



gatehousebank

Sustainable Procurement Policy

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1 Introduction

Gatehouse Bank is committed to improving our impact on people and planet. A sustainable procurement policy helps us to understand and manage the environmental, social and governance (ESG) impacts of our operations through our supply chain.

2 Purpose of Policy / Policy Statement

The purpose of the Sustainable Procurement policy is to embed the consideration of environmental, social and governance factors into the procurement process. The objective of the policy is to improve the ESG impact on our operations and that of our supply chain by working with suppliers whose ESG values are the same as ours and who can demonstrate the same through their actions.

3 Applicability of Policy

This policy applies to all departments at the Bank.

4 Policy Control Objectives

The policy commits the Bank to supporting suppliers that manage their ESG impacts, through our supplier selection process and ongoing engagement with current and new suppliers.

5 Strategies and requirements to achieve Objectives.

When onboarding new suppliers or renewing contracts with suppliers, all colleagues need to consider the environmental, social and governance performance of suppliers as part of their decision-making process when comparing potential suppliers. Suppliers with positive ESG can demonstrate they: -

- Manage their environmental impact (e.g. conservation of resources and reduction of waste; measuring and having targets to reduce their Greenhouse Gas emissions; or by making an active positive environmental impact).
- Manage their impact on society (e.g. complying with the Human Rights Act, International Labour Organisation conventions and ensuring slavery is not taking place in their supply chain and treating their staff well and providing them with opportunities to learn and grow).
- Manage their governance (e.g. supporting social enterprises or creating opportunities for local or small enterprises, providing a living wage, and working against corruption and bribery).

Existing and new suppliers are required to complete an onboarding form incorporating ESG questions appended to the Anti-Bribery and Corruption Policy and Sustainable Procurement Policy.

6 Record Keeping

The supplier onboarding form is to be saved and stored by the relevant departments and in Risksmart.

7 Policy Governance

All colleagues shall comply with this Policy. Any breach of this Policy shall be treated as an incident and may be dealt with in accordance with the Bank's Disciplinary Policy and Procedures. Responsibilities are further described below:

Role	Responsibilities
Chief Risk Officer	Consider the policy objectives when assessing the Risk Management Framework
Internal Audit	Assess compliance with policy when conducting reviews/audits of operational units
Operational Units	Take suppliers' ESG footprint into account when making procurement decisions
ESG Lead	Conduct annual audits to capture ESG data provided by suppliers
Individuals	Individuals to apply the sustainable procurement policy for new supplier onboarding and collecting information from existing suppliers.

8 Definitions

ESG Policy - Environment Social Governance Policy

9 Appendix

Below are listed the related documents to this policy:

- Anti Bribery & Corruption Policy
- Financial Crime Policy
- Modern Day Slavery Statement
- ESG Policy