# Sustainable and Ethical Procurement Policy

| This policy will be reviewed annually or in response to changes in legislation | | |
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| Created | July 2023 | Chief Operating Officer |
| Reviewed | January 2026 | Chief Operating Officer |
| Approved | March 2026 | Group Leadership Team |
| Ratified | | |

## 1. SUSTAINABLE PROCUREMENT

1.1. Thomas's London Day Schools' (TLDS) acknowledges that procurement decisions carry environmental, social and economic implications and recognises its responsibility to procure goods and services in a responsible manner.

## *2.* SUSTAINABLE AND ETHICAL PROCUREMENT OBJECTIVES

2.1. Through this sustainable procurement policy we seek to:

- Incorporate sustainability considerations in our business decisions, procurement processes and supplier management;
- Ensure compliance with all applicable legislation as a minimum;
- Establish effective minimum standards for supplier sustainability compliance;
- Establish a clear understanding of sustainability management and performance within our supply chain;
- Promote adherence to the United Nations 10 principles of the Global Compact;
- Mitigate supply chain sustainability risks and exploit the opportunities;
- Maximise the positive environmental, social and economic impacts we can achieve through our procurement;
- Minimise the negative impacts across the entire life cycle of our operations and the goods and services we use;
- Manage procurement processes to ensure fair access to contracting opportunities for organisations of all appropriate sizes and types wherever relevant;
- Promote and support continual improvement in sustainability performance in our supply chain and in our sustainable procurement practices.
- Thomas's London Day Schools is committed to developing and carrying out procurement activities in a responsible manner and to entering into agreements and contracts with suppliers that share and adhere to its vision.
- Ethical procurement that supports LGBTQ+ rights and encourages all forms of diversity
- Develop policies to protect against sexual misconduct
- Pay fair (living) wages
- There is are also requirements of the board under governance
- Embraces diversity on board of directors
- Embraces corporate transparency

## *3.* KEY SUSTAINABILITY THEMES TO BE ADDRESSED

3.1. We aim to exceed the normal definition of Sustainable Procurement and carry out the procurement of goods and services throughout the whole life cycle and supply chain of the goods or services, in order to fulfil current needs without lessening the ability of future generations to do the same.

3.2. Within tenders undertaken by TLDS, sustainability impacts can cover (but are not limited to):

- **Corporate governance**: We will ensure that we operate appropriate procurement procedures and expect suppliers to have robust corporate governance procedures in place.
- **Human rights**: We will undertake appropriate due diligence on supply chain human rights, especially with suppliers in high risk industries, and take all actions available to avoid complicity with human rights failures. TLDS expects that all suppliers adhere to the UN Convention of Human Rights, to not use forced,

involuntary and underage labour within their own operations, and have robust processes in place to ensure this applies across their supply chains.

- **Labour practices**: We expect suppliers to enact good labour practices, including fair and equitable employment relationships, good conditions of work and social protection, social dialogue, health and safety at work, human development and training for staff.
- **Environmental impacts, risks and opportunities**: We expect all suppliers to manage environmental impacts, risks and opportunities effectively, including to prevent pollution, take action to reduce their impact on the environment, manage climate related risks and opportunities, take action to reduce waste and use resources sustainably, and to protect the environment, biodiversity and natural habitats
- **Fair operating practices**: We expect suppliers to operate fairly. They must have robust practices in place to prevent corruption, to ensure fair competition and responsible political involvement, promote sustainability within their supply chain and respect property rights.
- **Consumer issues**: We expect suppliers to treat customers fairly and with honesty. This means fair marketing, providing factual and unbiased information, using fair contractual practices, and protecting consumers' health and safety. Suppliers should take action to support sustainable consumption, and provide appropriate service, support and complaint resolution, and manage personal and sensitive information effectively.
- **Community involvement and development**: We aim to have a positive impact on our community through our procurement where we can, and expect our suppliers to do the same. This includes community involvement, supporting education and culture, creating local employment and skills development, and supporting technology development and access.
- **Developing Local suppliers**: TLDS is committed to encouraging local businesses to compete for contract opportunities to support the development of the local economy. TLDS actively encourage the use of locally based suppliers where they can offer best value for money.

## *4.* GUIDING PRINCIPLES FOR RESPONSIBLE PROCUREMENT

4.1. TLDS will ensure that all procurement is undertaken in line with 11 guiding principles:

4.1.1. **Accountability**: TLDS is accountable for our environmental, social and economic impacts and we aim to maximise positive impacts and minimise negative impacts through our procurement decisions and processes

4.1.2. **Transparency**: We will ensure that our procurement processes and decisions are transparent, and we expect our suppliers and prospective suppliers to be transparent.

4.1.3. **Ethical behaviour:** TLDS holds itself to high standards of ethics and expects our suppliers to do the same.

4.1.4. **Full and fair opportunity:** We will take all possible action to avoid bias and prejudice in procurement decision making, and ensure that small and medium-sized organisations have a full and fair opportunity to complete.

4.1.5. **Respect of stakeholder interests:** We will take the interests of our stakeholders in account when we make procurement decisions.

