	ICD EUROPE – RESPONSIBLE PROCUREMENT POLICY			
	Document Ref:	ICD-E-004-10		
	Issue No:	1	Revision No	2
	Issue Date:	11/10/23	Revision Date	10/10/24
ICD EUROPE LTD				

Responsible Procurement Policy

Description

One of ICD Europe Ltd's commitments to sustainable business practices is our efforts to ensure responsible purchasing and procurement within our business activities. We expect our suppliers to meet our requirements of Health and safety, environmental, ethical and human rights standards. We also encourage our suppliers to promote these values with their business partners and work with us to improve and develop sustainable procurement practices throughout the whole supply chain.

Purpose and Scope of Policy

This Policy sets out ICD Europe Ltd's position, in a safe and sustainable way. On purchasing and procurement provides guidelines aimed at:

- Ensuring compliance with all Occupational health and safety, ethics, environmental and human rights laws, rules, and regulations not just within the UK but in any other country within which ICD Europe Ltd may carry out its business or in relation to which its business may be connected.
- Enabling employees, suppliers & persons associated with ICD Europe Ltd to understand the risks associated with these areas to encourage them to be vigilant and effectively recognize areas for improvement and implement these proactively.
- Providing suitable and secure reporting and communications channels and ensuring that any information that is reported properly and effectively with; and
- Creating and maintaining a rigorous and effective framework for improving sustainable practices throughout the whole value chain.

This Policy applies to all permanent and temporary employees of ICD Europe Ltd (including any of its intermediaries, subsidiaries, or associated companies). It also applies to any individual or corporate entity associated with ICD Europe Ltd or who performs functions in relation to, or for and on behalf of, ICD Europe Ltd including, but not limited to, associates, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers, and sponsors ("associated persons"). All employees and associated persons are expected to adhere to the principles set out in this Policy.


Policy Statement

ICD Europe Ltd commits to;


- Evaluate and work with its supply chain improve sustainability performance.
- Develop procurement solutions in line with regulatory requirements as well as all customer and interested parties' expectations.
- Increasingly develop procurement strategies to closely align with our policy commitments. We aim to source 100% of our material from A-rated suppliers.
- Communicate with our suppliers to identify areas of improvement, we provide a code of conduct and performance scorecards for our top ten key suppliers and engage in dialogue when required to drive improvements on a risk based schedule.
- ICD Europe will monitor this through supplier assessment and on-site audits and follow-up plans. External sources of verification may also be used to this track this objective.
- ICD Europe Ltd, as set out in our contract's terms and conditions as well as the supplier code of conduct, reserve the right to disengage or limit supply from suppliers not upholding the terms and conditions or requirements of the ICD Europe Ltd code of conduct.

ICD Europe Ltd recognizes that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy and our ICD Europe Ltd Code of conduct is expected of all employees, suppliers, and associated persons, at all times.

At ICD Europe Ltd we believe in doing business the right way. We aim to build long term commitments and partnerships with both our suppliers and customers and as part of this we take our Corporate social responsibility seriously. The practices below are how we aim to conduct business and our suppliers are an integral part of this effort, we expect that our suppliers accept, embrace and enact the values laid out and stimulate others to follow suit within their sphere of influence. We will work together with our suppliers with the intent of reducing any negative impacts and enhancing the positive aspects, we encourage all suppliers to go 'beyond compliance' and make every effort to improve their sustainability and social responsibility credentials through continuous improvement.

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- **Health & Safety** – Health and safety is paramount to ICD Europe Ltd and its partners, we must create a healthy and safe working environment compliant with all laws, regulations and best practices.
- **Professional conduct** – ICD Europe Ltd reflect each others values and work constructively and collaboratively towards common goals. Everyone has the right to be treated fairly, free from harassment, discrimination or victimization and robust measure are in place to prevent infringements of human rights and ethical standards.
- **Risk management** – We conduct risk assessments across all facets of our operations and expect supplier to conduct similar exercise to mitigate any negative effects that can be reasonably foreseen.
- **Transparency** – ICD Europe always seek to be transparent in our dealings with suppliers and customers and expect to be open, honest and about business practices, this involves being allowed reasonable access to visit and audit our suppliers.
- **Human Right & Modern Slavery** – ICD Europe have a zero tolerance approach to Modern slavery and human rights violations, we act with due diligence to ensure this is the same for our business partners and suppliers, this involves ensuring no inhumane treatment, child labour, forced labour, fair working hours and remuneration and freedom of association within our supply chain.
- **Anti Bribery and Corruption** – Suppliers must ensure they act in accordance with all anti-bribery and anti corruption laws in countries which they conduct business, ICD expects that all suppliers have procedures in place and channels to report potential breaches
- **Conflict free** – As a responsible participant in the metals industry ICD Europe Ltd we are fully committed to ensuring all minerals and materials are from conflict free areas. All Suppliers must support and follow OECD Due Diligence Guidelines for responsible supply chains as well as conforming to strictly EICC rules.
- **Whistleblowing** – ICD has formal mechanisms in place for whistleblowing, so that breaches of law or policy can be reported anonymously and without fear of retaliation, we encourage all our suppliers and business partners to have procedures in place to deal with any contraventions.
- **Information Security** – ICD Europe Ltd and its partners must always be fully compliant with any relevant data protection laws, all data must be held in a responsible manner and suitable cyber security measures in place to prevent and mitigate and security breaches and provide adequate back up for data recovery.
- **Competition** – ICD Europe expects its suppliers to conduct business fairly and independently in the market which they conduct business. Suppliers must ensure they comply with all competition and antitrust legislation.
- **Environmental compliance** – ICD Europe are striving to do business in a environmentally friendly manner and we expect all our suppliers to ensure full compliance with their relevant environmental regulations and to promote these values in their business activities, this includes but is not limited to;
 - **Sustainable Procurement** – Ensuring their own partners have systems in place to promote sustainability in their supply chain in line with our Supplier code of conduct.
 - **Carbon Reduction** – engage in carbon reduction strategies to track and reduce its carbon footprint,
 - **Energy Reduction** – Engage in using lower energy technologies and renewable generation ICD is committed to working with all suppliers to ensure improvements and progress is made towards our sustainability goals.
 - **Waste reduction** – Ensuring waste management is a high priority and wastes are disposed of in accordance with regulations in a responsible manner following the waste hierarchy.

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Responsibilities and reporting.

ICD Europe Ltd encourages all employees, suppliers and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed, and any action can be taken expeditiously. In the event, that you wish to report an instance or suspected instances of unacceptable conduct you should speak directly to one of the Directors. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. ICD Europe Ltd will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment for reporting genuine concerns.

Record Keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off the record” to facilitate or conceal dealings.

Sanctions for breach

Breaches of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with ICD Europe Ltd disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal. As far as associated person’s are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract, or other agreement.

Monitoring Compliance

ICD Europe Ltd Directors have lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the directors of ICD Europe Ltd who have overall responsibility for ensuring this Policy complies with ICD Europe Ltd legal and ethical obligations. Suppliers will be monitored through methods such as assessments, visits & audits as well as through 3rd parties verification results.

Training

ICD Europe Ltd will provide training if required to all employees or associated persons to help them understand their duties and responsibilities under this Policy. We will also communicate these requirements through our supplier code of conduct.

Review

Within the Company, the suitability and effectiveness of all our policy and management system is reviewed at senior management meetings annually. This policy is communicated to all staff and interested parties on request.

Responsibility for authorizing, implementing and communicating on behalf of ICD Europe Ltd.



Wayne Hawkes

Managing Director

Next Review Due: Oct 2025

