

Supplier Policy



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Supplier Policy

Introduction

Kingspan Group plc and its affiliates (“Kingspan”) are committed to conducting their business activities with integrity, and in a responsible and ethical manner. Kingspan expects the same high standards of its contractors, suppliers, and other business partners.

This Supplier Policy (the “Policy”) applies to all organisations that provide goods or services to Kingspan (a “Supplier” or “Suppliers”).

The Policy sets out Kingspan’s expectations of Suppliers, generally in terms of business practices, and specifically with respect to:

- Business integrity;
- Ethical employment practices;
- Anti-Bribery and Corruption;
- Environmental Responsibility.

Where the requirements of this Policy exceed the minimum standards prescribed in the legislation applicable to a Supplier, the Supplier is expected to adhere to the Policy requirements in addition to the applicable legislation.

Suppliers are expected to maintain appropriate processes and systems to fulfil their obligations of this Policy and to be able to evidence in writing adherence to the requirements contained herein.

Compliance with Applicable Law

Each Supplier shall comply with all applicable laws, statutes, regulations, and codes as are from time to time in force.

General Requirements

Kingspan’s Objectives

Kingspan recognises the safety, health, environmental, social, legal and ethical impacts of all supply and procurement decisions, and will involve its suppliers in addressing any issues that may arise. Kingspan is committed to excellence in safety, health and environmental management. Kingspan expects its suppliers to assist in minimising any negative effects and neutralising any risks.

Kingspan will develop supply strategies and processes that attempt to achieve best value for money in procuring the goods and services that meet its needs and are within legal and ethical standards.

Kingspan will develop relationships that are the most appropriate to gaining a mutual understanding of the needs of Kingspan whilst understanding Supplier capabilities. These relationships will ensure consistency of quality, reliability, availability, timeliness, fitness for purpose and performance at affordable cost.

Kingspan will work with suppliers, offering appropriate support, and make reasonable demands in relation to the improvement of existing standards.

Kingspan expects both its employees and those of its Suppliers to transact with integrity.

Kingspan expects both its employees and those of its Suppliers to act impartially and objectively in all their purchasing activities and to keep written records where appropriate to demonstrate that their actions have been fair and above reproach.

Kingspan expects its employees to adopt best practice, when issuing competitive tenders or invites supplier quotes, judging bids on the merits of their competitive offerings and total life cycle cost.

Kingspan expects both its employees and those of its Suppliers to maintain an unimpeachable standard of integrity in all their business relationships and to foster the highest possible standards of professional competence in all their supply activities.

Kingspan expects its employees and Suppliers to comply with the law of the countries in which they operate and with which Kingspan deals, and in all contractual obligations incurred by or on behalf of Kingspan.

Supplier Requirements

Suppliers must ensure that their products and services are produced and delivered in line with all laws, local regulations and best industry standards and practices.

Suppliers are expected to assign responsibility for internally communicating and implementing the Kingspan ethical purchasing policy to an appropriate manager or responsible person and, if requested by Kingspan, make a written statement of intent regarding the policy, including how it will be implemented and communicated to its employees and suppliers.

If requested by Kingspan, Suppliers must report progress on the implementation of this Policy by describing actions taken and detailing future planned activity.

Suppliers must assume responsibility for the adoption and implementation of acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards under which products are made and services provided. This includes all work contracted or sub-contracted.

Suppliers are encouraged to highlight to Kingspan any areas of legal or ethical concern so that both organisations can have a constructive dialogue about resolving any gaps and deficiencies.

Suppliers should seek continuous improvement in the way the company produces and delivers its products and services and manages its supply chain relationships.

Supplier Policy

Planet Passionate

Kingspan is committed to playing a leadership role in tackling climate change through its Planet Passionate sustainability programme. Kingspan requires all of its Suppliers to support it in this mission and to consequently conduct their operations in such a manner as to cause minimal environmental impact and to continually improve their operations so as to reduce that environmental impact.

Environmental Management System

Suppliers shall carry out operations with care for the environment and must comply with all relevant laws and regulations regarding the protection and preservation of the environment. All required permits, licenses and registrations will be obtained, maintained and kept up to date.

Suppliers shall maintain and operate an Environmental Management System (EMS) covering their business operations and manufacturing processes, as applicable. The content of this EMS shall be in line with the requirements of ISO 14001, covering:

- Environmental policy;
- Planning;
- Implementation and operation;
- Checking; and
- Management review.

