ECM (Vehicle Delivery Service) Ltd - Supplier Sustainability Policy

Section 1 Introduction and Policy Statement

ECM (Vehicle Delivery Service) Ltd is one of Europe's leading providers of Finished Vehicle Logistics. Operating over 450 bespoke car transporters, ECM delivers c.1.0 million vehicles per annum in the UK, on behalf of car manufacturers, importers, national sales organisations, and retailers.

ECM is committed to minimising the adverse social impacts of its day-to-day operations, including the purchasing of goods and services.

Ensuring sustainability is embedded in our decision making is essential to our goal of making a sustainable contribution to our stakeholders, namely customers, employees, industry, and wider society.

Supplier Sustainability – Aims, Objectives and Methods

QCDME	Purchase goods and services in a fair and transparent manner, using a balanced sourcing approach that takes into consideration the QCDME principle: **Q**uality - of the goods and services **C**ost - when compared with other Suppliers of similar goods and services **D**elivery - of the goods and services in a timely, damage free, competent manner **M**anagement - of the ECM account, before, during and after the purchase **E**nvironment – minimising as much as economically possible, any impact on the physical and social environment
Equal Opportunities	to all bidders, both new and existing Suppliers, without discrimination in respect of race, religion, sexuality, age, location, religious beliefs.
Conflict of Interest	Ensure all purchasing decisions are free from conflicts of interest. Any ECM Officer undertaking a purchasing process should declare to the Board of Directors any Conflict of interest, relationship, or connection that may exist between them and the Supplier / potential Supplier.
Visits / Audits	An ECM representative may visit existing Suppliers, at their premises, to Audit compliance with this Policy. All new Suppliers may be visited by an ECM representative prior to order placement in order to audit compliance with this policy.

Policy Compliance

All Suppliers should conduct their business activities with ECM in a manner that is consistent with, and achieves the objectives of the following ECM Policies:

ECM Anti-Corruption and Anti-Bribery Policy

ECM Code of Business Conduct

ECM Competition Law Compliance Policy

ECM Environmental Management Policy

ECM Health and Safety Policy

ECM Modern Slavery Statement

It is a requirement that all suppliers agree to comply with this Supplier Sustainability Policy and conduct their own business activities in a similar manner.

Any supplier to ECM must also ensure that their own suppliers also comply with these requirements, and in turn pass on similar requirements down the supply chain.

Section 2 Zero Tolerance

ECM operates a zero-tolerance policy in respect of its Suppliers' compliance with the following.

Child Labour

Child labour is forbidden. The minimum age for permission to work, according to national laws and legislation, must be observed.

Modern Slavery and Human Trafficking

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to Modern Slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective processes to ensure Modern Slavery is not taking place anywhere in our own business or in any of our supply chains.

Bonded, Compulsory, Forced, Trafficked labour and any form of Modern Slavery is strictly forbidden. Employees must be free to leave their employment after reasonable notice. Employees must not be required to lodge deposits of money or identity papers with their employer. Employees must not, under any circumstance, be held in slavery or servitude, whether adults or children.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

As part of our purchasing processes, this policy is publicly available on our website and is sent to all new suppliers. All new suppliers must confirm that they comply with the specific prohibitions of this policy. We reserve the right to seek the same confirmation from existing suppliers, at any time.

We expect that our suppliers will hold their own suppliers to the same high standards.

Elimination of Discrimination in Respect of Employment and Occupation

Discrimination based on factors non-relevant to the terms of employment is strictly forbidden. Examples of non-relevant attributes include disability, ethnicity, gender, race, religion, sexual orientation.

Working Hours

Working hours and record keeping, must comply with the respective national and EU legal standards, limits, and requirements.

Compensation, remuneration, and payment to employees

The compensation and benefits paid or received, must comply with the respective national legal standards, limits, and requirements.

Bribery and Corruption

No form of bribery or corruption will be tolerated. Suppliers must operate their business in a manner consistent with the ECM Anti-Corruption and Anti-Bribery Policy.

Health and Safety

Suppliers must, at the very least, comply with the minimum national standards in respect of a safe and hygienic working environment. Suppliers must take appropriate measures to guarantee Health and Safety at the workplace in accordance with national laws, legislation, and regulations. Appropriate Health and Safety training and information should be provided to employees.

Counterfeit Parts, Export Controls and Economic Sanctions

The use of genuine/authorised parts is a key way of ensuring that safety in operation and performance can be maintained. As such, suppliers must only sell parts that are genuine and provided by/with authorisation from the original manufacturer. Any copies or counterfeit production of parts will not be tolerated. No suppliers operating in countries under export controls/economic sanctions will be dealt with, and all suppliers are reminded to ensure their own supply chain also adheres to this policy.

Whistleblowing

ECM is committed to building strong relationships with suppliers, encouraging high standards and effective communication when needed. This extends to the reporting of any unethical behaviour or breaches of any of ECM's codes of conduct/policies/the law, without limitation. ECM will ensure all disclosures regarding the conduct of an accused party/supplier will be dealt with confidentially and with the utmost discretion – anonymity will be retained unless obliged to disclose the identity of any individual involved (i.e. under legal proceedings). Any identified breaches of ECM's codes of conduct/policies/the law by any supplier will result in the immediate cessation of any business relationship.

Section 3 Implementation

All ECM Directors, Managers, Supervisors, and Employees have shared responsibility for implementing the provisions of this policy.

The Board of Directors will endeavour to review this policy on an annual basis.

Approved by the Board of Directors

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