

### Code of Business Standards and Ethics

A Framework for Sustainable Decision Making



# Message from the Director

Sustainability has climbed the priority ladder to tackle current issues that societies are facing, such as climate change, scarcity of resources, and social inequalities. As a business, and when we are part of such societies, we know that we have the risk to adversely contribute to these issues. Out of this concern, Premium Partners has redefined its strategy and business objectives to contribute positively to a more sustainable world. Businesses are meant to make profit but this will not be regardless of the impact on society and the environment

We have put down a sustainability policy to establish the framework of sustainability management system at Premium Partners to set, implement, and monitor sustainability objectives as part of the company's strategy and operations. It defines the company's practices, policies and procedures at the management and operations level that will help prevent our risks, identify opportunities, and build a sustainability profile. All together to support our strategy of being the transformative partner that offers full service solutions with sustainability and creativity at its core.

At Premium Partners, we are an extension to our clients and the society we operate at. We partner with our suppliers for the purpose of delivering results with people, profit, and the planet in mind. Out of this, we have confirmed our support of the 10 Principles of the United Nations Global Compact on human rights, labor, environment and anticorruption.

#### **Human Rights**

We will support and respect the protection of internationally proclaimed human rights; and make sure that we are not complicit in human rights abuses.

#### **LABOR**

We will uphold the freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced and compulsory labor the effective abolition of child labor; and the elimination of discrimination in respect of employment and occupation.

#### **ENVIRONMENT**

We support a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility; and encourage the development and diffusion of environmentally friendly technologies.

#### **ANTI-CORRUPTION**

We will work against corruption in all its forms, including extortion and bribery.

We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

## COBE

#### In this document:

'Group' means Premium Partners EU and its affiliates and subsidiaries

'Team' includes all permanent employees, contractual, or freelancers of the 'Group'

'Partners' includes all suppliers, service providers, clients, or any side dealing with the Group other than the Team

'COBE' refers to this Code of Business Standards and Ethics stated in this document and/or adopted locally by The Group

Laws and International Standards include all applicable national laws and regulations

**Towards Sustainable Procurement** 







**ENVIRONMENT** 







Premium Partners supports the Sustainable Development Goals









January 31, 2022 Code of Business Standards and Ethics

### Ethical Business

# SUSTAINABLE GALS DEVELOPMENT GALS















12 RESPONSIBLE CONSUMPTION



13 CLIMATE ACTION



14 LIFE BELOW WATER













### Data Confidentiality and Privacy

We work with our Partners, Group, and Team based on trust and transparency and we understand due to work relation some data, that is considered personal, might be collected. For this, Premium Partners work with its employees, customers, and suppliers with minimum data collection in mind.

We aim to work within a framework where handling personal information is done in a confidential and secure manner to meet ethical and legal standards under the framework of GDPR. This enables the Group and team to handle personal information in the most ethical, private, secured, and transparent way to deliver the best service to our clients.

### **Privacy Policy**

Premium Partners defined its Privacy Policy where the type of data collected and the purpose of this collection is identified. We should keep in mind the privacy and confidentiality of our customers when dealing with or handling personal data. Any breach or risk of breach should be reported to the line manager or to the usual contact person in case the subject is outside of the company. Or for keeping matters confidential, an email can be sent to <a href="mailto:privacy@premium-partners.com">privacy@premium-partners.com</a>

### **Confidential Information**

Confidential information is any information or knowledge which may prejudice the Group's interest if disclosed to third parties, such as:

- ✓ Sales, suppliers, and other company's database
- ✓ Pricing and accounting information
- ✓ Confidential product information and trade secrets
- ✓ Personal data and matters affecting employees
- ✓ Software, processes, or business ideas developed by the Team or Group.

All employees of premium partners are expected to read and sign the non-disclosure agreement

### **Disclosing Confidential Information**

We must not disclose confidential information relating to the Group, Team, and/or Partners without proper authorization.

