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### Babcock sustainable procurement policy

At Babcock we focus on creating a safe and secure world, together with our customers, suppliers, communities and investors. Aligned with the UN Sustainable Development Goals, we work collaboratively to minimise the impact of our operations on the environment, mitigate climate change, ensure the safety of our people and make a positive impact on the communities in which we operate.

#### Our sustainability plan underpins our purpose:

- 1. To reduce to zero the net carbon emissions in our estate, assets and operations by 2040, focusing on clean energy, minimising waste and increasing recycling.
- 2. To provide an active corporate citizenship programme and sustainable procurement initiatives which will support our communities and suppliers.
- 3. To provide a safe and inclusive workplace where every employee feels valued and where we champion a diverse workforce representative of society.
- 4. To deliver robust free cash flows and create sustainable value.

Our supply chain is key to successfully delivering our sustainability plan. We will consider the plans of our suppliers in our sourcing decisions and actively monitor and manage sustainability performance in the supply chain. When selecting suppliers and subcontractors we seek evidence of their ability to meet our requirements against 12 priorities for sustainable procurement as follows:



#### Environmental management -

understand and reduce negative environmental impacts including damage to land, air, water and biodiversity. As a minimum, suppliers are required to identify significant environmental impacts and have documented control measures.

**Energy and carbon** – reduce operational energy use by giving preference to energy efficient products and services. Work with suppliers to quantify and reduce the embodied carbon of key products/materials.

Resource efficiency and waste minimisation – conserve precious resources by using materials efficiently. Give preference to products that can be re-used, recycled and transition to recycled and renewable materials where possible.

Responsible materials - identify and utilise safer materials in products and processes where practical. Identify and secure supply chains for rare earth, conflict minerals and metals. Source products and materials ethically through credible standards where available.



#### Developing skills and talent -

recruit in the local community providing work experience and opportunities for apprentices, graduates, the armed forces and those returning to the workplace.

**Wellbeing** - invest in the wellbeing of the workforce including both physical and mental health.

**Community engagement** – actively and positively engage with the local community and work to avoid disruption to local people. Suppliers are expected to work with us to engage our community when working on Babcock sites.

**Workforce diversity** - promote a diverse and inclusive workforce, reducing barriers to entry for under-represented groups.



**Fair treatment** – demonstrate fair, transparent and equitable sourcing practices, pay on time to agreed terms and pay the workforce proper living wages.

**Ethical sourcing** – ensure respect for human rights and adopt a pro-active approach to identifying and addressing any hidden labour exploitation in wider supply chains. Strive to achieve transparency for higher risk supply chains.

Supply chain development and innovation – engage new business, invest in development to harness innovation and reduce barriers for new entrants.

**Supplier diversity** – provide opportunities for small businesses and value diversity in the ownership and leadership of our suppliers.



The implementation of this policy is the collective responsibility of all suppliers and subcontractors working with their counterparts at Babcock, in accordance with all applicable laws and regulations. Further details can be found in our <u>Sustainable Procurement Supplier Guidance</u> and <u>Supplier Code of Conduct.</u>

David Lockwood, Chief Executive Officer November 2021







# Environmental management

Babcock will embed the highest standards of environmental management and protection. We must understand and reduce negative environmental impacts including damage to land, air, water and biodiversity from Babcock operations and in our upstream supply chains. To support this goal suppliers are required to:

- Maintain or be working towards an ISO 14001 certified management system or be able to demonstrate that operations are managed in accordance with an effective documented environmental management system.
- with the environmental risks associated with the goods or services supplied and be able to demonstrate how those risks are managed. Furthermore, Babcock expects suppliers to progressively reduce emissions to land, air and water where applicable.
- Report and provide details of any enforcement action taken against them in

- the last five years by any national environment agency or regional authority including the lessons learned from those enforcement notices and remediation actions undertaken.
- > Suppliers of Fleet, Plant and Equipment may be requested to provide details of related air emissions to Babcock. Preference will be given to low emission plant and vehicles to meet future requirements. Retrofitting to reduce both PM10, PM2.5 NOx and SO2 is encouraged for non-road mobile machinery and opportunities to utilise alternate fuels such as green diesel and Hydrotreated -Vegetable Oils (HVO) to replace diesel will be sought. Furthermore, opportunities to adopt equipment, which produce zero emissions at the point of use, will also be explored aligned to our zero carbon commitments for our operations.



