

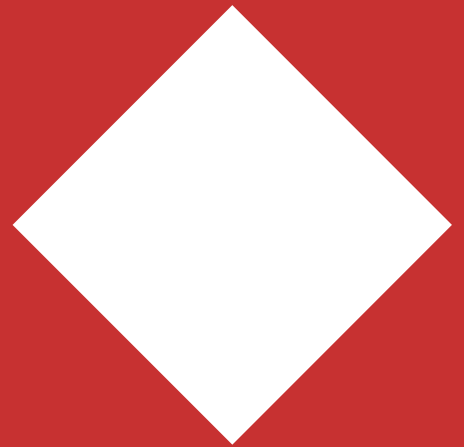


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# Responsible Sourcing Policy

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## DOCUMENT INFORMATION

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# 1 RESPONSIBLE SOURCING POLICY STATEMENT

As the UK's leading manufacturer and supplier of roofing and cladding products, Marley Group are committed to sourcing raw materials and managing the supply chain in a responsible and sustainable manner.

Our approach towards responsible sourcing encompasses the complete life cycle of our products, from raw material extraction and manufacturing to the supply of our products to customers and, ultimately, their disposal at end of life.

We undertake to operate ethically, to comply with applicable legislation, and to take responsibility for our actions with regard to quality, health and safety, workforce welfare and employment practices, environmental impact, water and waste management, the social and environmental impacts of transportation, and the reduction of greenhouse gases associated with the production of materials and products.

We are actively engaged in the development of products that improve the sustainability of the built environment and the use of resources.

We also develop and train our employees to ensure traceability and continuous improvement and support sustainable communities by providing employment and economic activity through fair operating practices.

Marley Group acknowledges the needs of stakeholders affected by its activities and those of its supply chains and is fully committed to meeting customer requirements with regards to product and service quality, whilst recognising the impact that the company's activities can have upon local communities and the environment.

We manage for long term financial performance, providing stability and enabling long term investment in social and environmental aspects which underpin the economy.

The Company has set policies relating to Resource Use; Waste Management; Water Extraction; Carbon Reduction, Transport, Employee Training & Competency; and Local Communities which are detailed in Appendix 1 to this document



Stuart Nicholson,

MD 26/06/25

## 2 PURPOSE

The purpose of this document is to capture the Company's statement of intent in respect to Responsible Sourcing management control and continued improvement.

## 3 SCOPE

This policy applies to all workers within Marley and any interested parties such contractors and customers. Awareness and adherence to this policy by employees, suppliers and persons working on behalf of the company is mandatory.

## 4 OBJECTIVES

Communication and awareness of the Responsible Sourcing Policy is essential as this defines Marley's Responsible Sourcing embedded processes. To support the awareness of this policy, is to be made available to all interested parties using the below as a minimum:

- ▲ Notice boards, including electronic versions
- ▲ The company Management System
- ▲ Company Website
- ▲ Employee and Contractor Induction Training

## 5 GUIDELINES & PROCEDURES

Evidence of signed acknowledgements of the Responsible Sourcing policy is required by all employees. The acknowledgements must be stored on the management system for evidence to support BES 6001 audits.

Acknowledgements are mandatory following a version update of the Responsible Sourcing Policy. It is good practice to re-issue the policy on an annual frequency to refresh employee awareness. It is advised that acknowledgement signatures are obtained to support evidence of refresher awareness.

Policy changes will be communicated to Department heads by Central EHSQ. It is the department heads responsibility to ensure the policy is communicated and acknowledged by their direct employees.

## 6 RESPONSIBILITIES

The Company will ensure that staff are provided with the time, training, and support to learn, understand, and implement this Responsible Sourcing Policy.