#### **Access to and Storage of Confidential Information**

Access to confidential information relating to the Group, Team, and/or Partners should only be provided to employees requiring it in order to carry out their work. We must not take home any confidential information relating to Group or its business without making adequate arrangements to secure that information.

We must not use confidential information relating to the Group or its business or that of a partner for our own financial advantage or for that of a friend or relative

At the same time, we must not solicit or willfully obtain from any person confidential information belonging to another party.

If you are faced with a situation where you are exposed to confidential information, you should immediately notify your line manager.

Review of the Data Protection Policy, Privacy
Statements, and Personal Data Management is
needed for full understanding of handling and dealing
with personal and confidential information.



### Conflict of Interest

Premium Partners is a signatory to the United Nations Global Compact and its ten principles on human rights, labor rights, environment and anticorruption, which are incorporated into our internal policies. Working with business ethics involves, as a minimum, complying with all applicable laws and regulations, as well as Premium Partners' internal policies and agreements with shareholders, customers and subcontractors.

Acting in our company's best interests We must avoid situations where our personal interests may, or may appear to, conflict with the interests of the Group. Many situations or relationships have the potential to create a conflict of interest, or the appearance of one. The most common ones are set out in this document. Generally speaking, a conflict of interest is a situation where our position or responsibilities within the Group presents an opportunity for us or someone close to us to obtain personal gain; or benefit (apart from the normal rewards of employment); or where there is scope for us to prefer our personal interest or of those close to us, above our duties and responsibilities to the Group. A situation will appear to be a conflict of interest if it provides an opportunity for personal gain whether or not that gain, or benefit is obtained. **Disclosing conflicts of interest** as soon as an actual or potential conflict arises, you must disclose it to the line manager. Following your disclosure your line manager should engage with you to assess if there is any potential risk to the Group with the actual or potential conflict. A potential conflict must be notified. even though it may seem remote, so that higher management can be made aware of the situation if necessary.

**Family or personal relationships** You must disclose if you have any close relatives: working in the Group to the best of your knowledge, working or performing services for, or having a material financial interest in, any competitor, supplier, customer or other business with which the Group has significant dealings

'Close relative' means spouses, partners, children, parents, siblings, nephews, nieces, aunts, uncles, grandparents and grandchildren (including where arising by marriage). Intimate relationships between employees in a direct or indirect reporting line can also lead to a conflict of interest, or the appearance of one. A direct reporting line is your manager and an indirect reporting line is all managers above your line manager up to the head of your function. If you are in such a situation, you should disclose the relationship. Where there is no reporting relationship, management should keep the situation under review to prevent any unfairness or undue influence arising. In the course of your work, you should not have: the ability to hire, supervise, affect terms and conditions of employment, or influence the management of close relatives. You must not hold material financial interests in a supplier or customer if you have any involvement in the Group's dealings with that supplier or customer or supervise anyone who does a competitor of the Group, or any business conducting activities against the Group's interests. Outside employment You must not work for or on behalf of a third party without first disclosing your intention to do so and obtaining written approval from line management. If you are a full-time employee such work must not take a significant amount of time, should not be in agreed working hours, should not impact your performance or in any way interfere with your duties and responsibility to the Group. Some situations are never permissible, for example, if they involve a competitor of any of the group, a customer, or supplier you deal with in the course of your work



### Anti-Bribery and Corruption

We work with ethics and we make sure our Team and Partners do the same. In such, Premium Partners doesn't engage in corrupt practices. The team may not make illegal payments to government officials themselves or through a third party or to partners.

The team is not allowed to accept business gifts or entertainment that would constitute a corrupt activity.

We are globally positioned while ensuring compliance with all applicable laws and regulations wherever we are.

### **Acting with Integrity and Ethics**

When the Group and its partners do things the right way and adhere to the highest ethical standards, they build trust. Ethical behavior helps us preserve and improve our life, which is the goal of our business. Unethical behavior by employees, third parties or employees of third parties conducting business on behalf of the Group will not be tolerated.