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### Energy & carbon

Babcock continue to seek opportunities for energy savings and efficiencies and have pledged to reduce to zero the net carbon emissions in our estate, assets and operations by 2040 (Scopes 1 and 2). Babcock have also signed the Business Ambition for 1.5°c Pledge to limit global warming in line with the Paris Agreement, and are working towards verification of our interim 2030 science-based target by the Science Based Targets initiative (SBTi).

We will reduce operational energy use from nonrenewable sources, giving preference to energy efficient products & services and working with suppliers to quantify & reduce the embodied carbon of key products/materials.

To support this goal suppliers are requested to:

- Accelerate efforts to minimise carbon and energy use within their operations and within their supply chain, setting science-based and net zero carbon reduction targets (across Scope 1, 2 and 3 emissions). This includes taking all reasonable steps to:
  - reduce energy use during manufacture, construction and / or delivery;
  - improve energy efficiency of products and services during operational use;
  - adopt lower carbon technology where reasonable and appropriate;
  - develop a suitable management plan to monitor, manage, report and feedback on the performance for the above component(s)
- Gain ISO 50001 or other independent certification for measuring, managing and reducing carbon emissions e.g. The Carbon Trust Standard.
- Understand and plan to provide us with accurate product/service carbon footprint assessments in the future, as we prepare to implement our Scope 3 strategy by 2025. Assessments can either be in the form of a Life Cycle Assessment (LCA), Environmental Product Declaration (EPD) or carbon footprint analysis.
- Suppliers of carbon intensive products and services will be required to share their plans and

- provide any relevant information including scope, carbon inventory source and data assumptions so that the impact of the product or service can be assessed.
- Suppliers of Fleet, Plant and Equipment may be required to provide details of fuel and energy use to Babcock and are encouraged to switch to electric powered vehicles or equipment that produces zero emissions at the point of use.



# Resource efficiency and waste minimisation

Babcock will conserve precious resources by using materials efficiently, specify and give preference to products that can be re-used and recycled and transition to re-cycled and renewable materials where possible.

Where feasible, suppliers are encouraged to:

- Employ closed loop waste systems, which utilise the waste product from one process or product in another product or process.
- Design, specify and procure materials, products and services, which minimise environmental impacts and adopt circular-economy principles.

### Packaging

Suppliers are required to take all reasonable steps to:

- Minimise waste, reduce packaging, give preference to materials and products with the greatest reused or recycled content, and provide documented evidence to Babcock.
- Eliminate the use of single-use plastic packaging. Suppliers using high amounts of single use plastic packaging are required to provide a timed plan to reduce usage.
- Enable the use of take back and collection services for their materials and associated packaging for subsequent reuse, recycling or recovery where feasible.
- Suppliers may be required to take back any packaging deemed excess or non-compliant at their own expense.

UK requirement: UK businesses and suppliers are subject to the UK Plastic Packaging Tax from April 2022. This will apply to all plastic packaging manufactured in or imported to the UK that does not contain at least 30% recycled plastic.

# Responsible materials

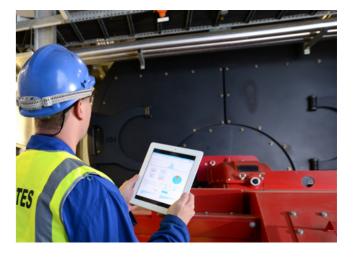
Babcock aims to:

- a. Identify and utilise safer materials (that are not harmful to health in manufacture, use or disposal) in products and processes where practical.
- Identify assure and manage security of supply for rare earth and conflict minerals and metals.
- c. **Responsibly source** products and materials ethically through credible standards where available.

#### a. Safer materials

Babcock expects suppliers to:

- Comply with relevant current (and future) legislation such as CoSHH, UK REACH, Australian Hazardous Substances Regulation or RoHS where appropriate.
- hazardous to health and the environment, and to substitute these with healthier alternatives where feasible. This may include limiting volatile organic compounds (VOCs) and materials such as heavy metals (cadmium, hexavalent chromium lead and mercury).
- Adhere to our Material list requirements outlined in Annex A. This Annex contains a 'Red' list of materials, which should not be used, and a 'Grey' list of materials that should be avoided or minimised where feasible alternatives are available.



