

Phoenix Energy Holdings Ltd

Procurement Policy extract on Ethics, Environment, Sustainability and Code of Conduct

February 2026

SUPPLIER SELECTION – POLICY

(extract from Procurement Policy – PEHL14 Section 5.1)

- The Phoenix Group will procure goods, services and works, as required, to enable the delivery of all business objectives. Obtaining value and efficiency through the appropriate use of competitive tendering whilst, at the same time, affording preference to those service providers and suppliers who demonstrate sound Health, Safety & Environmental considerations commensurate with those required by the Phoenix Group.
- The selection of any product or service to be supplied to the Phoenix Group will be determined by those suppliers and service providers who can clearly demonstrate all, or some, of the following, depending upon the applicability with regards to the nature of the product and/ or service being procured:
 - Standard and quality;
 - Competitive pricing;
 - Appropriate levels of insurance and indemnity cover;
 - Sound H&S policies and procedures;
 - Occupational H&S of both the work force employed directly by the supplier organisation and through their supply chain;
 - Observation of relevant Human Rights and Modern Slavery legislation;
 - Sustainable environmental practices with regards to the usage of renewable raw materials, where appropriate;
 - Environmental standards with regards to processes adopted before, during and after production;
 - Equal opportunities of employment;
 - Sound Business Ethics; and
 - Compliance with UK bribery legislation.
- Suppliers / service providers will be selected that can ensure that goods and services to be delivered conform to current Group Health and Safety policy. In addition, the Group may not select to procure goods and / or services from suppliers or service providers where the manufacturing, supply or delivery process does not conform to current Health and Safety legislation.
- Preference in supplier / service provider selection should always be given to those suppliers / service providers who alongside the most economic advantageous commercial terms, also demonstrate sustainable initiatives within their own environmental policy.
- For product suppliers, particular emphasis should be placed upon the usage of renewable raw materials, environmentally sound production procedures, logistics procedures that incur a minimum environmental impact, recycling

initiatives and environmental standards in relation to the safe disposal of any resultant waste products.

- All suppliers/ service providers should demonstrate sound ethical business practices which should include, where appropriate, some - if not all - of the following:
 - ethical trading;
 - ethical sourcing;
 - social accountability;
 - social auditing;
 - corporate social responsibility;
 - corporate citizenship;
 - codes of conduct;
 - reputation assurance

(extract from Procurement Policy – PEHL14 Section 5.2)

- The Phoenix Group wishes to attain the highest possible standards with regards to how it conducts its own business practices and therefore seeks to ensure that any Supplier considered for selection holds the same aspiration.
- To this end, the Phoenix Group shall encourage Suppliers to develop and maintain their own Code of Conduct which reflects the ethical business practices outlined in 5.1.6 above and cascade this approach throughout all employees within their organisation as well as any sub-contracted Provider.
- As well as the headline items that are referenced in 5.1.6, with regards to Employee engagement, the Phoenix Group shall also require Suppliers to review and examine:
 - Sustainability standards & practices.
 - Ensure a fair and equitable workplace environment.
 - Observe and implement safe working practices throughout their organisation.
 - Ensure that all applicable worker related welfare legislation, including but not limited to minimum wage requirements and Working Time Directives, are appropriately and promptly implemented.

- With regards to the environmental aspect of ethical conduct, Suppliers to the Phoenix Group are encouraged to:
 - Adhere to all relevant environmental legislation.
 - Review, monitor and seek to reduce the consumption of non-renewable energy as well as minimise their entire carbon footprint.
 - Promote the use of environmentally friendly technology with regards to general business practices such as those that will facilitate the reduction in business travel and other resources.
 - Promote recycling throughout all areas of their operation – both with regards to the reduction in waste and the encouragement in usage of recycled materials.

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