We focus on preventing bribery and corruption since we believe it is the right thing to do and because such acts jeopardize public trust and cost people their freedom, health, education or financial livelihood. Not to mention, nearly every country has laws that prohibit bribery and corruption. Countries that have anti-bribery and anti-corruption laws are working to enhance them. Countries that don't have anti-bribery and anti-corruption laws are in the process of creating them. These laws are here to stay, will strengthen over time, and are designed to protect the Group, Team, and Partners and all concerned stakeholders.

We choose to be guided by the United Nations Convention Against corruption in situations where it is not easy to take a decision.

### Reference to training materials on Preventing Bribery is required.

### What is prohibited?

Giving anything of a value to a third party or receiving in return any kind of reward that will make the receiver gain advantage that would not otherwise have been freely granted.

While small, infrequent payments to expedite nondiscretionary action (known as "facilitating" or "grease" payments) are legal under some laws, they are prohibited by other laws and by the Group.

#### What is a "bribe"?

A bribe is any attempt to corruptly provide, or offer to provide anything of value to any person to influence the act or decision of that person for the purpose of obtaining or retaining business with, or directing business to, any person. Stating it more simply, a bribe is any attempt to gain a business or competitive advantage, or some other benefit that is not otherwise freely granted, by providing something of value to any person to influence their decision or action. Bribery of any kind will not be tolerated!

### What is "anything of value"?

Some examples of "anything of value" include, but are not limited to: Cash, Discounts, Free services, Favors, Promises forgiveness or assumption of debt.



### Anti-Money Laundering and Tax Evasion

Money laundering is concealing or converting illegal funds or property or making them look legal.

It includes possessing or dealing with the proceeds of crime. We must play no part in it.

Tax evasion means deliberately or dishonestly cheating the public revenue or fraudulently evading tax in any jurisdiction.

### We must be alert to situations which might raise our suspicions, including:

payments in non-invoice currencies or in cash or cash equivalents. Payments from multiple sources to satisfy a single invoice, or other unusual payment methods. Payments to or from an account that is not the normal business relationship. Account requests for overpayments or for refunds following an overpayment. Payments by, through or to (or requests to supply our products to) unrelated third parties or shell/shelf companies. Payments or shipments by, through or to companies or individuals established, resident or operating in countries which have the reputation of being 'tax havens' or to bank accounts held in such countries. Requests to deliver our products to an unusual location, adopt an unusual shipping route or importing and exporting the same products. False reporting such as misrepresenting prices, misdescribing goods or services we provide, misrepresenting payable tax or shipping and invoice document discrepancies. Failure by (customers and suppliers) to provide appropriate responses to any due diligence questions raised, including any tax registration details. Suspicion that trade partners are involved in criminal activity including tax evasion. We must not engage in any transaction which we know, or suspect involves the proceeds of crime (including tax evasion), or otherwise be knowingly involved directly or indirectly in money laundering activity.

We must also ensure that our activities do not inadvertently contravene money laundering and taxation laws. In most jurisdictions it is a crime for any person or company to engage in transactions involving assets which they know, suspect or have reason to suspect are derived from crime. Breaching anti-money laundering and taxation laws can result in both corporate liability and personal consequences for individuals.

**We must not** evade taxes or facilitate tax evasion by another person (including another Group entity) provide any assistance to someone who we know, or suspect is engaged in tax evasion

We must be aware of, and fully comply with, all taxation laws in jurisdictions where we operate account for and pay all taxes that are properly due. It is a crime for any company or individual to evade taxes. Money not properly paid in tax may constitute the proceeds of crime. There are sometimes legitimate ways for taxpayers to reduce their tax burden that do not constitute forms of tax evasion. However, it is important to distinguish between legitimate tax planning and tax evasion, which can be difficult at times. If you are in doubt about the difference between tax planning and tax evasion you should seek advice from the Accounting and Finance Department. We should promptly refer suspicious transaction or activity by any customer or other third party to our General Manager/CEO.



