

THE
KENTON
GROUP



Corporate and Social Responsibility Policy

Corporate and Social Responsibility (CSR) is defined as the integration of business operations and values, whereby the interests of all stakeholders including investors, customers, employees, the community and the environment are reflected in the company's policies and actions.

Commitment

The Kenton Group of Companies (TKG) are committed to:

- Continuous improvement in our Corporate and Social Responsibility (CSR) strategy.
- Encouraging our business partners to strive for matching performance.
- Acting in a socially responsible way.
- Continually improving our performance and meeting all relevant legislation.
- Encouraging our staff to be mindful of the effect of their actions on any natural resource.

Purpose and Aims

The purpose of the policy is to make clear to all stakeholders, what we mean by CSR and how TKG

propose working towards achieving it. The CSR policy applies throughout all of the Procurement

chain and governs the approach to all activities.

In implementing this policy TKG aims to:

- Be responsible.
- Be an example of good practice.
- Set Standards of business conduct.
- Recognise that good CSR embraces all aspects of sustainable development and the way TKG affect people through our business operations.
- Assess which social issues are of most relevance to the contract and decide at what stage in the procurement lifecycle this social policy could most effectively and legally be included.
- Operate in a way that safeguard against unfair business practices.
- TKG believe that a responsible approach to developing relationships between companies and the communities they serve, global or local, is a vital part of delivering business success.
- When carrying out our business, in consultation with our customers, the Company will determine the environmental, social and economic issues.
- Contracts will clearly set out the agreed terms, conditions and the basis for our relationship.

- Continually review our policies and business practices to encourage engagement with small and medium enterprises and to promote the development of the regional supply chain.

Corporate Governance

- TKG will share and declare information on personal and corporate conflicts of interest and seek guidance from higher authority before acting.
- The Group are committed to ensuring that business is conducted in all respects according to rigorous, ethical, professional and legal standards.
- Laws that regulate and apply will be fully complied with.
- TKG will endeavour to ensure, that stakeholders have confidence in the decision-making and management processes of the Procurement Service, by the conduct and professionalism of all staff. TKG will carry this out by continually training and developing staff.
- All groups and individuals with whom TKG have a business relationship will be treated in a fair, open and respectful manner.
- Competition will be reasonable and based upon the quality, value and integrity of the products and services supplied.
- Feedback on performance will be actively sought, and will be continually reviewed to ensure best practice is observed at all times.
- TKG will allow customers and vendors to give feedback on our performance and ensure that all customer comments are analysed, responded to and where appropriate acted upon.
- An Action Plan will be developed to ensure continuous improvement is achieved.

Environment

The Company's objective is to endeavour to reduce our impact on the environment through a commitment to continual improvement.

- TKG will continue to work with our vendors to reduce their impact on the environment.
- Assess production, use and disposal associated with the products we use.
- Customers will be informed of the key issues involved in procurement so they can make informed purchases to reduce their impact on the environment.
- TKG will ensure that paper products used come from forests independently certified as well-managed according to the standards of the Forest Stewardship Council (FSC), or from recycled materials.

Human Rights

The Company aims to support and respect the protection of internationally proclaimed human rights. Vendors are actively encouraged to observe international human rights within their work environment.

Equality and Diversity

TKG aims to eliminate discrimination on any grounds and promote equality of opportunity in the supply chain

- Ensure that our customers and vendors are able to work together in confidence and be treated with respect by each party.
- Our range of contracts will take into account the needs of a diverse customer base.

Sustainability

A Sustainable Procurement Policy will be maintained. This will set out the principles, policies and procedures, on which sustainable business activity within the Company, will be based.

The policy will act as a prompt to staff to consider sustainability as a factor in all purchasing decisions.

TKH will seek to minimise the adverse environmental effects of people travelling to and from our office and customer premises.

Impact on Society

TKG will take steps to understand how we can most effectively support the needs of the local

community and implement initiatives accordingly.

Impact on the local and wider community will be understood and nurtured.

Dialogue with local communities shall be encouraged for mutual benefit.

Ethics and Ethical Trading

TKG will ensure clear visibility through our supply chains, so we know where all our products are made.

Training will be provided to relevant people on environmental and social issues affecting our supply chain. We will ensure that vendors uphold the workplace standards and behaviours consistent with the Company's requirements.

Biodiversity

TKG actively encourage the use of sustainable practices in the maintenance of the Company grounds and premises.

Vendors (Suppliers)

Vendors will be encouraged to help TKG achieve our policy aspirations in the delivery of our products and services.

TKG will encourage vendors to adopt responsible business policies and practices for mutual benefit.

Vendors are regarded as partners and TKG will work with them to help achieve our policy aspirations in the delivery of our products and services.

A documented environmental and social assessment will be undertaken for every new contracted vendor

TKG are committed to ensuring that the welfare of workers and labour conditions within our supply chain meet or exceed recognised standards.

Where necessary, TKG will exert procurement pressure to ensure that all of our vendors behave in a socially responsible way. This includes environmentally-friendly products and making sure that workers are treated properly.

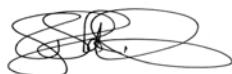
Where appropriate, our tender specifications include questions to reflect our desire for sustainable procurement.

TKG hold regular meetings with vendors to support these ideas.

TKG will continue to work with vendors to:

- Promote more environmentally friendly products to our customers
- Reduce the amount of packaging and transit where possible.
- Implement schemes to take-back, recover, re-use and recycle products at the end of their use/life in accordance with our WEEE policy.

Signed



Dated 03rd October 2018

John Larkin Managing Director

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