Resource Conservation

Suppliers shall undertake best practice actions with regard to energy and water management and conservation, to minimise the environmental impact of their operations processes.

Suppliers should engage in the development and use of climate-friendly products/materials and processes, looking at the principals of circularity, to reduce virgin and non-renewable resource consumption.

Suppliers should monitor and report on resource consumption across their operations, including energy, water, and materials.

Waste

Suppliers shall ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes and to mitigate their effects, for all waste streams, including hazardous waste.

Suppliers shall dispose of waste responsibly, using approved, registered waste contractors.

Suppliers should observe the waste hierarchy, and minimise waste within their operations and supply chain, where practical.

Localised Emissions

Suppliers shall monitor all localised emissions to their operations. Suppliers should seek to reduce air emissions and water discharge within their operations where practically possible and strive to achieve best practice with regards to the quality of emissions beyond legislation.

Ethical Employment Practices

Kingspan supports the protection of human rights and expects its Suppliers to observe the International Bill of Human Rights¹. Where a Supplier is found not to observe the International Bill of Human Rights ("IBHR"), it shall be immediately required to change its work practices so as to place them in-line with the objectives of the IBHR, with a failure to do so constituting a material breach of the contractual relationship between the parties. Kingspan Suppliers are expected to support Kingspan's commitment to respect human rights through:

Child Labour

Kingspan is guided by the International Labour Organisation ("ILO's") Core Conventions, and as such requires its Suppliers not to utilise any form of child labour in their business operations.

Anti-Slavery

Suppliers are required to ensure that all work relating to their operations is completed voluntarily and without slavery, servitude, forced or compulsory labour or human trafficking. Workers shall have the freedom to terminate their employment with the respective Supplier at any time without penalty, upon giving reasonable notice.

Compliance with Immigration Laws and Regulations

Suppliers must ensure that all employees have the legal right to work and any migrant workers should be in possession of a valid work permit issued by the relevant authority.

Working Hours

Suppliers are required to comply with all applicable laws pertaining to working hours, but at the very minimum must ensure that working hours are not excessive and that no worker shall be made to work overtime under the threat of penalty, dismissal, denunciation or as a disciplinary measure.

Working Environment

Suppliers will provide their employees with a workplace free of discrimination, harsh and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.

¹ Comprising the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil Rights.

Supplier Policy

Suppliers will comply with all applicable health and safety regulations

Suppliers shall have adequate management systems to predict hazards and protect the health and safety of all people at their place of work and under their control. This must include a formal and regular assessment of risks, implementation of safe systems of work, the reporting of incidents and a programme of continuous improvement in safety performance.

Suppliers shall protect their employees from any workplace hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees.

Equality

Suppliers shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class.

Anti-Bribery and Corruption (“ABC”)

Kingspan does not tolerate bribery and corruption in any form. Kingspan expects that its Suppliers shall maintain the standards set by Kingspan, and to that end, Kingspan requires its Suppliers to ensure that its employees are prohibited from offering, promising, requesting, accepting or agreeing to accept anything of value to or from any person for the purpose of improperly obtaining a commercial advantage or inducing the other party to act in a manner that is improper. Kingspan also requires its Suppliers to maintain appropriate policies to prevent bribery and corruption.

Kingspan requires its Suppliers not to make facilitation payments irrespective of local custom, to include appropriate ABC clauses in contractual arrangements within the Suppliers’ supply chain.

Raising Concerns

Kingspan is committed to conducting its business activities to the highest standards of integrity. In support of this objective, Kingspan maintains a confidential independent service for raising concerns and expects its Suppliers to strongly encourage their employees to raise concerns through this service should they encounter conduct of Kingspan or its employees which fall short of the standards contained in this Policy.

The Confidential Independent Service for Raising Concerns can be accessed [here](#).

Terms and Conditions

Kingspan reserves the right to terminate a supplier relationship in the event that the Supplier fails to uphold the standards as contained in this Policy. Kingspan will work to integrate the principles as contained in this Policy into all current and future supplier contracts, requests for information and tender documents. Adherence to this Policy will increasingly become a key component of future terms and conditions of doing business with Kingspan. As a demonstration of this, Kingspan will seek to include the following clause into all of our standard terms and conditions of purchase:

“The Supplier acknowledges that the Kingspan Supplier Policy is incorporated into the terms of this [Supplier Agreement] by reference and any failure on the part of the Supplier to observe the Kingspan Supplier Policy shall constitute a material breach of the terms of this [Supplier Agreement]”.

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