### Record Keeping | Sanctions

We are committed to ensuring that our business is conducted in compliance with all lawful sanctions regimes, and that we do not engage with any sanctioned parties. Our books, records, accounts and financial statements must be maintained in appropriate detail, must properly reflect the Group's transactions and must conform both to applicable law and to the Group's system of internal controls. Further, the group's public financial reports must contain full, fair, accurate, timely and understandable disclosure as required by law.

#### Accurate information and data

All data that we create, whether financial or non-financial, must accurately reflect the transactions and events covered. We must follow applicable laws, external accounting requirements and Group procedures for reporting financial and other business information. Failing to keep accurate records is contrary to Group policy and may also be illegal.

#### **Records management**

Group companies must adopt records management policies and procedures reflecting the Group. We must manage all of our critical business records in line with those policies and procedures and never alter or destroy company records unless permitted. We should be familiar with the records management policy and procedures that apply to us.

### Following accounting standards

Financial data (e.g. books, records and accounts) must conform both to generally accepted accounting principles and to the Group's accounting and reporting policies and procedures.

### **Co-operating with external auditors**

We must co-operate fully with the Group's external auditors and ensure that all information held by them which is relevant to the audit of any Group company is made available to that company's external auditors.

### Awareness of, and compliance with, sanctions

We must be aware of, and fully comply with, all lawful sanction regimes affecting our business. We must ensure that we never: supply our products, or allow our products to be supplied, to any person, purchase goods from any person, or otherwise deal with any person or property, in contravention of any applicable sanction. trade embargo, export control or other trade restriction. Sanctions may be imposed by individual countries or supra-national bodies, such as the UN and EU. Some sanctions regimes apply both to US persons (wherever located), to the use of US currency for payments and to exports/re-exports of US-origin products and products with US-origin content (whether or not the entity handling them is a US person). Breaching sanctions carries serious penalties, including fines, loss of export licenses and imprisonment.

### Sanctions include prohibitions or restrictions on:

Exports or re-exports to a sanctioned country Imports from, or dealings in property originating from, a sanctioned country

Travel to or from a sanctioned country Investments and other dealings in a sanctioned country, or with designated parties

making funds or resources available to designated parties transfer of restricted software, technical data or technology by email, download or visiting a sanctioned country supporting boycott activity











### In The Workplace

Premium Partners strives to respect and promote Human Rights in accordance with the 3 pillars under the UN guiding principles on businesses and human rights (Protect, Respect, and Remedy) and as per this policy for Human Rights.

As we are committed to respecting human rights as per the Guiding Principles, salient risks as a result of our own operations or that of our value chain are identified, managed, and tracked under this policy which is an integral part of Premium Partners Sustainability Management System that puts the company's operations and commitments on the right track to attaining the defined Global Goals that are relevant to our operations and impacts.

#### **Discrimination and Harassment**

We adapt diversity in our workplace where we foster equal opportunity away from discrimination and harassment. We are intolerant of discrimination on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, political opinion, or any other status protected by applicable law.

The basis for recruitment, hiring, training, compensation and advancement at Premium Partners is based on competencies that are defined and leveled per position and performance.

We make it clear that we are intolerant to disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind.

#### **Diversity & Inclusion**

Premium Partners recognizes that an inclusive and diverse workforce will help attract and retain the best people from the widest pool of available talent. Diversity improves the quality of decision-making and thus enhances our capacity to create value. Inclusion and diversity means valuing an individual regardless of their gender, marital or family status, sexual orientation, gender identity, age, disability status, ethnicity, religious beliefs, cultural

background, country of origin, socio-economic background, perspective and experience. We believe an inclusive and diverse business environment encourages a range of perspectives and fosters excellence in the creation of stakeholders' value.

We set specific targets for gender diversity at all levels of the organization and we are committed to report on our progress.

