



POLICY

SeeBeyondBorders Ireland

PROCUREMENT POLICY

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PROCUREMENT POLICY

1.DOCUMENT PURPOSE

This policy outlines SeeBeyondBorders' Ireland approach to procurement and the principles and values which are to be applied to the acquisition of goods and services. The principles governing procurement activities include -:

- Integrity – By obtaining competitive quotations and being accountable for an open, honest and fair procurement process.
- Efficiency – By promoting value for money and ensuring efficient use of SeeBeyondBorders resources.
- Compliance – By ensuring that our procurement activities are compliant with country laws that apply to counter terrorism and financial wrongdoing.
- Risk Mitigation – by ensuring that we recognise financial risks in procurement and take appropriate steps to mitigate such risks in line with our risk management policies.

This Policy is reflected and operationalised in SeeBeyondBorders Ireland Financial Procedures Manual (FPM) which is in progress.

2.DEFINITION

Procurement: The process of ensuring that the goods and services required for the efficient operation of SeeBeyondBorders Ireland are authorised, acquired at the best price, are of the required quality and are delivered at the right time.

Goods and Services: Any materials, products, equipment or services purchased for SeeBeyondBorders operations.

Assets: A physical item, with an expected useful life of at least one year and a purchase price of 300 EURO, or more, per item e.g. computers, motor bikes or office equipment.

2.1 Implementing the principles

The principles of procurement are implemented by using SeeBeyondBorders Ireland policies and processes. There are three key stages to procurement:

- | | | |
|-----------------------|----------------------------|-------------------|
| -Procurement Planning | - Defining the requirement | - Managing Order |
| -Internal discussion | - Quote/tender Process | - Delivery |
| | - Supplier Selection | - Receipt/invoice |
| | | - Payment |

3. POLICY

3.1 Geographical variations

This policy applies to SeeBeyondBorders Ireland and its oversight is the responsibility of the Board of SeeBeyondBorders Ireland. It aligns with the equivalent policies of the SeeBeyondBorders entities in the other geographic locations in which SeeBeyondBorders operates.

3.2 Authorisation Matrix

Approval for the purchase of all goods and services, including the signing of agreements which result in a commitment for future expenditure, are subject to the limits as specified in the SeeBeyondBorders Ireland Authorisation Matrix.

SeeBeyondBorders Ireland operates different limits for budgeted and unbudgeted expenditure.

3.3 Quotations Requirement

Individual Non Recurring Purchases less than 300 Euro do not require quotations. Such purchases shall be subject to expense claim or petty cash controls and approvals

Individual Non Recurring Purchases of more than 300 Euro and less than 1,000 Euro per item, will require at least two written (preferred) or documented verbal quotes.

Individual Purchases of 1,000 Euro per item, or more, will require at least three written quotes.

3.4 Activity/Programme Purchases

Staff (for the time being the Finance and Administration Coordinator) or the Chair of the Board may submit funding requests to the CEO SeeBeyondBorders Ireland.

Any request for one-off, unbudgeted expenditure must be sent to the CEO SBB Ireland for approval.

3.5 Asset Purchases

All Asset purchases must be approved prior to procurement.;

All asset purchases will require quotations, which are to be attached / documented.

Approval limits for Capital Expenditure are as per the Authorisation Matrix.

3.6 Ethical Purchasing, Conflict of Interest, Confidentiality, and Counter Terrorism Sanctions.

- Staff/personnel involved in procurement must comply in all respects with laws, ethics and standards of professional conduct, which apply to their purchasing activities. In general, SeeBeyondBorders Ireland staff/personnel shall work to maintain and enhance high levels of accountability through ethical conduct and conscientious adherence to ethical methods of doing business.
- SeeBeyondBorders Ireland staff/personnel may not select a supplier of goods or services for any reason other than its ability to fulfil the organisation's needs. They

may not personally accept any goods or services or other forms of compensation or favours from suppliers, contractors such as fees, commissions accept gifts, rewards or benefits or any form of bribes. All such decisions and actions are unacceptable and prohibited.

