

1 Introduction

Bluesource Information Limited (“Bluesource” or “the Company”) is committed to procuring goods and services in a responsible, ethical and sustainable manner. Sustainable procurement supports the Company’s wider Corporate Social Responsibility, Environmental, ESG, supplier governance and information security commitments by ensuring that environmental, social, ethical and governance considerations are included in purchasing and supplier management decisions alongside conventional procurement factors such as price, quality, technical suitability, security, reliability and service performance.

As an IT consultancy and managed services provider, Bluesource recognises that a significant proportion of its environmental and social impact may arise indirectly through its upstream supply chain, including technology vendors, software providers, cloud and SaaS providers, professional service providers, office suppliers, waste handlers, facilities providers and subcontractors. While operational or technical requirements may mean that certain suppliers, vendors or platforms must be used to meet customer, contractual, security or service needs, Bluesource will consider sustainability criteria wherever reasonably practicable and proportionate.

This policy supports and should be read alongside the Company’s Environmental Policy, Sustainability Policy, Supplier Code of Conduct, Company Code of Conduct, Information Security Management System, Data Protection and Information Security Requirements for Suppliers, Anti-Bribery and Corruption controls, Equality, Diversity and Inclusion commitments, Health and Safety arrangements and ESG reporting processes.

2 Purpose

The purpose of this policy is to define Bluesource’s approach to sustainable procurement and supplier due diligence. It is intended to ensure that the Company:

- integrates environmental, social, ethical and governance considerations into procurement and supplier management decisions;
- supports suppliers that demonstrate responsible business conduct, environmental stewardship, respect for human rights, fair labour practices, information security, data protection and anti-corruption controls;
- reduces sustainability risks within the supply chain, including environmental harm, unethical labour practices, corruption, poor governance, security weakness and inappropriate handling of confidential or customer information;
- supports continuous improvement in supply chain ESG performance through supplier assessment, monitoring, engagement and reporting;
- contributes to the Company’s environmental objectives, including reducing emissions, minimising waste, supporting renewable energy, encouraging digital-first working and promoting responsible resource use;
- supports the Company’s UN Global Compact-aligned commitments and relevant United Nations Sustainable Development Goals.

3 Training, Awareness and Implementation

Employees and managers with purchasing, supplier-management, supplier-approval or supplier-review responsibilities will be made aware of this policy and provided with appropriate guidance or training proportionate to their role. Where relevant, sustainable procurement requirements should be reflected in supplier onboarding, procurement approval processes, supplier review activity and supporting governance records.

4 Scope

This policy applies to all employees, managers and business functions involved in purchasing, supplier selection, supplier onboarding, contract renewal, supplier review, subcontractor engagement or supplier performance management on behalf of Bluesource.

It applies to the procurement of goods and services including, but not limited to:

- ☒ software, licensing, SaaS, cloud and hosted services;
- ☒ IT hardware, peripherals and infrastructure;
- ☒ subcontracted technical services and professional services;
- ☒ office supplies, furniture, stationery and consumables;
- ☒ energy, utilities and facilities-related services;
- ☒ waste management, recycling and secure disposal services;
- ☒ marketing, events, travel and hospitality services;
- ☒ any supplier, subcontractor or third-party provider that processes Bluesource or customer information, supports service delivery or contributes materially to the Company's operational footprint.

The level of assessment and due diligence applied will be proportionate to the supplier's role, risk profile, value, criticality, access to information, environmental impact and relevance to Bluesource's customer, contractual and regulatory obligations.

5 Definitions

The following definitions apply for the purposes of this policy and are intended to support consistent interpretation of Bluesource's sustainable procurement, supplier due diligence, ESG monitoring and supplier governance requirements.