### Safeguarding employee well-being

We place a high value on the well-being of our employees and are committed to providing a safe working environment to prevent accidents and injury, and to minimize workplace health risks. Group must adopt health and safety policies and procedures and work together with their employees to ensure that health and safety is maintained and improved, and must strive to support employees' work/life balance

We will work continuously to maximize the physical security of our employees worldwide, ensuring that our policies and standards are understood, and that training is provided so everyone is aware of the health, safety and security issues and requirements relevant to their work.



# Throughout The Operations

We are committed to applying core principles of Human Rights and we expect our Partners to conduct their operations in the way which respects human rights.

### **Managing human rights risks**

We are committed to promoting human rights in our sphere of influence, including our supply chain. As such, all our suppliers are expected to meet the requirements of our Supplier Code of Conduct and this is incorporated into our contractual arrangements with suppliers. As far as possible, our due diligence procedures enable us to monitor the effectiveness of, and compliance with, our policy commitments, and our Supplier Code of Conduct, as well as to identify, prevent and mitigate human rights risks, impacts and abuse. We are committed to fully investigating and remediating any human rights issues identified in our operations or supply chain and to strive for continuous improvement. If we identify human rights breaches in relation to a supplier, but there is no clear commitment to corrective action, persistent inaction, or a lack of improvement, then our work with that supplier should cease.

#### No child labor

We are committed to ensure our operations are free from child labor. We recognize that the development of children, their communities and their countries is best served through education. We support ILO Conventions 138 and 182 which set out fundamental principles concerning the minimum age for admission to employment and for the elimination of the worst forms of child labor.

We expect our suppliers and business partners to align with our minimum age requirements, as set out in our Supplier Code of Conduct

### Freedom of Association and Collective Bargaining

We respect freedom of association and collective bargaining. Our workers have the right to be represented by trades unions, or other representatives. Such representatives should be able to carry out their activities within the framework of law, regulation, prevailing labor relations and practices, and agreed company procedures. We respect our employees' right to join unions or syndicates that they wish to without fear of intimidation or harassment. We understand that competitive pressures affect the workplace in myriad ways. In recent years, this has become especially acute for the issue of collective bargaining. In many countries, independent unions are not only rare, but illegal. This applies still more pressure on us and our business partners to restrict the ability of workers to voice their concerns and identify workplace violations. Regardless of the extent of their outsourcing or use of contractors, we expect our suppliers to ensure that their workers have access to effective means of collective bargaining. whether through a union, works council, or employee association.



### Throughout The Operations

### Forced Labor and Human Trafficking

We understand that the movement of goods often takes place along the same road, sea, and air networks as human trafficking rings. In countries around the world, particularly autocratic and failed states, local shipping companies may be linked to human trafficking in a number of ways, both visible and invisible. We expect our business partners in the transport and logistics field to ensure that they know the local trafficking context where they do business and engage with forced labor and migration NGOs to ensure that their operations do not contribute to these violations. We commit to prohibiting the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

### **Living Wages, Working Conditions and Hours**

We compensate employees competitively relative to the industry and local labor market. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws. We support the right of all our employees to have time to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay. We expect our suppliers and business partners to align with our minimum age requirements, as set out in our Supplier Code of Conduct

#### **Gender Equality**

Premium Partners recognizes that an inclusive and diverse workforce regardless of sex or race will help attract and retain the best people from the widest pool of available talent. Diversity improves the quality of decision-making and thus enhances our capacity to create value. Inclusion and diversity means valuing an individual regardless of their gender, marital or family status, sexual orientation, gender identity, age, disability status, ethnicity, religious beliefs, cultural background, country of origin, socio-economic background, perspective and experience. We believe an inclusive and diverse business environment encourages a range of perspectives and fosters excellence in the creation of stakeholders' value.

We set specific targets for gender diversity at all levels of the organization and we are committed to report on our progress.



