

Ethical Sourcing Policy and Statement of Intent

FP McCann Ltd commits to

- Understanding our supply chains, including health and safety, environmental, labour and human rights issues
- Expecting responsible behaviour, as well as quality and value
- Working with suppliers to make improvements, where their practices fall short of our expectations
- Withdrawing from contracts where improvement is impossible
- Respecting suppliers' confidential information and running fair selection processes
- Making payments in accordance with our contractual commitments

Under the ethical, social and environmental criteria, suppliers are assessed, among other things, on:

- Compliance with relevant legislation and regulations
- Use of energy and other natural resources
- Respect for confidentiality
- Whether they have a civic and responsible attitude
- Whether they have principles for action defining their commitments and priorities
- Whether they have an environment policy
- Whether they have a whistleblower policy

These assessments are reviewed jointly with our suppliers and lead to an improvement plan being drawn up if necessary.

FP McCann Ltd's policy is to seek to purchase goods and services which:

- Are produced and delivered under conditions that do not involve the abuse or exploitation of any persons;
- Have the least negative impact on the environment.

Ethical sourcing principles

FP McCann recognises and supports the United Nations Guiding Principles on Business and Human Rights (UNGPs) – the most authoritative and widely adopted set of principles for responsible business, endorsed in 2011. The guidelines state that: "Business enterprises should respect human rights. This means that they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.

FP McCann Ltd's policy addresses ethical issues: the key focus is to uphold internationally recognised fundamental human rights, to protect workers and to act within the law. We recognise the five fundamental rights as agreed by the international Labour Organisation, namely;

- Freedom of association and the effective recognition of the right to collective bargaining;

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- The elimination of all forms of forced or compulsory labour;
- The effective abolition of child labour,
- The elimination of discrimination in respect of employment and occupation;
- and a safe and healthy working environment;

We expect our suppliers to adhere to these standards:

- Allow workers to form and join trade unions of their own choosing, and not to victimise workers or their representatives who choose to exercise that right
- Take part in collective bargaining in good faith with recognised trade unions
- Where workers have chosen not to exercise their right to join a trade union, the supplier will follow appropriate national law on workplace consultation forums and respect worker representation on those structures
- Afford their employees the freedom to choose to work for them
- Employees should be free to leave the supplier after reasonable notice is served
- Suppliers should not use forced, bonded or prison labour that does not meet ILO principles;
- Establish recognised employment relationships with their employees that are in accordance with their national law and good practice. This would normally mean having a written contract of employment. Suppliers should not seek to avoid providing employees with their legal or contractual rights through the use of labour only sub-contracting, temporary contracts, apprenticeships, zero hours contracts.
- Can demonstrate a commitment to equality of opportunity for individuals and groups enabling them to live their lives free from discrimination and oppression.
- Follow working hours for their staff which are compliant with national laws or industry standards, or ILO Convention No 1.
- Under no circumstances abuse or intimidate, in any fashion, employees.
- Follow a zero-tolerance policy towards Gender Based Violence, in accordance with the ILO Violence and Harassment Convention, 2019 (No. 190);
- Appropriate disciplinary, grievance and appeal procedures should be in place, workers should have the right to be represented by their trade union, or a fellow worker, chosen by them, to represent them in using such procedures;
- Work within the laws of their country
- Take appropriate measures to ensure the health and safety of their workforce and the wider public;
- Support our view that the long-term elimination of child labour is ultimately in the best interests of children, and have taken measures to ensure that child labour is not utilised in their operations;
- Do not support, encourage or facilitate the trade in drugs, arms, tobacco, slavery or prostitution; and
- Offer wages and benefits that at least meet relevant industry benchmarks or national legal standards.
- We will encourage ethical sourcing practices among our suppliers, partner organisations and the broader market.
- Monitoring suppliers will normally be done through a desk-based assessment by our internal procurement team. Where there is thought to be a higher level of risk, or where the desk-based assessment indicates that there could be issues of concern we will consider a more detailed review or commissioning a comprehensive Human Rights Due Diligence report. We do not believe that traditional third-party audits are an effective tool for identifying serious systematic breaches of human rights.

Signed: _____

Hugh McCann
Managing Director

Reviewed:

Last Reviewed:
 Next Review:

12 January 2026

11 January 2025

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