

# Partega Construction Company Procurement Policy

**Effective Date:** 2025-01-12

**Version:** 1.0

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## 1. Introduction

This Procurement Policy ("Policy") outlines the principles, guidelines, and expectations that Partega Construction Company ("Partega") follows when engaging in procurement activities. It aims to ensure that all suppliers and contractors provide goods and services that align with Partega's commitment to quality, sustainability, ethics, and social responsibility. This Policy applies to all procurement decisions and practices across the EU and is intended for all suppliers, contractors, and vendors involved with Partega.

Partega is committed to maintaining the highest standards of integrity, transparency, and accountability. We operate in compliance with all applicable laws and regulations in the European Union and hold all suppliers to the same standards regarding human rights, environmental protection, and ethical business practices.

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## 2. Objectives of the Procurement Policy

The objectives of this Procurement Policy are to:

- Ensure compliance with applicable laws and regulations within the EU.
- Promote sustainability, fairness, and transparency in all procurement activities.
- Foster relationships with suppliers that adhere to the highest ethical, environmental, and human rights standards.
- Mitigate risks associated with the supply chain by ensuring suppliers' compliance with Partega's core policies, including the Human Rights Policy, Environmental Policy, and Ethics Policy.

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### 3. Supplier Selection Criteria

To be considered a supplier or contractor for Partega, all potential suppliers must meet the following selection criteria:

- **Compliance with Laws and Regulations:** Suppliers must operate in full compliance with local, national, and international laws and regulations, including labor laws, health and safety standards, and environmental regulations.
- **Human Rights Compliance:** Suppliers must adhere to Partega's Human Rights Policy, which prohibits any form of child labor, forced labor, discrimination, and any other violations of human rights. Suppliers must respect and promote the rights and dignity of workers, ensuring fair wages, safe working conditions, and equal treatment of employees regardless of gender, race, ethnicity, religion, or disability.
- **Environmental Responsibility:** Suppliers must demonstrate compliance with Partega's Environmental Policy, which includes the responsible use of resources, waste reduction, and adherence to sustainable environmental practices. Suppliers must actively contribute to minimizing the environmental impact of their operations, including compliance with EU environmental regulations and standards.
- **Ethical Business Practices:** Suppliers are expected to follow Partega's Ethics Policy, which requires them to operate with honesty, integrity, and fairness. This includes prohibiting bribery, corruption, and conflicts of interest. Suppliers must not offer or accept any bribes, kickbacks, or unethical incentives in connection with any transactions or dealings with Partega.
- **Financial Stability and Capability:** Suppliers must have the financial capacity and technical capability to provide the goods and services required by Partega on time and within budget, as well as the capacity to support quality management and risk mitigation practices.

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- **Quality Assurance:** Suppliers must meet Partega's standards for quality, which are defined by relevant construction industry certifications and established international quality standards.

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#### 4. Supplier Engagement and Contractual Obligations

- **Supplier Compliance Certification:** Before entering into a contract, all suppliers must acknowledge and certify that they have read and understood Partega's Human Rights, Environmental, and Ethics Policies. Suppliers are required to submit documentation to demonstrate compliance with these policies, such as relevant certifications, audit reports, and evidence of internal controls.
- **Contractual Requirements:** All agreements with suppliers will include clear clauses that mandate compliance with Partega's Human Rights Policy, Environmental Policy, and Ethics Policy. Any violations of these policies may result in termination of the contract, suspension of business relations, or legal actions.
- **Monitoring and Auditing:** Partega reserves the right to conduct regular audits, assessments, and inspections of suppliers' operations to verify compliance with these policies. Suppliers must cooperate with any such audits and provide necessary access to relevant records and facilities.

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#### 5. Ethical Procurement Practices

Partega is committed to conducting all procurement activities in an ethical, transparent, and responsible manner. This includes:

- **Fair Treatment of Suppliers:** All suppliers are treated fairly, and selection is based on clear, objective, and non-discriminatory criteria. Supplier decisions will be made based on the best value, which includes not only cost but also factors such as quality, reliability, environmental impact, and ethical considerations.

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- **No Conflicts of Interest:** Partega ensures that procurement decisions are made impartially. Employees involved in procurement are required to declare any personal or financial interests that may influence their decision-making.
  - **Transparency:** Partega ensures transparency in all procurement processes, including bid evaluation, contract negotiation, and vendor selection. We maintain an open and transparent relationship with suppliers, providing equal opportunities for all qualified vendors.
  - **Anti-Bribery and Anti-Corruption:** Partega maintains a zero-tolerance policy towards bribery and corruption. Suppliers are prohibited from offering gifts, payments, or other incentives to influence procurement decisions. Any violation of this policy will result in immediate contract termination and possible legal action.

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## 6. Supplier Relationship Management

- **Continuous Improvement:** Partega believes in fostering long-term relationships with suppliers. We seek to build mutually beneficial partnerships based on trust, collaboration, and a shared commitment to continuous improvement. We encourage suppliers to engage in ongoing dialogue and provide feedback on how processes and relationships can be improved.
- **Capacity Building:** Partega supports suppliers in meeting our expectations regarding human rights, environmental practices, and ethical standards. We offer training, workshops, and support for suppliers to help them align their practices with our policies.
- **Performance Evaluation:** Suppliers will be regularly evaluated based on their performance, including adherence to Partega's policies, quality of goods and services, delivery timelines, and overall reliability. Continuous performance assessments help Partega identify areas for improvement and ensure the highest standards are maintained.

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## 7. Sustainability and Risk Management

Partega is committed to minimizing environmental impact and promoting sustainability throughout the supply chain. We aim to:

- **Reduce Carbon Footprint:** Where possible, we will prioritize suppliers who demonstrate a commitment to reducing their carbon footprint, using energy-efficient processes, and promoting sustainable practices.
- **Mitigate Supply Chain Risks:** We assess and manage risks in the supply chain, including risks related to environmental sustainability, human rights, and ethical business practices. We work closely with suppliers to identify and address potential risks before they impact operations.
- **Green Procurement:** Partega encourages the use of environmentally friendly products and services, including materials that are recyclable, sustainable, and certified by recognized environmental standards.

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## 8. Reporting and Grievances

- **Whistleblowing and Reporting Violations:** Partega encourages employees, suppliers, and third parties to report any violations of this policy. Suppliers must have mechanisms in place to report grievances or concerns regarding compliance with human rights, environmental practices, or ethical standards. Reports will be handled confidentially and investigated thoroughly.
- **Non-Retaliation:** Partega maintains a non-retaliation policy. Suppliers and employees who report violations in good faith will not face retaliation or adverse consequences.

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## 9. Policy Review and Updates

This Procurement Policy will be reviewed annually and updated as necessary to ensure it remains aligned with legal requirements, industry standards, and Partega's business objectives. Suppliers will be informed of any significant changes to the policy.

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## 10. Conclusion

Partega is committed to maintaining the highest standards of ethical, social, and environmental responsibility in all of its procurement activities. We expect all suppliers to align with our policies on human rights, environmental sustainability, and ethical business practices. By working with Partega, suppliers play a vital role in helping us achieve these objectives and deliver quality, responsible construction projects in the EU and beyond.

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### Signed by:

[Name]

[Title]

Partega Construction Company

[Date]

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This procurement policy reflects Partega's commitment to ethical, sustainable, and socially responsible practices and serves as a framework for managing supplier relationships. By ensuring compliance with this policy, Partega aims to create a positive impact throughout its supply chain and the communities it serves.