

## Sustainable Procurement Policy

**Document Owner:** Adam Hepke / Sustainability Lead

**Approved By:** Neil Cusdin / Managing Director

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**Review Date:** 01/05/2027

### Purpose

This policy sets out the parameters for the sustainable procurement of goods, services and works across Breathe. The objective of the policy is to ensure that procurement activities deliver best value for the business whilst incorporating environmental, social and ethical considerations into all purchasing decisions.

Breathe is committed to undertaking procurement in a manner that minimises environmental impact, promotes responsible sourcing, supports ethical supply chains and contributes to the long-term sustainability objectives of the business.

### Scope

This policy applies to all non-payroll expenditure relating to the acquisition of goods, services and works across the business. It applies to all employees involved in supplier selection, purchasing, tendering, contract management or approval of expenditure.

This policy requires sustainability considerations to be incorporated at all stages of the procurement process, including supplier selection, quotation analysis, tender evaluation, contract award and contract review.

All purchases remain subject to this policy regardless of whether a formal procurement process is undertaken. Responsibility for compliance rests with the individual procuring the goods, services or works.

The splitting of purchase orders or expenditure to circumvent financial approval thresholds is prohibited and will be considered a breach of this policy.

### Sustainable Procurement Principles

Breathe will ensure that sustainability considerations are embedded within procurement decisions wherever reasonably practicable. Procurement decisions shall not be based solely on initial purchase price but shall consider the whole-life value and impact of the goods, services or works being procured.

When assessing procurement options, Breathe will seek to prioritise suppliers, products and services that demonstrate reduced environmental impact, responsible sourcing practices and alignment with the company's sustainability objectives.

Where operationally and commercially viable, preference will be given to suppliers who can demonstrate carbon reduction initiatives, sustainable material usage, ethical labour practices, and transparent environmental policies.

Breathe will seek to minimise waste through the prioritisation of durable, repairable, reusable and recyclable products, and by refurbishment or repair options before purchasing new equipment where appropriate.

Where possible, local or regional suppliers will be prioritised in order to reduce transport-related emissions and support local economic development.

All procurement processes shall be undertaken in a transparent, fair and proportionate manner, ensuring that sustainability, operational suitability, risk and commercial value are appropriately balanced.

### **System of Authority (SOA)**

To obtain goods and/or services, Breathe will comply with the following approval and procurement processes according to expenditure thresholds.

#### **Level 1 – Goods, Services or Works Value £0 – £2,500**

Purchases at this level require Director approval. A Purchase Order must be raised for all purchases exceeding £500. A minimum of two quotations should be obtained where practicable. A procurement risk management matrix is not required unless the purchase presents elevated operational, sustainability or reputational risk.

#### **Level 2 – Goods, Services or Works Value £2,500 – £10,000**

Purchases at this level require Director approval. A Purchase Order must be raised for all purchases exceeding £500. A minimum of two quotations must be obtained. A procurement risk management matrix must be completed.

#### **Level 3 – Goods, Services or Works Value £10,000 – £50,000**

Purchases at this level require Director approval. A Purchase Order must be raised for all purchases exceeding £500. A minimum of three quotations should be obtained through a closed tender process. A procurement risk management matrix must be completed.

#### **Level 4 – Goods, Services or Works Value Greater Than £50,000**

Purchases at this level require approval in accordance with the Live Nation System of Authority. A Purchase Order must be raised for all purchases exceeding £500. A minimum of three quotations must be obtained through an open tender process. A procurement risk management matrix must be completed.

### **Minimum Supplier Requirements**

All suppliers must meet the minimum due diligence requirements appropriate to the procurement value and risk profile.

Suppliers must be VAT registered where applicable and maintain Public Liability and Employers' Liability Insurance of no less than £5 million unless otherwise approved in writing by a Director.

Suppliers must provide evidence of their Health & Safety Policy, Equal Opportunities Policy, Modern Slavery Statement and any relevant statutory documentation where requested.

Suppliers must disclose any enforcement notices, regulatory sanctions or material legal proceedings relevant to their operations.

Suppliers must provide statutory accounts and/or financial information sufficient to assess financial stability where required.

Suppliers must provide Sustainability or Environmental Policies or Statements where applicable and be prepared to evidence the practical implementation of those commitments where requested.

### Risk Management Matrix

		Ability to meet criteria				
		Impossible	Unlikely	Possible	Likely	Certain
Impact of non-fulfilment of criteria	Catastrophic	1	2	3	4	5
	Major	2	4	6	8	10
	Moderate	3	6	9	12	15
	Minor	4	8	12	16	20
	Negligible	5	10	15	20	25

### Sustainable Supplier Assessment

Where procurement exceeds £2,500, or where a supplier presents elevated operational, sustainability, compliance or reputational risk, a Procurement Risk Management Matrix must be completed for each supplier under consideration.

