



Corporate and Social Responsibility Policy

Needlers Limited

The main aim of Needlers Ltd Corporate and Social Responsibility Policy is to integrate its values into all business operations and to consider the interest of all its stakeholders (shareholders, employees, customers, suppliers, the general community and the environment) in all the Group's policies and procedures and actions

Core Values

- Passionate
 - We're passionate about getting it right for our customers
- Willing to be adventurous
 - We're not afraid to think differently, pushing boundaries to make a real difference to our customers. By being open minded and willing to change, we do things better
- Respect
 - We have personal & professional respect for customers, suppliers and each other. We treat people as we like to be treated
- Team work
 - We empower people through our culture, working without silos or politics. We're not afraid to make mistakes and learn from them as a team

Commitment

The Group is committed to:

- Acting in a socially responsible way
- Continuously improving our Corporate and Social Responsibility (CSR) strategy
- Encouraging our business partners to match our commitment
- Ensuring that our employees are mindful of the effect of their actions on all natural resources
- Complying with all relevant legislation
- Complying with the ETI (Ethical Trading Initiative) Base Code
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Purpose and Aims

- The policy is designed to ensure that all stakeholders are aware of the meaning of CSR, and how we propose to work towards achieving it. The CSR policy applies throughout all our business activities and governs our approach to procurement and delivery of services

We have implemented this policy because we:

- Aim to be responsible
- Aim to set an example of good practice
- Are committed to the principles of the ETI base code

Standards of business conduct

- We recognise that good CSR embraces all aspects of sustainable development and the way we affect people through our business operations
- We believe that a responsible approach to developing relationships between Group companies and the communities they serve, global or local, is a vital part of delivering business success
- We will assess which social issues have the most relevance to each contract we undertake, and decide at what stage in the procurement process this policy could most effectively and legally be included
- When carrying out our business, in consultation with our customers, we will determine the environmental, social and economic issues
- Our contracts will clearly set out the agreed terms, conditions and the basis for our relationship
- We will continually review our policies and business practices to encourage engagement with small and medium enterprises and to promote the development of the regional supply chain
- We shall operate in a way that safeguards against unfair business practices

Corporate Governance

- We will comply with all the laws that regulate our business
- We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards, guided by our Values.
- We will ensure that all personal and corporate conflicts of interest that affect our business are declared, and we will and seek guidance from higher authority before acting
- We endeavour to ensure that stakeholders have confidence in the decision-making and management processes of the Procurement Service, by the conduct and professionalism of all staff. We do this by continually training and developing our staff
- We will continually review all activities to ensure best practice is observed at all times, and feedback on performance will be actively sought and we will allow our customers and vendors to give feedback on our performance and ensure that all customer comments are analysed, responded to and where appropriate, acted upon

Environment

- It is our objective to endeavour to reduce our impact on the environment through a commitment to continual improvement
- We will commit to continually improving our working practices and continue to work with our suppliers to reduce their impact on the environment
- We will assess the environmental impact of the production, use and disposal associated with the main goods we use
- Our customers will be made aware of the key issues involved in procurement so they can make informed purchases to reduce their impact on the environment
- We will ensure that all wood and paper products used come from forests independently certified as well-managed according to the standards of the Forest Stewardship Council (FSC), or from recycled materials whenever possible

Equality and Diversity

- We want to eliminate discrimination on any grounds and promote equality of opportunity in the delivery of our services and in the procurement of goods and services
- We will ensure that our customers and vendors are able to work together in confidence and be treated with respect by each party

Sustainability

- A Sustainable Procurement Policy will be maintained, setting out the principles, policies and procedures on which the Group's sustainable business activity will be based
- The policy will act as a prompt to staff to consider sustainability as a factor in all purchasing decisions
- We seek to minimise the adverse environmental effects of our business activities

Impact on Society

- We will consider our impact on the local and wider community
- Dialogue with local communities shall be encouraged for mutual benefit
- We will take steps to understand how we can most effectively support the needs of the local community and respond to those accordingly
- We will assess which social issues have the most relevance to each contract we undertake and decide at what stage in the procurement process this policy could most effectively and legally be included

Ethics and Ethical Trading

- Needlers expects all suppliers we engage with to ensure their goods, materials and labour-related supply chains:
 - Fully comply with the Modern Slavery Act 2015
 - Are transparent, accountable and auditable
- We will ensure transparency through our supply chains, so we understand where all our products are manufactured
- Training will be provided to relevant people on environmental and social issues affecting our supply chains
- We will ensure that suppliers uphold the workplace standards and behaviours consistent with the ETI Base code requirements
- We shall encourage suppliers to adopt responsible business policies and practices for mutual benefit
- Suppliers are regarded as partners and we will work with them to help us achieve our policy aspirations in the delivery of our products and services
- A documented environmental and social assessment will be undertaken for every new contracted supplier
- Needlers have created a process to ensure the ethical compliance and capabilities of all suppliers manufacturing products which carry our Needlers brand
- We are committed to ensuring that the welfare of workers and labour conditions within our supply chain meet or exceed the recognised standards as laid down in the ETI base code
- Where appropriate, our tender specifications include questions to reflect our desire for sustainable procurement
- We hold regular meeting with suppliers to support these ideas
- We will continue to work with suppliers to:
 - Promote more environmentally friendly products and promote these to our customers
 - Consolidate merchant and supplier deliveries
 - Reduce the amount of packaging and transit where possible
 - Implement schemes to take-back, recover, re-use and recycle products at the end of their use/life

Biodiversity

- We actively encourage the use of sustainable practices in the maintenance of the Group's premises.

A. J. Needler
Managing Director
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