## 7 Appendix 1

Marley Group has set out the following policies in support of its commitment to the environmental and social requirements of BES6001 'Responsible Sourcing of Construction Products'

- ▲ Resource Use policy
- ▲ Carbon Policy
- ▲ Waste Management Policy
- ▲ Water Extraction Policy
- ▲ Transport Policy
- ▲ Employee and Competency Policy
- ▲ Local Communities Policy
- ▲ Energy Policy
- ▲ Lifecycle Assessment Policy
- ▲ Trafficking and Modern Slavery

### Resource Use Policy

Marley Group is committed to continuous improvement of its environmental performance, with a view to reducing environmental impacts to levels not exceeding those corresponding to economically viable application of best available technology.

Wherever reasonably practicable, the Company will make use of renewable materials over non-renewable materials, use fewer materials, re-use materials, use recycled materials and use recyclable materials.

Where appropriate, the environmental stewardship at source of constituent materials is assessed at the point of procurement and verification confirmed by either certification to ISO 14001 or third party environmental audit report.

### Carbon Policy

As a leading manufacturer, we are firmly committed to reducing embodied carbon in our products through sustainable improvements to product composition and manufacturing processes. This will be achieved by identifying, measuring and targeting the individual carbon constituents.

- ▲ Reduction targets are set and regularly reviewed. As well as underpinning our aims for lower greenhouse gas emissions, these also reflect our belief that energy efficiency is a key factor for business success.
- ▲ We encourage suppliers to make reductions in the embodied energy of the raw materials we purchase from them. We take account of supplier and material performance in this respect when making purchasing decisions.
- ▲ We employ research and development teams who are challenged to devise new formulations and to reduce embodied or process energy by using new materials or techniques.
- ▲ We strive to adopt best practices on energy efficiency by collaboration with industry bodies, following Government guidance and keeping informed of new technologies.
- ▲ We monitor process energy consumption and any adverse trends identified are reacted and corrected.

- ▲ We engage all employees to reduce energy usage, where practical, by communicating our policies and targets as well as acting on suggestions for improvements.

## Waste Management Policy

All manufacturing sites annually record the amount of each type of waste produced. In addition, these sites are required to reduce, reuse, or recycle as much of their waste as possible to divert waste from landfill or incineration without energy recovery in accordance with the waste hierarchy.

Objectives are set against annual target reductions which are monitored closely and reported annually to stakeholders.

## Water Extraction Policy

The Company's manufacturing sites are committed to managing their water usage, treatment and reuse or disposal of wastewater in a responsible manner to prevent contamination of natural water courses and rivers.

Each site annually records water usage measured as m<sup>3</sup> value against total tonnage of manufactured product. The results of extracted water usage set against target reductions are monitored closely and reported annually to stakeholders.

## Transport Policy

As the UK's leading manufacturer and supplier of roofing and cladding products, Marley Group is committed to reduce the adverse social and environmental impacts of transport associated with the delivery of raw materials to its sites and the delivery of products to customers.

The Company undertakes to ensure that transport distances associated with delivery of constituent materials and manufactured products are minimised through effective route planning, local sourcing of materials, and wherever possible, optimisation of loads.

The types of transport used, and distances travelled to deliver the key constituent materials will be monitored and regularly reviewed, and alternative delivery methods will be investigated where feasible.

As set out in the Employee & Competency policy, each staff member is made aware of the business's expectations in terms of adopting the principles of BES 6001. This includes the optimisation and reduction of impacts associated with unnecessary travel to and from, or around the production site.

Records are maintained, environmental aspects register is updated and reviewed in accordance with ISO 14001, and objectives and targets set, for the reduction of impacts directly relating to the transport of materials, goods and people involved within the business operation. These targets and objectives are reviewed annually, and the results reported to stakeholders.

## Employee and Competency Policy

As the UK's leading manufacturer and supplier of roofing and cladding products, Marley Group ensures the competence and awareness of all its employees and suppliers, to work with, and personally contribute wherever possible, to the Company's responsible sourcing aims and commitments.

