

OT Group Procurement Policy Statement

Purpose and Application

This Policy seeks to outline a set of overarching set of principles that define our vision of Procurement within OT Group whilst setting clear standards and objectives for our business in its purchase of goods and services. Recognising that the decisions we make today must balance financial, environmental, and ethical sustainability whilst representing value for money for our customers and alignment with the core values of our business.

This Policy applies to all employees involved in; or supporting the purchase of goods and services on behalf of OT Group or its customers. The 'Purchase' of goods and services includes all procurement activities including leasing and hiring of equipment and ancillaries and may where appropriately include wider activities accompanying the life cycle of goods (or service contracts) and the end-of-life disposal (whether they remain in OT Group ownership). Adherence to the purchasing policy is both an individual and a corporate responsibility. Wilful breach of this policy, or unauthorised departure from this policy, may constitute a disciplinary offence.

Note that whilst this Policy Statement is intended to be provisionally externally facing, detailed business procedures are to be considered confidential. Although there are cases where suppliers and 3rd parties will need to be provided details of individual procedures, a signed confidentiality agreement must be obtained prior to provision.

This Policy Statement can only be revised or altered with the authority of the leadership team. It is only permissible to modify or over-ride individual elements of procedure, after appropriate consideration and prior authorisation has been obtained.

Policy Objectives

The purpose of this document is to establish and enforce the underlying principles of Procurement for all activities considered in scope. This will ensure that OT Group is able to secure the required materials, supplies, equipment, and services at the appropriate quality, achieving the most economically favourable terms in a timely manner and at the same time ensuring that good procurement practices are adhered to for the following objectives.

- To be compliant with all applicable UK laws and associated business requirements
- To be accountable and auditable for the decision process
- We will use principles of best practice
- To source the right goods/ services from the right source at the right time
- To minimize the total cost of ownership by identifying fit for purpose goods & services
- To consider ethical, environmental, and social aspects as part our business processes
- To consider supply chain risk as part of the equation

Note. There are no circumstances in which it is permissible for the purchasing activity or those engaged in it, to consciously break, or knowingly to risk breaking, the laws and business principles that apply.

Accountability and Auditability

OT Group will maintain systems, whether manual or electronic, that will, for all purchases, contracts, and external commitments above the level of 'petty cash' and minor allowable personal expenses, record, identify and as appropriate provide justification for.

It is not permissible to requisition or buy goods or services or commit OT Group as a business or its funds without providing an official purchase order with the minimum detail, quantity, price, specification and delivery date and location or contract. All contracts that are agreed must have followed the current approval matrix.

All purchases of goods and services will be made using OT Group's 'Standard Terms and Conditions' of purchase, or by use of a formal contractual agreement signed by both parties. OT Group does not trade on supplier's terms and conditions without prior review and agreement by OT Group inhouse Procurement and Legal functions. It is a fundamental of the policy statement that as far as is possible (and subject to the Procedures for low-value purchases), the requisitioner, the buyer, negotiator or contractor, and the authoriser of payment, will be different persons, all identifiable in the records maintained.

Fair Business Practices

OT Group conducts its business and activities in a competitive manner and expects its suppliers, subcontractors and agents do the same. Suppliers shall not violate applicable antitrust and anti-competition laws, rules and regulations, which, among other things, prohibit price-fixing, dividing territories and bid-rigging.

OT Group shall employ fair business practices and shall be accurate and truthful in their advertising and representations regarding their products and services.

OT Group's dealings and transactions with suppliers will be at arms-length. To that end, OT Group's suppliers and employees must not be in a situation where a conflict of interests is allowed to exist because of a family relationship, a personal relationship, a business relationship, an investment or due to some other connection or relationship. Any such relationship or investment that could possibly give rise to a conflict of interest must be promptly disclosed prior to engagement or start of process.

OT Group's suppliers are expected to report suspected and actual violations of these guidelines promptly and diligently, and any other unethical or illegal activities to OT Group.