4.1.6. **Respect for law and international norms**: It is expected that TLDS and our suppliers adhere to all applicable legislation and international standards, and that our suppliers impose similar requirements across their supply chains.

4.1.7. **Respect for human rights**: TLDS expects that all suppliers adhere to the UN Convention of Human Rights, to not use forced, involuntary and underage labour

within their own operations, and have robust processes in place to ensure this applies across their supply chains.

4.1.8. **Focus on needs:** We will ensure that we only procure goods and services that are needed and seek more sustainable alternatives wherever possible.

4.1.9. **Integrate sustainability considerations within procurement and business decisions:** We will ensure that sustainability is considered within our procurement and business decision making processes.

4.1.10. **Analyse whole-life costs:** We will take the whole-life environmental, social and economic costs into consideration when making procurement decisions.

4.1.11. **Continuous improvement:** We will strive to make continuous improvement on sustainable procurement and establish processes to ensure that our suppliers do the same.

## *5.* INCORPORATING SUSTAINABILITY PRINCIPLES INTO PROCUREMENT PROCESS

5.1. We will:

- Consider the environmental, economic and social impacts of the goods and services we procure
- Set improvement targets where appropriate
- Evaluate the sustainability management and performance of suppliers and contractors at contract commencement and throughout the duration of the contract
- Establish a process to address any non-conformance with this policy and ensure continuous improvement
- Ensure staff are aware of this policy and their role in sustainable procurement

*Our procurement process*

5.2. Defining the need

- We aim to reduce our material consumption and the associated impacts. To do so, will assess the need for the product or service to be purchased, and avoid unnecessary or duplicated purchasing.
- We will ensure that staff are aware of this policy and provide training for staff with procurement responsibilities on their role in meeting its objectives. We will encourage staff to review the consumption of goods with a view to procuring less, and less often.

5.3. Evaluating the options

- We will carefully consider the options available to us to meet our requirements, taking into account relevant environmental, social and economic considerations. This may mean completing a business case appropriate to the size, scale and impact associated with the purchase.

5.4. Designing and specifying the solutions

- We will design our requirements and specifications to reduce any negative environmental, social or economic impact or risk and maximise possible value creation opportunities. This might include:
    - Avoid material use where possible, such as minimal or reusable packaging
    - Favour products with recycled content that can be recycled or are biodegradable.
    - Consider the whole life cost, energy usage and carbon emissions of goods and services, and promote the procurement of products that have minimal environmental impact during their life (e.g. durable, energy efficient, reusable, refillable)
    - Consider how products are to be disposed of at the end of life

- Examine how the purchase will create new jobs and skills
- Explore how the solution could negatively affect or create extra value for our wider stakeholders, e.g. neighbouring institutions.

*Supplier selection*

5.5. Suppliers should demonstrate good management of environmental, social and business ethics issues and have appropriate policies and management systems in place where appropriate. This must cover their supply chain and any subcontractors.

5.6. We will seek to appoint suppliers who have good environmental, social and financial controls in place. We will aim to work with supply chain partners who have a sustainability strategy with clear objectives to improve performance, and who will support TLDS to improve our sustainability performance.

*Tender evaluation*

5.7. As well as considering quality and price, preference will be given to suppliers who have reduced the environmental impact of their goods and services, and who can demonstrate strong investment in people and the community. This includes:

- Minimising the use, size and weight of packaging, and encourage re-usable and recyclable packaging materials
- Minimising impacts from ongoing transport and consumables
- Investing in training, skills and professional development of staff
- Strong practices on health and safety and wellbeing
- Good practices on diversity and inclusion
- Demonstrating how new jobs or new opportunities for members of the community can be created (e.g. providing work experience or mentoring for young people starting their careers or helping long-term unemployed people get back into work)

*Post-contract management*

5.8. We expect suppliers to adhere to our Supplier Code of Conduct and maintain good standards of environmental, social and economic practices.

5.9. We may set improvement targets related to the environmental, social and economic performance of our supply chain. We expect suppliers to take action to support these objectives and report on performance metrics where required.

5.10. We aim to partner with suppliers to deliver continual improvement in our environmental, social and economic performance. We expect suppliers to collaborate with us, recommending improvements to processes and new technologies where appropriate, and responding to insights and feedback from TLDS

5.11. We will monitor the environmental, social and economic practices and performance of our suppliers. This may include audits and desk-based reviews. We expect suppliers to provide us with relevant environmental, social and economic data if requested.

5.12. We will facilitate training, capacity development and sharing of best practice across our supply chain to support improvements in environmental, social and economic management and impact across our supply chain.

*5.13. Non-conformance and corrective action*

5.14. If instances of non-conformance with our Code of Conduct or contractual requirements are identified, we will agree to corrective actions with the supplier.

5.15. We will monitor the corrective actions to ensure they are carried out to our satisfaction and provide support where needed to help suppliers to correct any issues.

5.16. We will cease trading with suppliers who show persistent disregard for important elements of environmental, social and ethical standards or regulatory requirements.