Term	Definition
Sustainable procurement	Obtaining goods and services in a way that achieves value for money on a whole-life basis while considering environmental, social, ethical, economic, security and governance impacts throughout the supply chain.
ESG	Environmental, Social and Governance factors used to assess responsible business conduct, sustainability maturity, ethical behaviour and supply chain risk.
Supplier owner / business owner	The Bluesource employee, manager or function responsible for the business relationship, service need, supplier performance or approval associated with a supplier.
Critical or higher-risk supplier	A supplier whose goods, services, access, location, sector, spend, information-processing activity or operational dependence creates elevated legal, contractual, information security, environmental, social, continuity or reputational risk.

Supplier governance records	Records used to document supplier assessment, approval, monitoring, ESG screening, assurance evidence, risks, exceptions, corrective actions and reviews, including the Supplier Register, supplier tracking log and rolling monthly ethics reporting log.
Scope 3 emissions	Indirect greenhouse gas emissions arising from activities outside Bluesource's direct operations, including emissions associated with purchased goods, services, suppliers, travel, waste and other value-chain activities.
Corrective action	An agreed action, control, improvement, evidence request or remediation step intended to address supplier non-compliance, weakness, risk, missing evidence or underperformance.

6 Policy Statement

Bluesource will procure goods and services in a way that supports responsible business conduct and sustainable development. Procurement decisions should, wherever reasonably practicable, consider:

- environmental impact, including energy use, greenhouse gas emissions, waste, recycling, packaging, transport, product lifecycle and end-of-life disposal;
- supplier ESG maturity, including the existence of environmental, sustainability, carbon reduction, human rights, equality, health and safety, ethics and governance policies;
- supplier commitments to carbon reduction, renewable energy, net zero, responsible resource use and pollution prevention;
- respect for human rights, prevention of forced labour, child labour and human trafficking, and support for fair and safe working conditions;
- equality, diversity, inclusion and non-discrimination within the supplier's operations and supply chain;
- business ethics, anti-bribery, anti-corruption, fraud prevention, conflicts of interest and transparent business dealings;
- information security, data protection, business continuity and resilience, particularly where suppliers handle company, customer or confidential information;
- ability to provide sustainability information, metrics or assurance evidence where requested;
- alignment with Bluesource's Supplier Code of Conduct and contractual requirements.

Bluesource will not award business solely on the basis of sustainability credentials where technical, security, contractual, operational or customer requirements require a specific supplier or solution. However, sustainability considerations must remain part of the decision-making process wherever practicable, and any material limitations should be understood and documented where appropriate.

Where a material sustainability requirement cannot be met, the reason, associated risk, compensating controls or improvement action, and appropriate approval should be documented proportionately within the relevant supplier governance record.

7 Sustainable Procurement Principles

Bluesource's sustainable procurement approach is based on the following principles:

- **Proportionality:** supplier due diligence and sustainability assessment will be proportionate to supplier risk, spend, criticality and relevance.
- **Transparency:** procurement decisions should be made openly, fairly and with appropriate records retained where required.
- **Ethical conduct:** suppliers must act lawfully, professionally, ethically and with integrity.

- 🔵 **Environmental responsibility:** suppliers should seek to reduce environmental impacts, including emissions, energy consumption, resource use, waste and pollution.
- 🔵 **Human rights and labour standards:** suppliers should respect internationally recognised human rights and maintain fair, safe and non-discriminatory employment practices.
- 🔵 **Security and resilience:** suppliers must protect Bluesource and customer information and maintain appropriate continuity arrangements where relevant to service delivery.
- 🔵 **Continuous improvement:** Bluesource will use supplier engagement, reporting and review processes to improve the maturity of sustainable procurement over time.
- 🔵 **Lifecycle thinking:** purchasing decisions should consider the environmental and social impacts of products and services across their lifecycle, including production, use, repair, reuse, recycling and disposal.
- 🔵 **Whole-life value:** procurement decisions should consider total cost of ownership, including purchase price, implementation, energy and resource use, maintenance, durability, support, renewal, exit, reuse, recycling and disposal costs.
- 🔵 **Inclusive and proportionate procurement:** due-diligence and evidence requirements should not create unnecessary barriers for smaller suppliers where equivalent assurance can reasonably be demonstrated.