The purpose of the matrix is to provide a structured and consistent assessment of supplier suitability by considering commercial, operational, environmental and ethical factors relevant to the procurement.

The matrix shall support procurement decisions by ensuring that supplier selection is based on a balanced assessment of value, risk and sustainability performance rather than price alone.

### Risk Management Considerations

Procurement decisions shall consider the operational, financial, compliance, environmental and reputational risks associated with the proposed supplier and procurement activity.

Consideration shall be given to the potential impact of supplier failure, non-compliance, environmental underperformance, service disruption or reputational harm.

Where risks are identified, appropriate mitigation measures should be implemented prior to contract award.

The matrix scoring table:

Impact of non-fulfilment of criteria	Definition	Level
<b>Catastrophic</b>	If the criteria were not fulfilled, it would have:	1
Catastrophic financial loss		
Catastrophic legislative non-compliance		
Catastrophic reputational damage		
<b>Major</b>	If the criteria were not fulfilled, it would have:	2
Major financial loss		
Major legislative non-compliance		
Major reputational damage		
<b>Moderate</b>	If the criteria were not fulfilled, it would have:	3
Moderate financial loss		
Moderate legislative non-compliance		
Moderate reputational damage		
<b>Minor</b>	If the criteria were not fulfilled, it would have:	4
Minor financial loss		
Minor legislative non-compliance		
Minor reputational damage		
<b>Negligible</b>	If the criteria were not fulfilled, it would have:	5
Negligible financial loss		
Negligible legislative non-compliance		
Negligible reputational damage		

### Matrix Key Criteria

The Procurement Risk Management Matrix shall assess suppliers against the following criteria:

#### 1. Cost and Whole-Life Value

Assessment shall consider not only the quoted purchase price but also installation, transport, operating costs, maintenance requirements, repairability, expected lifespan and disposal costs.

#### 2. Technical Suitability and Performance

Assessment shall consider whether the goods or services meet the technical specification, compatibility requirements and performance standards necessary for their intended operational use.

### **3. Availability and Lead Times**

Assessment shall consider the supplier's ability to deliver within required project timescales and maintain stock or service availability where ongoing support is required.

### **4. Supplier Reputation and Financial Stability**

Assessment shall consider the supplier's trading history, financial standing, references and reputation within the industry.

### **5. Sustainability Credentials**

Assessment shall consider the supplier's environmental policies, carbon reduction initiatives, sustainability certifications and demonstrable commitment to reducing environmental impact.

### **6. Product Lifecycle and Circularity**

Assessment shall consider the durability, repairability, upgradeability, serviceability and end-of-life recyclability or reuse potential of the product or service.

### **7. Geographic Efficiency and Logistics Impact**

Assessment shall consider the supplier's location, transport implications, logistical efficiency and associated environmental impact.

### **8. Compliance and Accreditation**

Assessment shall consider compliance with all relevant legislation, standards, insurances and industry accreditations.

### **9. Service and Aftercare Support**

Assessment shall consider warranty provisions, technical support, maintenance capability and responsiveness.

### **10. Innovation and Futureproofing**

Assessment shall consider the supplier's ability to provide scalable, adaptable and future-ready products or services.

### **11. Ethical and Social Responsibility**

Assessment shall consider labour practices, modern slavery compliance, equality policies and broader ethical business conduct.

## Policy Review

This policy shall be reviewed at least annually to ensure continued relevance, effectiveness and alignment with legal requirements and Breathe's sustainability objectives.

Additional reviews may be undertaken where there are material changes to legislation, business operations, sustainability strategy or procurement practices.

## Legislative Context

All employees that are involved in the purchasing of goods, services or works must comply with all relevant and applicable legislation. These include but are not limited to:

Sale of Goods Act 1979 as amended by the Sale and Supply of Goods Act 1994

<https://www.legislation.gov.uk/ukpga/1979/54>

Modern Slavery Act

<http://www.legislation.gov.uk/ukpga/2015/30/contents>

Bribery Act 2010

<http://www.legislation.gov.uk/ukpga/2010/23/contents>

Equality Act 2010

<http://www.legislation.gov.uk/ukpga/2010/15/notes/contents>

Criminal Finance Act 2017


<http://www.legislation.gov.uk/ukpga/2017/22/contents/enacted>

## Approval

Signed for and on behalf of **Breathe**

Name: Neil Cusdin

Position: Director

Signature: 

Date: 21/05/2026






# Sustainable Procurement Policy

Final Audit Report

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