

# SUSTAINABLE PROCUREMENT POLICY

## Intent & Purpose

Springmount Services is committed to delivering procurement with positive impacts on the three pillars of sustainability; environment, social and economic. This Policy formalises the intent of Springmount Services to procure goods and services to minimise adverse impacts across the entire life cycle of our services and products by managing our procurement decisions to reflect positive environmental, social, and economic outcomes.

## Operation and Incidence

### Context

Springmount Services can make a difference as a company by improving productivity, assessing value and performance, enabling communication between our purchasing team, suppliers and internal and external stakeholders and through innovation. We will minimise adverse impacts across the entire life cycle of our services and products by managing our procurement decisions to reflect positive environmental, social and economic outcomes.

### Application

This Policy applies to all Springmount Services employees, contractors, and suppliers.

Minimum requirements of our Suppliers:-

- Suppliers are required to respond to requests for information from Springmount Services, consumers and/or customers with appropriate information concerning their products and operations.
- Suppliers are prohibited from participating in or tolerating any forms of corruption, bribery, extortion, or embezzlement.
- Suppliers are required to maintain sound and stable financial controls commensurate with the scale and scope of their business operations.
- Suppliers are required to implement appropriate safeguards to protect confidential information and/or intellectual property of their business partners and personal data and/or personal information, including, but not limited to, individual's privacy.

Preferred Practices of our Suppliers:-

- Suppliers demonstrate compliance with our Policies by reporting to Springmount Services annually, via questionnaires or direct communication.
- Suppliers implement transparent management practices, including policies, supplier selection criteria, record keeping, reporting, and response procedures for consumer and/or customer requests, which can be shared with their business partners.
- Suppliers install grievance mechanisms that allow for anonymous comments, which are kept on record, and procedures are established to take appropriate actions to remediate any issues that have been identified through this mechanism.

### Principles

We are committed to responsible purchasing and purchasing products and services that are ethically produced, sustainable, and minimises environmental impact. Our principles are:-

- Accountability
- Transparency
- Ethical behaviour
- Full and fair opportunity
- Respect for stakeholder interests
- Respect for the rule of law and international norms of behaviour

- Respect for human rights
- Entity based solutions
- focus on needs, including demand and sustainable alternatives
- integration across the supply chain
- analysis of all costs over the life cycle, including benefit to society, environment, and economy resulting from procurement activities
- continual improvement

### Sustainable Procurement Operations

We will assess sustainable procurement outcomes related to all procurement activity and consider:

- value-for-money over the whole of life, rather than just the initial cost
- minimising environmental impacts over the whole of life of the goods/services/works
- strategies to avoid unnecessary consumption and manage demand and minimise waste
- our supplier's social responsibility practices, including compliance with legislative obligations to its employees
- our obligations under Human Rights legislation and our relationships with our First Nations people
- where appropriate, we will work with local and community organisations to facilitate these outcomes

We will use resources effectively, economically, and without waste, with due regard for a procurement arrangement's total costs and benefits. The principle of the best value for every dollar does not necessarily mean selecting the lowest price response; but rather the best possible outcome for the total cost of ownership (or whole-of-life cost).

Our sustainable procurement approach will utilise our size and buying power to ensure the best value is being realised. In the first instance, all planned procurement should be considered a potential opportunity to leverage our size for cost reduction and value optimisation and influence the market on our sustainability objectives through all stages of the procurement lifecycle.

### Subordinate documents

SMS 6072 DOC Sustainable Procurement Strategy      SMS 6003 PRO Procurement Grievance Resolution  
 SMS 6073 DOC Sustainable Procurement Framework      SMS 6071 FOR Supplier Evaluation Form

Our governing framework is integrated within all our management systems aligned to our company objectives and practices.

### RACI

Responsible	It is the responsibility of GM Corporate Services to implement, maintain and communicate this Policy.
Accountable	The final authority for this Policy lies with the Managing Director.
Consulted	When making changes to this Policy, a consultation should be carried out with the leadership team.
Informed	All changes to this Policy should be communicated to all leaders.

*Whilst accountability for sustainable procurement sits within our leadership teams and responsibility falls on those undertaking procurement activities, contributions from everyone involved in or supporting, those procurement activities are essential in ensuring the most significant impact to sustainable well-being is achieved.*

### Breach of The Policy

Breach of this policy may be regarded as misconduct, leading to disciplinary action, which may result in termination of employment or engagement. An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.