8 Supplier Selection and Due Diligence

When selecting or reviewing suppliers, Bluesource will consider sustainability and ESG-related factors alongside price, quality, security, service capability, contractual terms, technical suitability and reliability.

Sustainability and ESG considerations should be applied, where relevant and proportionate, during requirements definition, supplier evaluation, approval, contracting, onboarding, periodic review, renewal and exit or replacement.

Supplier due diligence will be applied using a proportionate, risk-based approach. The level of assessment will consider supplier criticality, annual spend, access to Bluesource or customer information, use of subcontractors or subprocessors, country or sector risk, environmental impact, business continuity relevance and any customer, contractual, legal or regulatory requirements.

Where proportionate, supplier assessment may include consideration of whether the supplier has:

- 🔵 an Environmental Policy, Sustainability Policy, ESG Policy or Corporate Social Responsibility Policy;
- 🔵 a Carbon Reduction Plan, carbon net zero target or greenhouse gas emissions reporting;
- 🔵 evidence of renewable electricity use, energy efficiency initiatives or emissions reduction programmes;
- 🔵 policies or controls addressing human rights, modern slavery, forced labour, child labour and fair working conditions;
- 🔵 Equality, Diversity and Inclusion, anti-discrimination or equal opportunities commitments;
- 🔵 Health and Safety policies and safe working practices;
- 🔵 anti-bribery, anti-corruption, fraud prevention, whistleblowing or business ethics controls;
- 🔵 information security certifications, data protection controls, business continuity arrangements or security assurance evidence where relevant;
- 🔵 supplier codes, subcontractor controls or supply chain due diligence arrangements;
- 🔵 membership of, or assessment through, recognised sustainability or responsible sourcing platforms where relevant, including EcoVadis, SEDEX or equivalent schemes.

Supplier assessment outcomes should be recorded where relevant in the Company's [Supplier Register](#) (supplier tracking log) or other appropriate supplier governance records.

Where sustainability information materially influences a procurement or supplier-management decision, Bluesource may seek reasonable supporting evidence and should avoid relying solely on unsupported environmental, social or ethical claims.

Evidence may include published reports, recognised certifications, targets, performance data, independent assessments, audit findings or documented improvement plans.

Where a supplier, service, system or solution involves the introduction, use, change or outsourcing of an information processing facility, Bluesource's [New Information Processing Facility Policy](#) and procedures must be followed where appropriate. This may include completing an appropriate information security risk assessment, confirming ownership and approved use, assessing supplier and technical controls, documenting any required mitigations, and ensuring controls are implemented before the supplier or facility is approved for use.

9 Supplier Code of Conduct and Contractual Expectations

Bluesource expects suppliers to operate in a manner consistent with its Supplier Code of Conduct and applicable contractual requirements. Suppliers must comply with legal, regulatory, contractual, security, ethical and sustainability obligations relevant to the goods or services they provide.

Where appropriate, suppliers may be required to:

- ➊ confirm acceptance of the Supplier Code of Conduct or equivalent contractual sustainability obligations;
- ➋ maintain appropriate policies, procedures and controls;
- ➌ provide ESG, environmental, labour, ethics, information security or business continuity evidence upon reasonable request;
- ➍ notify Bluesource of actual or suspected non-compliance;
- ➎ cooperate with reasonable assurance activities, investigations, reviews, audits or corrective action processes;
- ➏ ensure equivalent standards are applied throughout their own supply chains where relevant.

Failure to meet required standards may result in supplier engagement, corrective action, enhanced monitoring, suspension of new work, non-renewal or termination of the supplier relationship, depending on the nature and seriousness of the issue.