### Reporting

We believe that fundamental human rights, as affirmed by the Universal Declaration of Human Rights, should be respected. We support the UN Guiding Principles on Business and Human Rights which outline the duties and responsibilities of industry to address business-related human rights issues through the creation of the 'Protect, Respect and Remedy' framework.

### **Reporting of Suspected Violations**

Employees should report suspected violations of applicable laws, regulations, contract requirements, or any aspect of this code. Such reporting should normally be made, initially, through standard management channels, beginning with the immediate supervisor.

### **Alternate Channels**

Alternatively, employees may report suspected violations or problems directly to the Accounting Manager, the HR Department, or the CEO directly on the contact info:

+32 2 897 04 70

### **External Channels**

Persons outside Premium Partners, who wish to report their concerns, may do so either by writing directly to the Office Manager, or by contacting the CEO directly. Or they can write their concern to <a href="mailto:privacy@premium-partners.com">privacy@premium-partners.com</a>

### Confidentiality and Protection of Whistleblowers

Such reports may be made confidentially, and even anonymously, although the more information given, the easier it is to investigate the report. Raising such concerns is the responsibility of Premium Partners personnel, and any information source will be treated in confidence. Persons reporting breaches or suspected violations of the code are entitled to be informed of the results of any subsequent investigations. Premium Partners will not, knowingly, take any action harmful to any employee or trustee for making a complaint in good faith pursuant to this policy

### **Individual Responsibility**

Ethics and integrity are the responsibility of each individual. Therefore, every staff of Premium Partners is responsible for ethical conduct consistent with this code. All personnel in supervisory positions must assume responsibility for ensuring that their conduct and the conduct of those they supervise comply with this code.



# ENVIRONMENTAL STEWARDSHIP



### Environment

### Where we live in!

We believe in the right of every citizen to live in a clean and green environment and it is the duty of each and every individual to sustain this environment.

We, as a group of individuals who are gathered with the aim to deliver business, we seek as well to have positive impact on our planet. We aim to reduce our environmental footprint through increase of efficiency in the use of natural resources and reduction of our waste through the 3 Rs Reduce, Reuse, and Recycle.

#### **The Policy**

It is the right of every citizen to live in a clean and green environment and it is the duty of each and every individual to sustain this environment for generations to come.

At Premium Partners, as a group of individuals who are gathered with the aim to deliver business, at the same time, we seek to have positive effect on the environment that surrounds us.

We aim to reduce our environmental footprint through increase of efficiency in the use of natural resources and reduction of our waste through the 3 Rs Reduce, Reuse, and Recycle guided by the Zero Waste hierarchy.

#### **Our Impact**

We all shall aim to minimize our energy consumption by paying special attention to electrical equipment and ensuring that no energy waste is in place. We are encouraged to use ecofriendly products and to lead ecofriendly life practices. Small actions can have high impact, like turning off lights that are not in use, keeping printing to the minimum and only when needed. And most importantly, getting rid of equipment in the most proper way. It is part of our suppliers' assessment criteria to select to partner with suppliers that manage their impact on the environment and to minimize their fingerprint.

We aim to cut down on our water usage and to reduce our carbon dioxide emissions throughout our supply chain, which will include the less use of shipments and depending more on local sourcing in each country where were are present.

### **Compliance**

We should all aim to comply with existing legal and regulatory requirements that would limit our operations' effect on the environment. All should work on establishing policy of keeping records of the different environmental aspects that are affected by our operations and way of managing and minimizing such effects.

We encourage practices that increase efficiency and reduce waste these practices are good for the environment and reduce costs. We all have to concentrate our resources on initiatives that have a maximum environmental benefit while contributing to the Group performance.

Whenever we are faced with challenging decision with its impact on the environment, we should keep in mind:

Efficiency – Waste - Compliance and The Waste Hierarchy

Reference to the Environmental policy is required.



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# SUSTAINABLE SUPPLY CHAIN Sustainable Procurement



# **Sustainable Supply Chain**

Moving towards more sustainable business requires us to work together with our suppliers to commit to more sustainable business practices.