The Company ensures that its commitment to responsible sourcing is understood by all employees and job applicants through its recruitment, induction, and training processes, and is committed to best employer practice in all areas of employment including recruitment, career development, training, and welfare. All allegations, grievances and complaints are dealt with seriously, confidentially, and speedily, using a recognised procedure to ensure fair and consistent treatment of all employees.

Marley Group aims to work at all times within current employment legislation and best practice guidelines to ensure a fair and equitable recruitment process. It will seek to employ the most suitable candidates, and actively aim to recruit from the local communities.

The business takes a systematic approach towards ensuring that all employees have, and understand, clearly defined responsibilities, so that any additional training needs may be identified on an individual basis.

Accurate company training records are maintained which provide the measures necessary to review employee competency levels, and the effectiveness and scope of employee training, including assessment of the number of annual training hours, appraisals and progress towards personal development plans, completion of work related NVQs or other professional qualifications.

## Local Communities Policy

At Marley Group we take our relationship with the local community very seriously. We understand that our business, locations, and activities impact on many people in a variety of ways.

The company currently operates at five factory locations throughout the UK, which are monitored to ensure adherence to a minimum set of rules and guidelines, helping to carefully manage the effect of our operations on the local community.

As a company we endeavor to:

- ▲ Offer the facility at all our sites for the local community to raise questions, concerns, or complaints regarding our activities, with a commitment to a minimum response time to all enquiries within ten days from receipt.
- ▲ Wherever possible, limit vehicle movements to and from production sites within normal business hours to avoid unnecessary disturbance.
- ▲ Ensure that our production sites are maintained and kept in a condition which meets all health and safety requirements and provides sufficient protection against potential hazards and dangers.

The company will report to stakeholders annually on its local community liaison activities and complaint incidents.



## Energy policy

The business is committed to achieving continual improvement in its energy performance and operates an internal energy management system that covers the energy uses and consumptions associated with product manufacture, company buildings, company cars and workplace vehicles. Fundamental to the success of our energy efficiency are the following:

- ▲ Setting of goals to focus the business on improving energy efficiency
- ▲ Identify and comply with all legal requirements that relate to the company's activities and its use of energy
- ▲ Provide information and training to company employees to raise awareness of energy related issues including best practice
- ▲ Conduct regular and planned maintenance of equipment and plant to ensure efficient performance and optimal energy consumption

## Lifecycle Assessment Policy

As a business, we are aware that the impacts of our activities stretch far beyond production and supply. As a result, Marley Group has adopted a Life Cycle thinking approach, which takes the traditional sustainability focus further to include the full environmental, social and economic impacts of its products over their entire life cycle.

A cradle to grave way of thinking means that consideration is always given to how the business can improve all elements associated with the supply of its products. This includes material extraction, material processing, transportation, distribution, consumption, reuse/recycling, and disposal.

There is also a long-term commitment to having our products 'life cycle assessed' for the purpose of providing comprehensive Environmental Product Declarations. Such declarations will not only allow customers to make a more informed product choice but will also provide verified impact measurements which can be used as a basis of continual environmental improvement.

## Trafficking and Modern Slavery

Marley Group has a zero-tolerance approach to modern slavery and trafficking and is committed to acting ethically in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and trafficking is not taking place anywhere in its business or in any of its supply chains.

The business communicates a zero-tolerance approach to all of its suppliers, contractors and business partners. It is expected that a similar zero tolerance approach will be adopted by these organisations and their own supply chains.

To ensure we comply with chain of custody standards for timber suppliers, due diligence checks will also include a request for confirmation of:

- Compliance to local and regional legislation

- Child labour is not being used in any part of the organisation with no persons under the age of 16 being employed.
- There is no forced labour in place, including but not limited to the retention of personal documents such as passport and identity documents, physical abuse or similar.
- There are no forms of discrimination such as gender, age, or ethnicity.
- Equal opportunities are embedded into the core of the business
- Workers have the right for trade union membership and support

Stuart Nicholson,

MD 26/06/25