- SeeBeyondBorders Ireland staff/personnel must avoid any conflict of interest with suppliers. The procurement process must be transparent and have no actual or perceived appearance of impropriety.
- No SeeBeyondBorders Ireland staff/personnel is to take advantage of his/her position for private purposes, or solicit or accept gifts, rewards, or benefits that might compromise, or be seen to compromise their integrity.
- All prices and technical information submitted by suppliers are to be kept secure and strictly confidential. Information may be verbal (where allowed) or written, including email. It is a responsibility to ensure that adequate measures have been taken to assure that confidentiality is maintained.
- SeeBeyondBorders Ireland staff/personnel involved in the procurement process must understand the purpose of standard procurement procedures as well as the policies that support these procedures in order to provide a foundation for completed and consistent consideration of all aspects of the purchasing cycle.
- SeeBeyondBorders Ireland Board operates in accordance with the Charities Regulator Guidance on Money Laundering and Counter-Terrorist Financing for Charities. SeeBeyondBorders Ireland has also established a “Beneficial Ownership Register” and has filed its beneficial ownership information with the Central Register of Beneficial Ownership in the Companies Registration Office.
- There must be a segregation of duties so that staff purchasing goods and services are not also the approver of such purchases.

3.7 Contractors and Consultants

SeeBeyondBorders Ireland may engage building contractors or consultants as part of the program or organisation’s requirements.

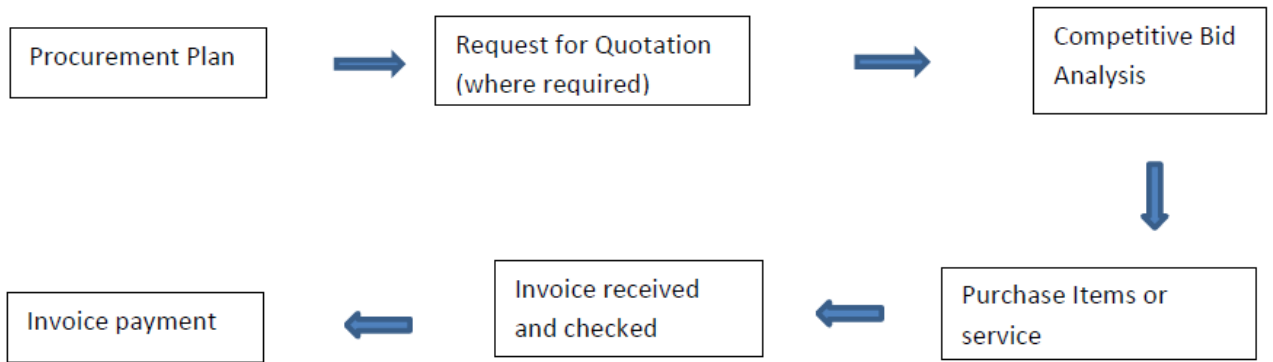
All engagements of contractors or consultants, over 300 Euro, will require quotations as per 3.3 above. A written agreement must be signed between the successful supplier and SeeBeyondBorders Ireland. In situations where the contracting supplier is planning to use a subcontractor, this information must form part of the written agreement. It is expected that all subcontractors will also be provided with and adhere to this policy.

Planned engagement of contractors, or consultants, must be included within the Funding Request and / or the Activity Proposal Form, as appropriate.

3.8 Exception

Where there is only one supplier of any good or service that is reasonably available, approving staff must be satisfied that all avenues have been explored, that they have negotiated a fair price and that SeeBeyondBorders Ireland receives value for money. Any such purchases shall be approved by the SeeBeyondBorders Ireland CEO , in writing.

3.9 Procurement Process



4. POLICY MANAGEMENT

This Policy has been approved by the Board of SeeBeyondBorders Ireland

Amendments and or developments will be recommended to the Board from time to time as deemed appropriate. Formal reviews will take place before the expiry of three years from the anniversary date of approval by the Board.

Doc Name	Doc type	Approved by SeeBeyondBorde rs Ireland Board Date	Minute ref	Next Scheduled Board Review Due
Procurement Policy	Policy Review	15 July 2021	Item X	July 2024

The board of SeeBeyondBorders Ireland will review the Procurement Policy at 3-year intervals or as appropriate. The next update will be due by September 2024. The Board is responsible for ensuring that this policy is implemented effectively.

Signed

Name

Date