

	POLICY	
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PROCUREMENT POLICY

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1. POLICY OBJECTIVES

1.1. The objectives of the Procurement Policy are:

- 1.1.1. to set guidelines for an efficient and transparent procurement process;
- 1.1.2. to define common selection criteria for suppliers;
- 1.1.3. to set common requirements for the employees responsible for the procurement at DelfinGroup;
- 1.1.4. to ensure rational procurement controls;

1.2. Procurement policy and procedure is an integral part of DelfinGroup procurement decision-making, at all levels of DelfinGroup management.

2. PROCUREMENT MANAGEMENT PRINCIPLES AND CRITERIA FOR SUPPLIER SELECTION

2.1. DelfinGroup ensures equal treatment of each tenderer and tender.

2.2. DelfinGroup sets clear and comparable criteria for evaluating procurement.

2.3. By setting requirements for tenderers and procurement, DelfinGroup promotes competition between market players.

2.4. DelfinGroup ensures confidentiality in the procurement process, avoiding manipulation that could lead to unfair competition or disclosure of business secrets of the tenderer.

2.5. DelfinGroup does not cooperate or discontinues cooperation with suppliers whose practices are not in line with the values and standards that DelfinGroup upholds, or whose actions/inactions may cause damage to the reputation of DelfinGroup.

2.6. DelfinGroup's procurement practices are based on minimising negative environmental impacts, using innovative solutions to save resources and maintain sustainability.

2.7. DelfinGroup has implemented and maintains an integrated management system in accordance with international standards ISO 9001:2015 and ISO 50001:2018, ensuring the application of the requirements of these standards in procurement management.

2.8. When selecting tenderers, DelfinGroup assesses them against common criteria, setting appropriate requirements for:

- 2.8.1. reputation;
- 2.8.2. competences;
- 2.8.3. capacity;
- 2.8.4. financial stability;
- 2.8.5. in certain procurements to energy efficiency and environmental protection measures.

3. ACCOUNTABILITY AND CONTROL OF PROCUREMENT

3.1. Employees responsible for the procurement must comply with unified requirements:

- 3.1.1. to be independent in their decisions, respecting the principles set out in the policy and the procurement procedure;
- 3.1.2. to improve their professional competence, consult colleagues and, where appropriate, experts in the field, to prevent subjective influence on their decision-making;

- 3.1.3. to report to the line manager, or as defined in the Whistleblowing Policy, any attempt to influence a decision unfairly or unethically or any conflict of interest.
- 3.2. Employees responsible for the procurement research market trends to ensure that procurement is cost-effective and makes the best use of resources.
- 3.3. Responsible person for procurement control:
 - 3.3.1. develops and updates procurement management documents;
 - 3.3.2. together with the employee responsible for procurement, ensures that the quality of cooperation with suppliers is assessed;
 - 3.3.3. audits expenditure;
 - 3.3.4. prepares and submits the Management Board a report on the expenditure audits carried out and the evaluation of cooperation with suppliers, in accordance with the order laid down in the procurement procedure.

4. RESPONSIBILITY OF MANAGEMENT BOARD

- 4.1. Develops a procurement policy and updates it as necessary, but at least every 3 years.
- 4.2. Approves the Procurement Procedure which, on the basis of this policy, defines the procurement process, the roles and responsibilities of the staff involved, and the mechanisms for controlling and monitoring the efficiency and effectiveness of the procurement process.
- 4.3. Appoints persons responsible for procurement, who are empowered to organise and decide on procurement in accordance with the procurement management procedure, ensuring compliance with the principles of this policy.
- 4.4. Appoints a person responsible for procurement control and reviews his/her competencies at least every 3 years.
- 4.5. Is responsible for ensuring that the principles set out in this policy are implemented and complied with by all Group companies.
- 4.6. The powers of the DelfinGroup Management Board in the procurement process are defined by the Articles of Association of DelfinGroup AS and the Rules of Procedure of the Management Board.

5. RESPONSIBILITY OF SUPERVISORY BOARD

- 5.1. Approves the Procurement Policy and its changes.
- 5.2. Assess the effectiveness of procurement management on the basis of internal audit reports.