10 Environmental Procurement Requirements

In line with the Company's Environmental Policy and UN Global Compact environmental principles, Bluesource will seek to reduce environmental impacts associated with purchased goods and services. Where practicable, employees involved in procurement should:

- ➊ prioritise digital-first ways of working and reduce unnecessary printing, paper use and physical storage;
- ➋ select recycled, recyclable, reusable, biodegradable, compostable, FSC-certified, PEFC-certified, fair-trade or eco-certified products where available and suitable;
- ➌ choose energy-efficient equipment, including recognised energy-rated devices where appropriate;
- ➍ consider renewable, low-carbon or lower-impact energy and utility options at renewal or procurement points;
- ➎ consider the use of cloud and SaaS solutions where they reduce unnecessary hardware, resource duplication, energy use or travel;
- ➏ reduce unnecessary business travel by using remote collaboration tools and shared working resources;
- ➐ consider product durability, repairability, reuse, recycling and end-of-life disposal options before purchase;
- ➑ use responsible recycling, confidential waste, WEEE and waste handling providers;
- ➒ avoid products linked to illegal logging, avoidable deforestation, harmful pollution or poor waste practices where alternatives are available;

- consider suppliers' environmental policies, carbon reduction plans and emissions maturity, particularly where suppliers contribute to Bluesource's Scope 3 emissions.
- consider material impacts on water use, biodiversity, ecosystems and natural resources where relevant to the goods, services or supplier sector;
- consider the accessibility and inclusive design of procured technology, digital services and workplace solutions where relevant.

11 Social, Human Rights and Labour Requirements

Bluesource expects suppliers to respect human rights and maintain fair labour practices. Suppliers should not use, support or benefit from forced labour, child labour, human trafficking, unsafe working conditions, unlawful discrimination, harassment or exploitative employment practices.

Where proportionate, procurement and supplier review activity should consider whether suppliers:

- provide safe and healthy working conditions;
- comply with applicable employment, labour and health and safety laws;
- support equality of opportunity and non-discrimination;
- respect freedom of association and lawful worker representation where applicable;
- maintain appropriate grievance, whistleblowing or reporting mechanisms;
- address modern slavery and human trafficking risks within their operations and supply chain;
- apply equivalent expectations to subcontractors and suppliers involved in delivering goods or services to Bluesource.

12 Ethics, Anti-Corruption and Conflicts of Interest

Bluesource will conduct procurement activity ethically, transparently and with integrity. Employees involved in procurement must avoid bribery, corruption, fraud, extortion, improper inducements, unfair influence and unmanaged conflicts of interest.

Employees must:

- make procurement decisions based on legitimate business requirements and documented considerations where appropriate;
- avoid accepting gifts, hospitality or benefits that could influence, or appear to influence, supplier selection or management;
- declare actual, potential or perceived conflicts of interest;
- follow applicable approval, purchasing, finance and governance processes;
- report suspected unethical conduct, fraud, bribery, corruption or supplier misconduct through appropriate internal channels, including the Company's Whistleblowing Policy (as detailed within the [Employee Handbook](#)).

Suppliers are expected to maintain equivalent standards and to notify Bluesource of any actual or suspected unethical conduct connected with goods or services supplied to the Company.

13 Information Security, Data Protection and Business Continuity

As a technology and managed services provider, Bluesource recognises that supplier governance must include information security, privacy and resilience considerations. Sustainability and responsible procurement therefore include the protection of confidential information, customer data, systems, service continuity and operational resilience.

Where suppliers process, access, store or support Bluesource or customer information, they may be required to demonstrate appropriate:

- ☒ information security controls;
- ☒ data protection and privacy controls;
- ☒ contractual data processing arrangements;
- ☒ incident reporting and breach notification processes;
- ☒ business continuity and disaster recovery arrangements;
- ☒ subcontractor or subprocessor controls;
- ☒ compliance with Bluesource's supplier security and data protection requirements;
- ☒ alignment with the Company's ISO/IEC 27001 aligned governance framework where relevant.

For further information please also refer to the Company's [Supplier Information Security and Data Processing Policy](#).

14 Supplier Monitoring, Reporting and Continuous Improvement

Bluesource will continue to develop its supplier monitoring and ESG reporting arrangements. Key supplier information may be recorded through the Company's supplier register, supplier tracking log, ESG reporting processes, monthly rolling ethics reporting log, or equivalent management reporting mechanisms.