Quality

OT Group recognise that Quality Management is critical to all aspects of operations and will strive to ensure that all suppliers are providing products in accordance with the agreed specifications supplied with the Purchase Order or to a pre-agreed contract and in accordance with all relevant standards.

Use of Suppliers

OT Group seeks to do business with Suppliers who commit to acting with integrity and responsibility. A Supplier that does not act with integrity could cause serious reputational, operational and financial harm to OT Group and its customers.

Suppliers will provide information as part of OT Group's onboarding and due diligence process, which is managed via our due diligence platform. OT Group expects that its suppliers have programmes in place, throughout their own activities to review this supply chain to minimise, record and report on

- Employment Practice Issues
 - Human Rights abuses
 - Modern Slavery exploitation
 - Discrimination o Equal Opportunity issues
- Environmental issues
- Bribery & Corruption
- Conflict minerals use
- Quality issues

Business Continuity OT Group expect all suppliers to agree to the principles and undertakings of its 'Supplier Code of Conduct'. In addition, it is OT Group's objective that, as far as is reasonably practical, it will only employ suppliers and 3rd parties who subscribe to and operate on similar principles.

Overseas Sourcing activity

It is not acceptable for OT Group employees to source goods or services in a foreign territory solely in order to allow an activity to occur which would not be permissible in OT Group home territory, and/or in those territories to which OT Group goods and services are supplied (note that this does not preclude taking advantage of lower labour costs elsewhere, provided that these, and the associated conditions, at least meet the domestic norms of that territory).

OT Group is committed to the fair and effective application of laws and regulations. There is therefore a positive duty on OT Group and its employees to report and refer any and all reasonably founded suspicions of illegal activity (for example, attempts at corruption, evidence of anti-competitive or cartel-like activity, breaches of employment or environment law).

Supplier Diversity

OT Group encourages diversity in its supply chain, providing equal opportunities to a vast range of businesses regardless of location and size. OT Group wishes to work with a range of diverse suppliers and recognise the innovation that a diverse supply chain can bring to its business and customers.

Environmental Aspects

OT Group's sustainability ambition focusses on providing the information to allow our stakeholders to make informed, responsible choices about the sustainability of our products and services, including:

- Measurement of carbon footprint across the lifecycle of our products and services to enable reduction of carbon footprints and options for carbon neutral products and services.
- Offer recyclable products by ensuring sustainability is 'designed in' to products and services.
- Identify opportunities to embed social value into our supply chain and products and services.

OT Group is committed to reducing the environmental impact not just its own activities, but throughout the lifecycle of its products and services. This includes (where possible) identifying the environmental impacts associated with the products and services OT Group's supply chain provides.

Note: OT Group considers energy efficiency of products and services and energy and waste management practices of potential supply partners as part of its on-boarding process.

We encourage suppliers to bring innovations to products & services that will:

- Reduce waste through re-use and recycling and by using refurbished and recycled products and materials where practical.
- Develop and introduce goods and services that reduce the environmental impacts, including carbon emissions, waste and use of raw materials processes and procedures at competitive prices.
- Bring opportunities to add social value and / or contribute to a fairer, more equitable society.
- Ensuring products derived from the natural environment, such as wood and paper, are from sustainable sources and comply with EC and international trading rules.

Data Governance

OT Group are trusted by their clients to securely process vast quantities of data. To ensure that trust is not misplaced OT Group has made a conscientious commitment to extend its stringent data governance programmes to its suppliers.

OT Group has a level of expectation for suppliers who have access to any form of OT Group data or client owned data. The supplier will be required to complete the OT Group 'Supplier due diligence' process. Depending on the responses to this questionnaire, OT Group may require additional communication with the supplier.

Regulatory and Reputational Risk

OT Group sources a wide range of products and services from a diverse and global supplier base. A supplier's misconduct could cause serious reputational damage to OT Group and its clients.

OT Group expect suppliers to operate with integrity and responsibility. OT Group will never purchase from any individual or organisation listed on the 'Consolidated United Nations Security Council Sanctions List'