to assess compliance with ethical and legal standards.

# **Continuous Improvement and Engagement**

- Encourage open dialogue with suppliers to support continuous improvement in ethical, environmental, and social practices.
- Provide guidance and support to help suppliers meet or exceed policy expectations.

# **Roles and Responsibilities**

- **Procurement Team**: Responsible for ensuring ethical sourcing practices and due diligence.
- Senior Management: Oversees policy implementation and accountability.
- Suppliers: Must comply with this policy and any related standards or contractual requirements.

# **Reporting and Whistleblowing**

Concerns about unethical or illegal practices may be reported via:

Email to: sales@cjpsales.co.uk

In line with the Public Interest Disclosure Act 1998, whistleblowers will be protected from retaliation.

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# 7. Review

This policy will be reviewed annually or in response to significant legal, environmental, or operational changes in the UK plastics industry.

Approved by: Charlotte Evans – Director

Date: 31/12/24