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#### b. Rare earth and conflict minerals

Suppliers are required to:

- › Minimise the use of scarce minerals and conflict minerals wherever possible
- Advise Babcock if products supplied contain any of the following conflict minerals that may originate from Conflict Affected and High Risk Areas (CAHRA's):

Mineral	Designation	Issue
Tin	Conflict mineral	Minerals mined in conditions of armed conflict, sold or traded by armed groups, and are linked to serious human
Tantalum		rights abuses. Democratic Republic of Congo (DRC) and ni
Tungsten		adjoining countries are most closely associated with supply of conflict minerals but the EU list of CAHRA's extends this
Gold		list. Artisanal and small-scale mining sites are the most a
Cobalt	mineral- increasing demanded to support emerging green	DRC has the world's largest reserves of cobalt at almost 3 x greater than Australia (second highest)
Rare earths		China has the largest reserves of rare earth and dominates global supply impacting western supply chain resilience. Whilst it is not a CAHRA, local protest is linked to pollution and land contamination in production

- > Support any enhanced due diligence requirements to identify high risk supply chains which may be triggered by use of these minerals such as:
  - > Undertaking pro-active due diligence of mineral sources aligned with Organisation for Economic Co-Operation and Development (OECD) guidance.
  - Adopting the <u>Responsible Mineral Initiative's Conflict Mineral Reporting Template</u> throughout the extended supply chain to identify conflict minerals sourcing practices and associated smelters and refiners.
  - > Ensuring smelters and refiners are independently audited when sourcing/manufacturing products containing conflict minerals from CAHRA's.

Babcock will engage constructively with suppliers to support industry traceability systems to promote greater transparency and ensure that we jointly avoid contributing to conflict, serious human rights impacts and financial crime through any upstream sourcing activities.

#### c) Responsible sourcing

Suppliers are required to:

- > Source products and materials responsibly taking into account the environmental and social impacts.
- > Source materials or manufacture products that are compliant with credible responsible sourcing standards relevant to the goods/services supplied (if available).
- All timber products including packaging should be certified under the <u>Forest Stewardship Council (FSC)</u> or <u>Programme for the Endorsement of Forest Certification (PEFC) Schemes.</u>

UK requirement: Preference will be given to construction materials/products with BES6001, or for metals with appropriate certifications such as the Aluminium Stewardship Initiative Chain of Custody certification, the Copper Mark or ResponsibleSteel certification.





Babcock aspires to be a good neighbour and to make a positive difference for the communities in which we operate. We will work collaboratively with our customers and our supply chain to enhance development, inspire the next generation and reduce inequality throughout our business and value chain. Suppliers are encouraged to promote social value creation, support relevant national programmes and social causes such as the South African Black Economic Empowerment integration programme, the <a href="https://www.uks.com/w

### Developing skills and talent

Babcock are committed to creating fair opportunities across society and within our business to promote social mobility and help address diversity disparity by providing enrichment experiences, removing barriers and enabling employment for individuals from disadvantaged backgrounds and communities. We encourage suppliers to support our efforts by recruiting in their local community and by providing work experience, school outreach programmes, opportunities for apprentices, graduates, and people with disabilities, the armed forces and those returning to the workplace.

Suppliers are requested to:

Provide details to Babcock of programmes and policies in place to promote local employment, including graduate/Co-op, apprenticeship, STEM and work experience programmes. Babcock is particularly interested in creating opportunities for economically inactive, disadvantaged groups or individuals such as NEETS (not in education, employment or training), workplace returners, veterans, people from indigenous, black, Asian and minority ethnic backgrounds and those with disabilities.



UK requirement: Suppliers are encouraged and may be required to sign up to the 5% Club as a demonstration of commitment to work toward having a minimum 5% of your workforce enrolled on formalised apprentice, sponsored student, work experience or graduate development schemes within five years.

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### Wellbeing

Ensuring our culture, working environment and health services support staff wellbeing remains a priority. Babcock continue to improve mental health service provision building an inclusive and supportive workplace to remove any stigmas and discrimination associated with mental health.

Babcock will develop relationships with suppliers who share these values and invest in the wellbeing of the workforce including both physical and mental health. As such, we encourage suppliers to:

Report publically on the health and wellbeing of staff with clear processes for acting on issues identified.