Monitoring may include supplier policies, carbon reduction plans, net zero targets, emissions reporting, sustainability metrics, Supplier Code of Conduct compliance, supplier risks, improvement actions, assurance activity and corrective actions.

Bluesource will also monitor progress against its environmental objective that at least 85% of suppliers maintain environmental or sustainability policies by 2027, as measured through supplier ESG screening. The Company will review available supplier ESG data periodically and use it to inform engagement, procurement decisions, supplier reviews and ongoing improvement activity.

Supplier ESG information will be reviewed at a frequency proportionate to supplier risk and, where appropriate, at onboarding, scheduled supplier review, contract renewal, following a material change, incident or allegation, or where monitoring identifies deterioration, missing evidence or non-compliance.

Supporting supplier governance records will define the supplier population measured, evidence criteria, reporting frequency, calculation methodology and any improvement action required where progress is below target.

Records of procurement decisions, supplier assessments, approvals, exceptions, supporting evidence, reviews, monitoring activity and corrective actions should be documented and retained in accordance with applicable legal, contractual, information security and company record-retention requirements.

The following RACI-style summary supports supplier monitoring, reporting and continuous improvement by defining the roles responsible for maintaining supplier ESG information, reviewing progress, escalating concerns and using supplier data to inform ongoing procurement and supplier governance decisions.

Supplier Monitoring Activity	Head of Operations	Senior Management	Supplier Owner / Business Owner	Finance / Information Security	Suppliers
Maintaining supplier ESG information, monitoring records, supplier risk indicators, assurance evidence and improvement actions	A	I	R	C	C

Reviewing supplier ESG data, environmental policies, carbon reduction plans, net zero targets and sustainability metrics	A	I	R	C	C
Monitoring progress against supplier ESG objectives, including the target that at least 85% of suppliers maintain environmental or sustainability policies by 2027	R/A	I	C	C	I
Escalating supplier concerns, non-compliance, corrective actions or material sustainability risks identified through monitoring	A	I	R	C	R

RACI Definitions:

-  **Responsible (R):** The role responsible for executing the activity.
-  **Accountable (A):** The role with ultimate ownership and decision-making authority.
-  **Consulted (C):** Roles that provide input or expertise prior to decisions or actions.
-  **Informed (I):** Roles that are notified of outcomes or updates.

15 Alignment with the United Nations Global Compact

Bluesource's sustainable procurement approach supports the Company's alignment with the United Nations Global Compact Ten Principles by embedding supplier expectations on human rights, labour standards, environmental responsibility and anti-corruption into procurement and supplier management activity. In particular:

-  **Human Rights — Principles 1 and 2:** supplier due diligence supports respect for internationally proclaimed human rights and reduces the risk of complicity in human rights abuses through the supply chain.
-  **Labour — Principles 3 to 6:** supplier expectations support fair labour practices, lawful working conditions, non-discrimination, prevention of forced labour and abolition of child labour.
-  **Environment — Principles 7 to 9:** procurement decisions support a precautionary approach to environmental challenges, promote environmental responsibility and encourage lower-impact technologies, energy-efficient solutions, digital-first working and responsible resource use.
-  **Anti-Corruption — Principle 10:** transparent procurement, supplier governance, ethical conduct expectations and reporting routes support the Company's zero-tolerance approach to bribery, corruption, extortion, fraud and unethical conduct.

16 Alignment with the United Nations Sustainable Development Goals (SDGs)

This policy contributes to relevant United Nations Sustainable Development Goals by embedding responsible procurement, supplier due diligence, ethical business conduct, environmental stewardship and supply chain accountability into Bluesource's purchasing and supplier management activities. In particular, the policy supports:

-  **SDG 8 — Decent Work and Economic Growth:** by expecting suppliers to maintain fair labour practices, safe working conditions, respect for human rights, non-discrimination, appropriate grievance or reporting mechanisms, and controls to prevent forced labour, child labour, human trafficking and exploitative employment practices.
-  **SDG 9 — Industry, Innovation and Infrastructure:** by supporting responsible, secure and resilient technology services, cloud and SaaS solutions, digital collaboration, information security, data protection, business continuity and innovative approaches that reduce unnecessary resource consumption.