We aim to develop strategies that involve all our stakeholders to be engaged each at their level. For this, we expect our team to show same commitment to be engaged with our transition towards more sustainable practices, each at her/his level.

KPIs are defined for our employees and our suppliers. These KPIs will be reviewed bi-annually to ensure performance and results are met and to be able to fill gaps when possible through proper guidance and training when needed

### **Our Commitment**

We are committed to:

- Setting Objectives and action plans in support of our sustainable procurement policy and pursuing continuous improvement of our practices
- Prioritizing suppliers who have embedded sustainable and ethical practices within their organization and who drive such practices within their own supply chain
- ✓ Identifying areas of higher risk and influence within our supply chain and engaging with suppliers in those areas
- ✓ Complying with the letter and spirit of all applicable legislation

We will favor suppliers that work actively on reducing their impact on the environment, delivering benefit to their society, and who work on practicing ethical behavior. Our suppliers are selected based on criteria gathered from questionnaires that will be the input on evaluation sheets for suppliers selection based on points and weight for each criteria.

### **Our Vision**

We aspire to be in the upper quartile of high performance procurement teams in our field.

### **Our Mission**

To be an innovative, progressive change agent and deliver effective transformation for maximizing the opportunity for delivering sustainable products.

Procurement will provide a high standard of professional expertise and actively apply principles of sustainable procurement

### **Value Proposition**

to support achieving strategic sourcing by delivering professional procurement solutions to our stakeholders that include legal entities, clients, employees, and local communities, through our core values that are fully embedded in all aspects of our service:

### Governance

Throughout our value proposition process, we are governed by local laws and international standards where conflict might arise.

Our teams work by internal rules and regulations set in place to make sure all members are working under same regulations. We have set an internal procedure that defines our process and work flow, where each role is defined and expectations are clarified.



# **Sustainable Supply Chain**

Corporate Social Responsibility, Fair Trade, Community Benefits, Living Wages, Supported businesses, Sustainability Code of Conduct, Antibribery & Corruption.

Measured and monitored using EcoVadis SAS model, Environment, Labour & Human Rights, Ethics and Sustainable Procurement considerations.

### **Compliance with EU Rules and Regulations**

We work with adherence to local laws be it for labor or legal compliance. We issue quarterly audit reports along with yearly reporting

### **Effectiveness & Efficiency**

Value for money (VFM), whole life costing and quality to meet the end user's requirement, cash savings to premium partners

#### **Our Role:**

- ✓ Develop, promote and implement appropriate procurement strategy and procedures.
- ✓ Offer local solutions out of fair trade and minimizing environmental impact which in turn will lower our footprint on the environment.
- ✓ Deliver maximum value for money (VFM) the optimum combination of whole life cost and quality to meet the client's requirement.
- ✓ Measure and monitor high risk Suppliers through EcoVadis sustainability rating.

- ✓ Measure and actively monitor that modern slavery and human trafficking is not taking place in any parts of our operation and/or in the whole supply chain.
- ✓ Compliance to Sustainable procurement duty.
- Embed relevant and proportionate sustainability requirements in the development of frameworks and contracts.
- ✓ Promote and engage in the implementation of relevant technology solutions, including e-procurement, to minimize costs.
- ✓ Embed Contract & Supplier Relationship Management with key strategic suppliers and mitigate supplier risk to client
- Measure and report procurement performance, including Best Practice Indicators (BPIs).
- ✓ Compliance to General Data Protection Regulation (GDPR).
- ✓ Compliance to Anti Bribery Laws and Corruption in EU.
- ✓ Promoting compliance with the European Framework Directive (1989/391/EEC) and any principles issued under it.



We are committed to ensure compliance with the points covered under our COBE.

We want to hear about any breach or comments.

To report any breach, you can do so by writing us back with utmost confidentiality in mind:

### **Premium Partners**

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