- › Prioritise mental health at work and show commitment by pledging support to a public standard such as:
  - › UK: Mental Health at Work Commitment
  - > Canada: The National Standard of Canada for Psychological Health and Safety in the Workplace

### Community engagement

Our engagement approach aims to ensure we support the communities in which we work, that we are a good neighbour and we contribute positively to society. Suppliers are encouraged to:

- Actively and positively engage with their local community.
- > Support Babcock's community engagement efforts if working on sites for extended periods.
- Minimise disruption to the local community, particularly in regards to noise, emissions and local congestion when travelling to and working on Babcock sites.
- Adopt sustainable transport options when commuting to Babcock sites.

# Workforce diversity

Babcock is committed to building an inclusive and diverse organisation that more accurately represents the communities and countries in which we operate. Our vision for Babcock and our supply chain is that people can bring their whole selves to work and feel proud to be part of an enterprise where everyone feels respected, included and supported. We are also committed to school outreach activities which aim to inspire more young people into STEM qualifications, improving diversity in engineering disciplines and ultimately of our workforce.

We will work with suppliers who share these values and actively promote a diverse and inclusive workforce and reduce barriers to entry for under-represented groups.

Suppliers are required to:

Have in place and keep updated an appropriate Diversity & Inclusion Policy, which reflects and compliments the relevant statutory provisions relating to diversity and equality law in relation to race, age, sex, gender reassignment, marriage and civil partnership, disability, sexual orientation, religion or belief, pregnancy, maternity or otherwise. This should include details of their approach to monitoring, recruitment, bullying and harassment and training.

Suppliers may be required to:

- Provide data on the diversity of their workforce by the following characteristics: national identity, age, disability, ethnicity, religion or belief, sex, sexual orientation and postcode of residence. Requirements will differ in accordance with regional regulations, goals and certifications such as PAR certification in Canada.
- Provide data on the diversity of all applicants to vacancies at each stage of the recruitment process (including analysis at application, interview and hire) by the following characteristics: national identity, age, disability, ethnicity, religion or belief, sex, sexual orientation and postcode of residence.



UK requirement: Babcock support military veterans and have signed The Armed Forces Covenant which is a promise to those who serve, or who have served, and their families to ensure that they are treated fairly and are not disadvantaged in their day to day lives as a result of their service. We encourage our suppliers to pledge support.





Babcock are committed to conducting business honestly, transparently and with integrity, this will ensure we uphold high ethical standards across the Group and support our long-term success. Infringements of the UK Bribery Act (2010) and equivalent legislations will not be tolerated in any part of the supply chain.

### Fair treatment

#### Payment Terms

Babcock is committed to improving our supplier payment practices. This is demonstrated by our commitment to the Prompt Payment Code for our UK business. Suppliers are expected to:

 Pay their suppliers on time and in accordance with any contractual flow downs.

UK requirement: Suppliers are encouraged to adopt the Prompt Payment Code and promote adoption of the code throughout their own supply chains

#### Complaints and disputes

Suppliers are expected to have:

- Clearly communicated escalation channels for complaints and disputes arising in their supply chain
- Confidential grievance/remedy and appeal procedures in place that are communicated to the supply chain. (Note that our equivalent procedures are outlined in our Supplier Code of Conduct)

#### **Employment practices**

As stated in our Code of Conduct suppliers and their extended supply chains must ensure:

- Employment is freely chosen by all employees.
- Workers are free to join a Trade Union or collective agreement where applicable.

- Reasonable working hours are maintained (in line with local and national laws and regulations), overtime work is voluntary and all workers are entitled to at least one working day off in every seven-day period.
- No underage workers are employed either directly or indirectly.
- Stable employment is provided avoiding in appropriate use of zero hours contracts, umbrella employment firms or on a false selfemployment basis.
- Workers are paid fair wages, which at least meet national legal standards without unlawful or unethical deduction of wages.
   We encourage suppliers to pay workers a proper living wage.



