

# Swift Group Limited

## Responsible Procurement Policy

### The Swift Group

The Swift Group manufactures; Touring Caravans, Motorhomes, Camper Vans, Holiday Homes and Park Home Lodges at their manufacturing site in East Yorkshire, England. In addition, Swift also operates a busy Motorhome hire business called Swift Go from multiple locations around the UK.

As one of the largest manufacturer of leisure vehicles in Europe we operate with a large and complex Supply Chain for goods and services. The company's procurement policies support the needs of a modern and efficient factory requiring frequent, on-time and in-full deliveries of quality raw materials, sub-assemblies and component parts for the high volume manufacture of leisure vehicles and homes.

Our supply chain partners provide an array of components, delivered in efficient batch quantity sizes, to set delivery timeslots to meet the demands of our eight individual assembly lines.

Delivered production parts are not warehoused, but delivered in sequence direct to the assembly halls lineside to minimise stock levels on site.

Swift also manage a large supply chain of aftercare parts to support our existing customer's products which are distributed to and supplied through our large dealer network.

### Responsibilities

The Swift Group understand and recognise that its supply chain activities have wider; social, economic and environmental impacts, as such these responsibilities are managed carefully through the procurement strategy.

### Social and Economic Responsibilities

The Swift Group has policies and procedures in place to ensure that all business activities align with its responsibilities to its employees, the local community and society.

- **Health and Safety:** Swift has a duty of care toward the wellbeing of its employees, contractors and visitors within the business. Extensive policies and procedures exist, which are measured, reviewed and updated regularly to ensure all employees, contractors and visitors feel safe and cared for whilst working on or visiting our manufacturing site.
- **Employees Wellbeing:** It is important that all employees feel valued and cared for by the company. As such we promote a set of core values which enables employees to follow positive guiding principles with aligned behaviours, to foster a safe and engaging environment. These values are pertinent to the organisation and focus on Energy, Professionalism, Innovation and Community.

Swift ensure that each employee receives the appropriate level of training and support for their specific role, from their initial induction into the business and throughout their career

with the company. Ongoing training and development programmes are run through the Swift Group onsite training academy.

Swift ensure all employees receive a contract of employment when they first join the company and that pay levels are regularly reviewed to ensure they remain fair and competitive. We have systems in place that monitor every employees working hours to ensure they are not excessive and comply with the Working Time Regulations.

The company offers a wide variety of subsidised social activities outside of work to support our employee's mental health and wellbeing as well as team building and social interaction. We have trained on site Mental Health First Aiders and access to a support network of external professionals should any employee require them.

- **Equality, Diversity and Respect:** The Company takes equality, diversity and respect very seriously. We oppose all unlawful discrimination under the Equality Act 2010 on the grounds of; age, gender reassignment, disability, marriage or civil partnership, pregnancy or maternity, ethnicity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex or gender, sexual orientation.
- **Modern Slavery and Human Trafficking:** We fully support the Modern Slavery and Human Trafficking Act 2015 by ensuring no forms of modern slavery, servitude, forced or compulsory labour and human trafficking exist either with the company or within its supply chain. We conduct regular risk analysis of our supplier chain and preform supplier audits as part of our ongoing supply chain due diligence process.
- **Whistleblowing** the business is committed to ensuring the company operates in a legal and ethical manner at all times, we encourage a culture of openness and transparency where employees can feel safe, protected and supported at work. Employees are able to raise serious concerns of wrong doings or malpractice without fear of reprisal or recrimination.
- **Data Protection:** We ensure personal data is protected securely and have appropriate GDPR processes and agreements in place with relevant suppliers.

### Supply Chain Responsibilities

Our procurement policies ensure we meet the needs of the organisation for the supply of goods and services, they also ensure we consider and address our wider; Social, Economic and Environmental needs in the decisions and actions we take.

We are committed to an ongoing process of policy review and improvement within our supply chain.

Within our supply chain the decisions on; 'what we buy' and 'where we buy from' are taken very seriously. A number of key factors are taken into consideration before any new supplier is appointed. These include;

- **Standards:** We encourage strong, healthy, long-term supplier relationships. We treat all our suppliers fairly and set high standards on ourselves and our supply chain, which we expect suppliers to achieve and uphold. Swift uses a Q100 supplier measure rating based on delivery and quality performance, data is published and reviewed with each supplier.

