Newgrove Limited

Procurement Policy

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Newgrove Limited. Company No: 02775618, VAT No: GB 666 2978 82
Registered at Cardiff. Registered Office: 4th Floor, One Kingdom Street, Paddington Central, London W2 6BD
POL-013 Procurement Policy V2.0 – Client-shareable

Version History

Version	Date	Author	Change	Approved by
1.0	November 2019		Original issue; approved as issued	
2.0	2026-10-18	Information Security Team	Full refresh of the November 2019 policy; changes recorded in the policy's change log	Chief Technical Officer

Document Control

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Approved by:	Chief Technical Officer
Approval date:	2026-10-18
Effective date:	2026-10-18
Next review date:	2027-09-30
Owner:	Chief Executive Officer
Scope:	The policy covers all purchases of goods and services, including:
Review and consultation process:	Drafted or reviewed by the Information Security Team and approved by the Chief Technical Officer (PRC-001). Full review each September and an interim check each March, and after any decision, incident, legal change, client requirement or audit finding that affects it.
Distribution methods:	The controlled master is held in the compliance repository (git) maintained by the Information Security Team, with the approved text tagged by version. Released copies are published to SharePoint. Staff and clients receive exported PDF/DOCX copies of approved documents only; clients receive only documents classified public or client-shareable (PRC-001).
Associated documentation:	POL-001 Information Security Policy POL-004 Data Protection Policy POL-011 Anti-Bribery and Corruption Policy POL-015 Environmental Policy POL-012 Modern Slavery Policy PRC-011 Supplier and Sub-processor Management
Supersedes:	SRC-0009 Newgrove - Procurement Policy November 2019 (Word)
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1. Purpose

Newgrove buys goods and services that meet its business needs and give good value. It also takes account of security, data protection and ethical, social and environmental impact. This policy sets the principles for buying, and the standards Newgrove expects of its suppliers.

2. Scope

The policy covers all purchases of goods and services, including:

- cloud and software services
- equipment
- contractors and consultants
- professional services

Suppliers that will have access to Newgrove's or its clients' data or systems are also covered by the security and data protection due diligence in the Supplier and Sub-processor Management procedure.

3. Policy statements

How Newgrove buys

3.1 Suppliers are chosen on objective criteria: fitness for purpose, value for money, reliability, and security, ethical, social and environmental performance.

3.2 Before a supplier gets access to Newgrove or client data or systems, its security is assessed and a suitable contract is in place. Where the supplier processes personal data, that includes data processing terms meeting Article 28 UK GDPR. The supplier is then recorded in the supplier register (Information Security Policy §5.26; Data Protection Policy §11; Supplier and Sub-processor Management procedure). Where a client contract requires the client's consent to a subcontractor or sub-processor, that consent is obtained first.

3.3 Purchases are authorised by the Chief Executive Officer, who may delegate authority in writing. Payments above £2,500 are set up by one person and approved by a second (dual control), as declared to the insurer.

3.4 Anyone involved in a purchase who has a conflict of interest declares it (Anti-Bribery and Corruption Policy 3.13). Gifts and hospitality from suppliers follow the Anti-Bribery and Corruption Policy.

3.5 Newgrove keeps supplier information confidential, and pays suppliers on the agreed terms.

Supplier review

3.6 Suppliers with access to data or systems, and other key suppliers, are reviewed at least annually (Supplier and Sub-processor Management procedure). The review covers security and data protection, and asks about environmental, social and ethical performance where relevant.

3.7 Where a supplier falls short, Newgrove works with it to improve. Newgrove stops using a supplier that persistently disregards these standards.

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What Newgrove expects of suppliers

3.8 Suppliers are expected to:

- comply with the law in the countries where they operate
- respect the ILO Declaration on Fundamental Principles and Rights at Work (as amended in 2022): freedom of association and collective bargaining; no forced, bonded, trafficked or child labour (Modern Slavery Policy); no discrimination; and a safe and healthy working environment
- pay fairly, keep working hours reasonable, give clear written terms, and treat workers without harassment or abuse
- not tolerate bribery, corruption, fraud, money laundering or conflicts of interest (Anti-Bribery and Corruption Policy)
- protect personal and business information, and meet the security and data protection terms of their contract
- manage their environmental impact and seek to reduce it (Environmental Policy)
- pass these expectations on to their own suppliers where relevant

4. Roles and responsibilities

Role	Responsibility
Chief Executive Officer	Owns this policy. Authorises purchases, or delegates authority in writing. Signs contracts and obtains client consent where needed
Chief Technical Officer	Assesses and approves suppliers with data access (Information Security Policy §5.26; Supplier and Sub-processor Management procedure)
Information Security Team	Keeps the supplier register and runs the annual review (Supplier and Sub-processor Management procedure)
Everyone who buys	Follows this policy and declares conflicts

5. Compliance, monitoring and exceptions

- **Exceptions.** Any exception, such as an urgent purchase without the usual checks, needs the Chief Executive Officer's approval and is recorded with the reason.
- **Review.** Reviewed in full each September, with an interim check each March.

6. Related documents

- Supplier and Sub-processor Management; supplier register
- Information Security Policy §5.26; Data Protection Policy §11
- Anti-Bribery and Corruption Policy; Environmental Policy; Modern Slavery Policy

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