### Ethical sourcing

The Babcock <u>Supplier Code of Conduct</u> is aligned with the United Nations Universal Declaration of Human Rights and the standards established by the International Labour Organisation. Our suppliers and their extended supply chain are required to share our commitment to respecting, protecting and promoting human rights and support our efforts to achieve transparency for higher risk supply chains and take responsibility for the issues we uncover. To achieve this suppliers are expected to:

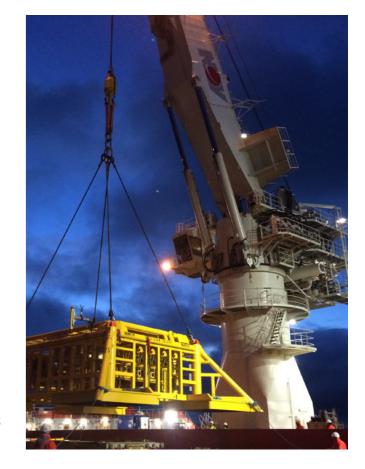
- Adopt a pro-active, risk-based approach to identifying any hidden labour exploitation in the upstream supply chain.
- Maintain records to trace the supply chain of all goods and services provided to Babcock.
- Implement regular supplier and sub-contractor audits of all high-risk products, materials or services, either directly or through a third party to monitor performance.
- Inform us immediately if there is any instance or suspicion of modern slavery, child labour or other forms of labour exploitation taking place in the supply chain or any part of its business.
- Provide a copy of your Modern Slavery Statement or other document detailing the steps being taken to ensure that modern slavery and labour exploitation does not occur in their own business or supply chain.
- Raise awareness of modern slavery to employees through appropriate means.
- Suppliers are required to notify any national referral mechanisms as soon as it becomes aware of any instance of modern slavery or labour exploitation taking place in its supply chains or business. For example in the UK the National Referral Mechanism helpline number is 0800 0121 700 and website to report incidences is www.modernslaveryhelpline.org/report.

If requested suppliers of products & materials are required to provide:

Details of the percentage of products / materials by value sourced / manufactured / produced for Babcock from high risk countries of origin as defined by the Global Slavery Index 2018. Any sourcing from China's Xinjiang Uyghur Autonomous Region (Xinjiang) must also be declared. Or as a minimum provide details of the percentage of products / materials by value, sourced, manufactured or produced from high risk countries of origin as defined by the Global Slavery Index 2018.

- In such instances we may require evidence that supply chain audits have been conducted either directly or through third party auditors for all goods supplied from the highest risk countries. Evidence includes:
  - Summary of audits or other activity by you or a third party to assess labour standards
  - Sample or other evidence confirming that action is taken to address issues highlighted by the audit

According to the <u>Global Slavery Index 2018</u> highest risk countries include: Pakistan, Afghanistan, North Korea, Iran, Democratic Republic of the Congo, Eritrea, Burundi, the Central African Republic, Chad, Mauritania, Sudan, South Sudan, Somalia, Syria, Yemen, Myanmar, Cambodia, Belarus.





### Supply chain development and innovation

Engaging with and developing new and existing suppliers is key to driving innovation, enhancing productivity and increasing quality, all of which are critical to achieving our growth ambitions. This means reducing barriers to entry for new and smaller players, investing in supplier relationship management activities and better harnessing our suppliers' expertise. Our goal is to be a 'customer of choice'; underpinned by collaborative working relationships to enable earlier supplier engagement and supplier led innovation.

We are striving to create the right conditions to allow our supply chain to flourish and aim to work

with suppliers who enable innovation and support development in upstream supply chains and reduce barriers for new entrants.

All suppliers are invited to approach Babcock with product & service innovation that could support us and/or our customers to improve health and safety, support our sustainability ambitions, improve customer delivery or reduce cost.

Suggestions should be submitted to the Babcock account lead who will engage with the local engineering and innovation teams where appropriate.

# Supplier diversity

Babcock recognises the value that small and mid-sized businesses (SME's/SMB's) play in the wider economy and we actively encourage them to engage with us. We will continue to engage with both smaller and local suppliers especially those that help inclusion of under-represented groups, which further contributes, to economic prosperity and societal integration.

Suppliers not classified as 'Small' or 'Mid'-Sized Enterprises /Businesses (SME's and SMB's) are encouraged to engage with suppliers that help promote inclusion of under-represented and may be required to:

- Provide details of attributable spend with SME's/SMB's for Babcock contracts.
- Report on attributable spend with diverse and minority suppliers such as indigenous,
   Voluntary, Community, Social Enterprises (VCSE's), black or ethnic minority owned/led businesses and women owned or led businesses.