-  **SDG 10 — Reduced Inequalities:** by encouraging supplier commitments to equality, diversity, inclusion, anti-discrimination and equal opportunities within their own operations and, where relevant, their supply chains.
-  **SDG 12 — Responsible Consumption and Production:** by promoting lifecycle procurement, responsible resource use, reduced paper and waste, reuse, repairability, recycling, responsible disposal, sustainable materials and supplier environmental due diligence.
-  **SDG 13 — Climate Action:** by considering supplier environmental policies, carbon reduction plans, net zero commitments, renewable energy use, energy efficiency, greenhouse gas emissions maturity and wider Scope 3 supply chain impacts.
-  **SDG 16 — Peace, Justice and Strong Institutions:** by supporting ethical procurement, anti-bribery and anti-corruption controls, transparent decision-making, supplier accountability, whistleblowing or reporting routes, conflict-of-interest management and appropriate corrective action where non-compliance is identified.
-  **SDG 17 — Partnerships for the Goals:** by engaging suppliers, customers and partners in responsible business practices, ESG monitoring, supplier assurance, continuous improvement and shared progress towards sustainable procurement and responsible supply chain management.

17 Roles and Responsibilities

The following RACI-style summary defines ownership, accountability and supporting responsibilities for the implementation, maintenance and review of this policy. It is intended to ensure that sustainable procurement requirements are applied consistently, proportionately and transparently across supplier selection, onboarding, monitoring and review activities.

Sustainable Procurement Activity	Head of Operations	Senior Management	Managers / Employees involved in procurement	Supplier Owner / Business Owner	Finance / Information Security	Suppliers
Policy ownership, review and maintenance	R/A	C	I	I	C	I
Applying sustainable procurement requirements to supplier selection, onboarding, renewal and review	C	I	R	A	C	I
Maintaining supplier governance records, including supplier ESG information, risk indicators, assurance evidence and improvement actions	A	I	C	R	C	C
Complying with Bluesource supplier requirements and providing requested sustainability, ESG, legal, contractual, security or assurance information	I	I	I	C	C	R/A
Escalating supplier concerns, suspected non-compliance, corrective actions or material sustainability risks	A	I	R	R	C	R

RACI Definitions:

-  **Responsible (R):** The role responsible for executing the activity.
-  **Accountable (A):** The role with ultimate ownership and decision-making authority.
-  **Consulted (C):** Roles that provide input or expertise prior to decisions or actions.
-  **Informed (I):** Roles that are notified of outcomes or updates.

18 Breaches and Corrective Action

Any suspected breach of this policy, the Supplier Code of Conduct, contractual requirements or applicable law should be reported to the relevant line manager, the Head of Operations or another appropriate internal contact. Bluesource will take a proportionate approach to supplier non-compliance, which may include requesting further information, agreeing corrective actions and improvement timescales, increasing monitoring or assurance activity, pausing further procurement activity, seeking alternative suppliers where practicable, or terminating or not renewing supplier relationships where serious or unresolved non-compliance exists.

19 Review

This policy is owned by the Head of Operations and will be reviewed annually to ensure continued alignment with:

- UN Global Compact principles;
- current legislation, regulation, contractual requirements and applicable customer assurance expectations; and
- best practice in sustainable procurement, ESG governance and responsible business conduct.

20 Sign Off

On behalf of bluesource	
Name	Nick Jaggers
Position	Head of Operations
Signature	
Date	16 September 2026

21 Revision History

Revision Date	Reviser	Description of Revision
16/09/2026	Nick Jaggers	Policy converted into a Sustainable Procurement Policy and expanded to align with Bluesource's Environmental Policy, Supplier Code of Conduct, supplier ESG monitoring, UNGC principles, relevant SDGs, lifecycle and whole-life value controls, supplier evidence requirements, RACI responsibilities, monitoring triggers, record-retention expectations and training/awareness requirements.