

	ETHICAL TRADING POLICY STATEMENT	Ref:	IMS doc 134
		Issue:	5
		Date:	Apr 2017

Clifford Devlin is committed to supporting the key principles of ethical trading i.e. integrity, transparency, environmental impact and working conditions. Our Ethical Trading Policy commits the organisation to openness and honesty in all business transactions and to only purchase goods and services that are produced and delivered under conditions that do not involve the abuse or exploitation of anyone and that those goods, services or products provided do not have a significant adverse effect on the environment.

Procurement

Clifford Devlin will be open, transparent and fair in its communications and dealings with business partners and other stakeholders affected by its activities. Our policy is to select business partners on the basis of their ability to deliver best value to us and our clients and in doing so, help drive ethical practice through our supply chain.

We will continuously assess and audit the suitability of prospective and existing supply chain partners with the respect to their own ethical credentials. Preference will be given to suppliers and sub-contractors that are able to demonstrate synergy with our principles of social, economic and ethical responsibility. Where possible we will seek to source good and services from partners that are based locally to support the social and economic well-being of the communities we serve. No bribery and corruption will be tolerated when selecting or negotiating with our supply chain.

Human Impact

We support the principles of the Ethical Trading Initiative's Base Code with respect to the rights of labour and as a company we are committed to ensure the following minimum standards of work are implemented through the choices we make in our business transactions:

- § Employment is freely chosen.
- § Freedom of association and the right to collective bargaining are respected
- § Working conditions are safe and hygienic
- § Child labour is not be used
- § Living wages are paid
- § Working hours are not excessive
- § No discrimination is practised
- § Regular employment is provided
- § No harsh or inhumane treatment is allowed

It is our policy to avoid business dealings with clients, supply chain partners and other stakeholders that are not able to demonstrate their ability to uphold these key principles.

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Environment

Clifford Devlin will acknowledge and consider the environmental performance and impact of the goods and services we purchase. Where possible we will:

- § Reduce consumption of natural resources by endeavouring to purchase from sustainable sources
- § Minimise the carbon footprint of our activities by purchasing local goods and materials with low embodied carbon
- § Give preference to suppliers that are able to demonstrate their own environmental credentials.



Tim Clifford

Managing Director, Clifford Devlin Limited

4th April 2017