Canadian requirement: Suppliers are also requested to provide data on activities that support regional Babcock or customer social value programs including:

- Membership of the Canadian Council for Aboriginal Business' Progressive Aboriginal Relations Program whose mission is to "foster sustainable business relations between First Nations, Inuit and Métis people and Canadian Business"
- Report attributable spend with <u>Women's Business Enterprise</u>-WBE certified suppliers

### Annex A: Material List

#### Red list of materials: **Do Not Use**

The following shall not be used in the delivery of any Babcock goods, works or services:

- Alkylphenols
- > Asbestos
- > Chlorofluorocarbons (CFCs)
- Formaldehyde (added) The requirement is to eliminate the formaldehyde content in bound boards and products used in internal fit-out and structures.
- Hydrochlorofluorocarbons (HCFCs)

- > Polychlorinated Biphenyls (PCBs)
- > Short Chain Chlorinated Paraffins
- Wood treatments containing creosote, arsenic or pentachlorophenol
- → Non- FSC or PEFC Timber
- UK: Any substance or material containing a substance that under the UK REACH regulations has had a Sunset Date applied

#### Grey list of materials: Avoid or minimise use

The following are materials that Babcock seeks to avoid using, or to minimise use if no suitable alternative is available:

- Chromium VI including metal products manufactured with Chromium (VI) pretreatment
- High VOC paints and where possible water based paints used as a replacement
- Adhesives containing Di-Isocyanates or isocyanates
- Any material containing a substance of very high concern
- → Bisphenol A (BPA)
- > Cadmium
- Chlorinated polyethylene
- Chlorosulfonated polyethlene (CSPE)
- › Chlorobenzene
- Chloroprene (neoprene)
- Chlorinated Polyvinyl Chloride (CPVC)
- Halogenated flame retardants (HFRs)
- › Lead

- → Mercury
- Perfluorinated Compounds (PFCs)
- > Polyvinylidene Chloride (PVDC)
- Hydrofluorocarbons (HFC's)
- > Aldrin
- > Chlordane
- p,p'-Dichlorodiphenyltrichloroethane (DDT)
- > Phthalates
- › Dieldrin
- requirement is to maximise the use of cement replacement products in concrete mixes and to maximise the use of Recycled Concrete Aggregate (RCA).
- Hazardous Chemicals The requirement is to eliminate the use of hazardous chemicals covered by the Stockholm and OSPAR Conventions, whilst ensuring management in line with the regional chemicals regulations

### **Useful Links**

- Supply Chain Sustainability School is for everybody working in the Construction, FM, Homes and Infrastructure sectors, providing training on sustainability including Waste & Carbon, Fairness Inclusion and Respect and The Modern Slavery Act: <a href="https://www.supplychainschool.co.uk">https://www.supplychainschool.co.uk</a>
- United Nations Global Compact: Guide to Corporate Sustainability: https://www.unglobalcompact.org/library/1151
- > SME Climate Hub: The SME Climate Hub has partnered with Oxford University to support small businesses in reducing their carbon emissions. The tools and resources can help all SMEs take concrete steps towards climate action: https://businessclimatehub.org/tools/
- University of Cambridge Institute for Sustainability Leadership-Targeting Net Zero: A strategic framework for business action https://www.cisl.cam.ac.uk/system/files/documents/net-zero-a-strategic-framework-for-business-action.pdf
- Greenhouse Gas Protocol Corporate Value Chain (Scope 3 Standard) <a href="https://ghgprotocol.org/standards/scope-3-standard">https://ghgprotocol.org/standards/scope-3-standard</a>
- Circular Economy: rethinking how we design, make, and use the things: How to build a circular economy | Ellen MacArthur Foundation.
   <a href="https://ellenmacarthurfoundation.org/">https://ellenmacarthurfoundation.org/</a>
- Responsible Minerals Initiative: provides companies with tools and resources to make sourcing decisions that improve regulatory compliance and support responsible sourcing of minerals from conflict-affected and high-risk area: <a href="https://www.responsiblemineralsinitiative.org">https://www.responsiblemineralsinitiative.org</a>
- The UK Government Social Value Model sets out measures to deliver value to society through public procurement. Businesses seeking to win government work must set out how they will deliver against 'selected' social value priorities. The intent is to promote new jobs and skills, encourage economic growth and prosperity; tackle climate change and level up the UK. Business must also demonstrate how they will influence their suppliers to deliver desired outcomes: <a href="https://www.gov.uk/government/publications/procurement-policy-note-0620-taking-account-of-social-value-in-the-award-of-central-government-contracts">https://www.gov.uk/government/publications/procurement-policy-note-0620-taking-account-of-social-value-in-the-award-of-central-government-contracts</a>