We operate with single, dual and multiple sources for similar/same commodities dependent on the commodity and the specific supply chain resilience. We support and encourage local suppliers who will benefit the local economy and support community job creation opportunities.

We audit all new and prospective suppliers to ensure they can provide evidence of satisfactory working standards and procedures and financial stability. We will work with any supplier who suffers poor performance issues to support them back to achieving the required performance levels as quickly as possible. We discourage non-negotiable resolutions.

We protect and respect all confidential information entrusted with us. We ensure all relevant employees are aware of our Responsible Procurement Policy. We encourage and prioritise suppliers who communicate well and are flexible and forward thinking.

Swift does not trade in areas of conflict or human rights abuse.

- **Compliance:** as a responsible employer and manufacturer we comply with all relevant laws and regulations relating to our supply chain including; regulatory compliance, taxation, dealing with confidential information, money laundering, gifts and donations and competition law, etc.

In certain commodity types we conduct specific audits of suppliers as part of the companies due diligence process to maintain standards and ensure ongoing regulatory compliance. We are in the process of appointing a Compliance Officer to uphold standards.

- **Environmental:** We recognise our responsibilities and the importance of protecting our planet and its natural resources for future generations. We seek to work collaboratively with our suppliers and partners to improve the environmental impacts of our products and processes. As such;
  - We operate within modern purpose built factories, which are designed to be clean and efficient to operate. We invest heavily in modern energy efficient plant equipment and machinery minimising; air and noise pollution ensuring we remain within national defined limits.
  - We manufacture components with sophisticated software programs linked to modern machinery which both optimise and minimise waste on cut sheet materials.
  - We encourage the use of recycled plastic materials and discourage the use of single use plastics wherever possible. We separate and recycle waste materials where possible.
  - We ensure all timber based products are from sustainably managed and legally controlled sources which meet the UK Timber Regulations (UKTR). As members of the Timber Trade Federation our team are trained to conduct due diligence on our timber trade suppliers to ensure compliance with the appropriate licences and certifications in place.
  - We carefully manage and schedule deliveries to minimise transport and wasted journey times and ensure our deliveries are as efficient as possible.
  - We ensure all chemicals used onsite have up to date Material Safety Data Sheets (MSDS) logged and recorded digitally. Chemical risks and hazards are understood and linked to internal working processes with appropriate PPE defined for each operation.

- **Transport:** Moving goods, (transport, shipping and freight movement) is a big part of our logistics function, which is essential to what we do. Where we can we encourage full delivery loads and fewer deliveries. Shared deliveries from separate companies are considered to optimise vehicles loads where possible. The use of local/national suppliers and hubs is encouraged to minimise overseas freight and its environmental impacts. We discourage air freight shipments.

Our own transport vehicle fleet are maintained to a high standard and meet the latest emissions standards. Company vehicles are in the process of transitioning from petrol and diesel powertrains to hybrid and full Battery Electric Vehicles.

To minimise overseas travel impacts we encourage video conference meetings with suppliers wherever possible to avoid travel by land, sea or air. Our Procurement teams now operate hybrid working practices to reduce the impacts of travel to and from work. The company also supports cycle to work schemes for all employees.

- **Packaging and Waste:** We recognise the impact that packaging can have on the environment and discourage all single use plastic and non-recyclable packaging. We have over many years achieved high levels of Returnable Packaging (RTP) arrangements with our supply chain. We encourage the 'Reduce', 'Reuse', 'Recycle' ethos to minimise waste, recycle materials and reduce landfill wherever possible. As a business we separate and recycle waste where practical. We record and monitor all levels of waste generated by the business and ensure waste is disposed of safely and responsibly.
- **Continuous Improvement:** We are committed to regular ongoing reviews of our products and process to identify areas for improvement and advancement. We actively encourage best practice.
- **Agreements:** Detailed fixed term 'Contracts of Supply' agreements are in place with key suppliers and partners. For one off and lower spend supplier accounts we refer to our concise set of Terms and Conditions (T&C's) for the supply of goods and services are published on our website.

Swift pays its supplier base promptly and on time and in line with pre agreed payment terms.

- **Innovation:** Swift are committed to continuously developing new innovative products for market. To support this we need innovative thinking suppliers who are prepared to work with us to collaborate on innovation. As such we actively seek and encourage through long term Contact of Supply agreements forward thinking innovative supplier partners who share our visions and goals.