

Ethical and Sustainable Procurement Statement

The scope of this policy statement extends to all Group activities. It covers all Group sites and offices, in the Isle of Man, Brazil, Malaysia and Singapore, as well as all its subsidiaries, which include:

- Valeberg Ltd
- Valeberg Capital Ltd
- Valeberg Commodities Ltd
- Valeberg Ecosolutions Ltd
- Valeberg Engineering Ltd
- Valeberg Property Management Ltd
- Valeberg Telecom Ltd
- Valevox Ltd

The company is committed to procuring goods and services with due regard to their environmental, ethical, and social impact, both in the immediate timescale and over the expected life cycle of the procured goods or services.

The company encourages its suppliers or any of their employees, subcontractors, or agents to carry out their procurement with the above intention.

In conjunction with the company's other policies and as a foundation to this one, the company recognises that all procurement must be carried out with:

1. A high level of ethical behaviour, integrity and openness.
2. Due regard for the well-being of all employees affected by the company's procurement processes, including not dealing with suppliers where health and safety, equal opportunities, diversity, labour, anti-slavery or other relevant social practices are not treated with the same importance as laid down in the company's policies.
3. Due regard for the environmental effect and sustainability of raw materials used in providing any goods or services, priority will be given to suppliers offering materials under a responsible sourcing certification scheme.
4. Priority is given to goods and services offered within the local community to the company's offices, relevant project or site, wherever possible.
5. Preference is shown to suppliers who can demonstrate a commitment to reducing their carbon emissions, water usage, waste, and packaging and/or increasing their recycling, including reusing materials and avoiding landfills. Suppliers are encouraged to implement an appropriate site management waste plan or conduct a pre-demolition audit to minimise waste from their provision of goods and services.
6. Suppliers offering goods or services with low energy consumption or low embodied carbon content will be considered. Priority will be given to suppliers offering materials with an Environmental Product Declaration (EPD).

7. Priority is given to goods and services using non-toxic materials or refrigerants without a high global warming potential. The use of refrigerants scheduled for future ban is discouraged, and suppliers offering more suitable alternatives are prioritised.
8. Priority is given to goods and services using materials designed to resist degradation against environmental factors (including biological agents or pollutants), material factors (such as corrosion and discolouration), or factors associated with pedestrian or vehicular traffic.
9. Targeting best value in procuring goods or services based not just on price but on environmental, ethical, legal and social considerations. As part of the company's procedure for approving all suppliers, a pre-qualification questionnaire is issued to assess aspects of the supplier's environmental, ethical, and social procurement processes. However, providing evidence of a successful external audit against the Common Assessment Standard would be accepted in place of this requirement.

Valeberg's Management Board approved this statement on behalf of the Group.

Darren J Harris

Founder / Managing Director

For and on behalf of the Valeberg Group of Companies

1st August 2025