



P O L I C Y 1 6 O F 1 6

Subcontractor & Supply Chain Policy

Real partnership. Real expertise.

Document reference	SOMA-POL-16
Version	2.0
Issue date	March 2026
Next review	March 2027
Policy owner	Adam O'Neill, Director
Approved by	Stevie MacGregor
Classification	Public — available on request

SOMA Project Controls Ltdwww.somaprojectcontrols.com

1. Purpose

This policy sets out how SOMA Project Controls Ltd selects, manages and works with associates, subcontractors and suppliers — ensuring that the quality, ethics and resilience of our supply chain match those of our own firm.

2. Scope

Applies to all third parties engaged by SOMA to deliver services, whether as professional associates, specialist subcontractors or commercial suppliers.

3. Principles

- Suppliers are an extension of SOMA — we are accountable to the client for their behaviour and delivery.
- Selection is on merit — capability, reliability, ethics and value — not on personal relationships alone.
- We treat suppliers the way we wish to be treated: clearly, fairly, and paid on time.
- Our standards on ethics, safety, data and sustainability flow down the chain.

4. Selection & Onboarding

1. Needs are defined in writing before any third party is approached.
2. Due diligence is proportionate to the risk and spend — always covering right-to-work, insurance, information security and ethics.
3. Higher-risk categories receive deeper checks, including modern-slavery indicators, financial stability and sub-supplier arrangements.
4. Written contracts are in place before work starts. Back-to-back terms with the client engagement are used where required.

5. Flow-Down Requirements

All subcontractors and associates are contractually required to comply with:

- Anti-Bribery & Corruption, Conflict of Interest and Modern Slavery commitments.
- Data Protection, Information Security and confidentiality requirements appropriate to the engagement.
- Health & Safety requirements, including any client-site-specific arrangements.
- Quality standards, including peer-review requirements for deliverables.

- Equality, Diversity & Inclusion and fair-work standards.

6. Performance & Relationships

- Supplier performance is reviewed on every engagement and recorded.
- Issues are raised early, directly and without blame.
- Valued suppliers are offered repeat work, longer-term framework arrangements and honest feedback.
- Suppliers are paid on agreed terms, typically within 30 days of a valid invoice, and in line with Prompt Payment Code principles.

7. Exit & Offboarding

When an engagement ends, we confirm the return or secure destruction of any SOMA or client information, settle outstanding invoices promptly and capture lessons learned. Ongoing confidentiality obligations survive termination.

8. Review & Governance

This policy is reviewed at least annually, and sooner if legislation, SOMA Project Controls Ltd's operating context or client requirements change materially. The Director is the accountable owner. Minor amendments are logged in the version-control table; material changes trigger a re-issue and fresh sign-off by the policy owner and approver named on the sign-off page.

S I G N E D & A P P R O V E D

Policy Adoption & Approval

This policy is formally adopted by SOMA Project Controls Ltd. It is communicated to all employees, associates and, where relevant, supply-chain partners, and is available on request to clients, prospective clients and other interested parties. The signatures below record its adoption and the date from which it takes effect.

P O L I C Y O W N E R

Adam O'Neill

Adam O'Neill

Director

SOMA Project Controls Ltd

Date: March 2026**A P P R O V E D B Y**

Stevie MacGregor

Stevie MacGregor

Director

SOMA Project Controls Ltd

Date: March 2026**N e x t s c h e d u l e d r e v i e w****March 2027**