

**Ethical Procurement Policy**  
**Strategic Data Consultancy Ltd**

**Document Ref:** SDC-POL-EP-001

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**Date:** 16 April 2026

**Review Date:** 15 April 2027

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### **1. Purpose**

This policy sets out Strategic Data Consultancy Ltd's (SDC) commitment to ethical procurement and responsible sourcing within its operations and supply chain. SDC is committed to conducting business with integrity, ensuring that suppliers and partners operate in a manner consistent with legal, ethical, and environmental standards.

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### **2. Scope**

This policy applies to all procurement activities undertaken by SDC, including the selection, engagement, and management of suppliers, subcontractors, and service providers.

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### **3. Responsibility**

Given the size and structure of the business, overall responsibility for ethical procurement sits with:

John Sutherns – Director

All individuals involved in procurement activities on behalf of SDC are expected to comply with this policy and apply appropriate judgement when selecting and working with suppliers.

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### **4. Ethical Procurement Principles**

SDC will:

- Act with honesty, integrity, and transparency in all procurement activities
  - Treat suppliers fairly and without discrimination
  - Avoid conflicts of interest and declare any potential conflicts where they arise
  - Ensure procurement decisions are based on quality, value, and suitability
  - Maintain appropriate records of procurement decisions where relevant
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### **5. Supplier Standards**

SDC will seek to work with suppliers who:

- Operate in compliance with applicable laws and regulations
  - Demonstrate ethical business practices
  - Do not engage in modern slavery, forced labour, or exploitation
  - Provide safe working conditions for their personnel
  - Show consideration for environmental impact where applicable
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## **6. Supply Chain Management**

SDC will:

- Engage suppliers and subcontractors who are competent and appropriately qualified
  - Where reasonably practicable, assess suppliers for ethical and professional standards
  - Avoid engagement with organisations where there is known or suspected unethical behaviour
  - Monitor supplier performance where appropriate to ensure standards are maintained
  - Where appropriate, SDC will undertake proportionate due diligence on suppliers, including consideration of competence, insurance, and alignment with relevant polici
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## **7. Environmental and Social Considerations**

SDC will, where practicable:

- Consider environmental impact in procurement decisions
  - Support suppliers who demonstrate sustainable practices
  - Align procurement activities with its Environmental Policy and Carbon Reduction Plan (CRP) objectives
  - Encourage responsible sourcing and efficient use of resources
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## **8. Compliance and Monitoring**

SDC will:

- Maintain compliance with relevant legislation relating to procurement and business conduct
  - Review procurement practices periodically to ensure alignment with this policy
  - Take appropriate action where ethical concerns are identified
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## **9. Related Policies**

This policy should be read alongside:

- Anti-Bribery Policy (SDC-POL-ABC-001)
  - Modern Slavery Policy (SDC-POL-MOD-001)
  - Environmental Policy (SDC-POL-ENV-001)
  - Whistleblowing Policy (SDC-POL-WB-001)
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## **10. Monitoring and Review**

This policy will be reviewed annually or in response to:

- Changes in legislation
  - Changes in business operations
  - Identified risks or concerns within the supply chain
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## **11. Commitment**

Strategic Data Consultancy Ltd is committed to maintaining ethical procurement practices and working with suppliers who share its values of integrity, responsibility, and professionalism.

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**Signed:**

John Sutherns  
Director

