

GOVERNANCE & POLICIES



POLICY

Procurement and Ethical Purchasing Policy

Adopted by the Board of Directors

25th May 2026

KENT WITH UKRAINE LTD

www.kentwithukraine.co.uk

Procurement and Ethical Purchasing Policy

Kent With Ukraine recognises the importance of maintaining the highest standards when making purchases or procuring services in the advancement of our objectives. We are therefore pleased to publish our Procurement and Ethical Purchasing Policy which is revived annually by our Board of Directors. The last review of this policy took place in May 2026.

1. Policy Statement

Kent With Ukraine is committed to ensuring that all goods, services and works are procured lawfully, transparently, ethically and in a way that delivers value for money.

This policy exists to protect the organisation, its donors, partners and beneficiaries from fraud, bribery, corruption, conflicts of interest, poor-quality procurement, aid diversion, sanctions breaches and reputational risk.

2. Policy Scope

This policy applies to all purchasing undertaken by or on behalf of Kent With Ukraine, including:

- humanitarian aid supplies;
- vehicles, generators, medical, mobility or emergency equipment;
- transport, storage and logistics;
- professional services;
- construction, repair or refurbishment works;
- technology, software and communications;
- goods or services purchased in the UK, Ukraine or any third country.

It applies whether purchases are made using unrestricted funds, public donations, grant funding, restricted donor funding or in-kind support.

3. Core Principles

All procurement by Kent With Ukraine must be guided by the following principles:

Value for Money

Purchasing decisions must consider quality, suitability, reliability, whole-life cost, delivery time, maintenance, warranty, aftercare and impact — not simply the lowest price.

Transparency

Procurement decisions must be documented clearly, with an auditable record of quotes, approvals, supplier checks and reasons for selection.

Fair Competition

Wherever practical, suppliers should be given a fair opportunity to provide goods or services. Competition must not be manipulated to favour a preferred supplier.

Integrity

Kent With Ukraine has zero tolerance for bribery, kickbacks, facilitation payments, fraud, collusion, coercion, bid-rigging or any improper influence over procurement decisions.

Ethical Purchasing

KWU will seek to purchase from suppliers who respect human rights, labour standards, safeguarding, anti-slavery principles, environmental responsibility and lawful business conduct.

Local Ownership and Ukrainian Leadership

Where appropriate and safe, KWU will support responsible local procurement in Ukraine, helping to strengthen local resilience and recovery while managing risks around quality, corruption, sanctions and security.

4. Procurement Thresholds

Unless donor rules require a stricter process, the following thresholds apply:

Purchase Value	Minimum Requirement
Up to £350	One reasonable quote or receipt
£351–£1,500	One written quote, with clear Director approval
£1,501–£5,000	Minimum two written quotes where practical, with clear Director approval
£5,001–£25,000	Minimum three written quotes and written procurement justification
Over £25,000	Formal procurement process, written specification, evaluation record and Advisory Council approval

Where obtaining multiple quotes is not practical, for example in urgent humanitarian response, conflict-affected areas, specialist equipment procurement or limited supplier markets, the Board of Directors may delegate purchasing authorisation to a nominated in-county lead. The delegated authority shall be time and project limited with the clear expectation that the nominated decision-maker will adhere to the requirements and values of this policy and that they will account for all decisions in writing, with receipts and evidence.

5. Supplier Selection

Kent With Ukraine will never knowingly work with suppliers involved in corruption, organised crime, human trafficking, forced labour, child exploitation, sanctions evasion, terrorism financing, illegal arms trading or serious human rights abuse.

Suppliers should be selected based on:

- suitability for the requirement;
- price and value for money;
- quality and reliability;
- delivery capacity;
- relevant experience;
- ethical standards;
- safeguarding considerations where relevant;
- sanctions and legal compliance;
- aftercare, warranty or maintenance support;
- ability to provide proper invoices and documentation.

6. Supplier Due Diligence

Before appointing a supplier, KWU will always complete proportionate checks based on the value and risk of the purchase.

For higher-risk or higher-value procurement, checks may include:

- confirmation of legal identity or registration;
- beneficial ownership where relevant;
- sanctions screening;
- conflict-of-interest checks;

- review of reputation and public information;
- references or evidence of previous delivery;
- financial or operational capacity;
- safeguarding checks where services involve children, vulnerable adults or war-affected communities;
- investigation and confirmation that the supplier is not linked to Russia's war economy or sanctioned entities.

For Ukraine-based procurement, additional care will be taken where suppliers operate near conflict-affected areas, provide dual-use goods, transport sensitive items, or have links to public officials, military-linked structures or politically exposed persons.

7. Conflicts of Interest

Anyone involved in procurement must declare any actual, potential or perceived conflict of interest.

This includes:

- family or personal relationships with suppliers;
- financial interests;
- political or business connections;
- gifts, hospitality or favours;
- prior employment or advisory roles;
- any situation where impartiality could reasonably be questioned.

A person with a conflict of interest must not participate in the procurement decision unless the Advisory Council has reviewed and approved appropriate safeguards.

All declared conflicts must be recorded and the records maintained by the Board of Directors. All CIs will be published for transparency in our Annual Reports.

8. Gifts and Hospitality

Suppliers must not offer, and KWU representatives must not accept, gifts or hospitality that could influence or appear to influence a procurement decision.

Low-value courtesy items may be accepted only where they are modest, proportionate and recorded where appropriate.

Cash, personal discounts, commissions, facilitation payments or private benefits are strictly prohibited.

Please make sure that Section 10 of the KWU Anti-Corruption and Financial Safeguarding Policy is followed.

9. Fraud, Bribery and Corruption

Kent With Ukraine has zero tolerance for fraud, bribery and corruption and a dedicated policy for Anti-Corruption and Financial Safeguarding, which must be followed as a requirement of this policy.

For the purpose of this policy, examples of fraud, bribery and corruption include:

- false invoices;
- inflated prices;
- fake suppliers;
- duplicate payments;
- bid-rigging;
- collusion between suppliers;
- kickbacks;
- personal use of donated goods;
- diversion of aid;
- falsified delivery records;
- undisclosed conflicts of interest.

Any concern must be reported immediately to KWU leadership or through the Whistleblowing Policy. Where donor funds are involved, KWU will comply with donor reporting requirements.

10. Sanctions, Export Controls and Restricted Goods

KWU will take reasonable steps to ensure that procurement does not breach UK, Ukrainian, EU, US or UN sanctions regimes.

Particular care must be taken when purchasing:

- vehicles;
- generators;
- communications equipment;
- drones or drone-related items;
- protective equipment;
- medical equipment;
- dual-use goods;
- fuel or energy-related items;
- goods that could be diverted for military use.

KWU will not knowingly purchase from, transfer funds to, or provide resources through sanctioned individuals, entities or networks.

11. Ethical and Human Rights Standards

KWU expects suppliers to comply with applicable laws and ethical standards, including those relating to:

- modern slavery and human trafficking;
- child labour;
- forced labour;
- discrimination;
- harassment and abuse;
- safe working conditions;
- fair pay;
- environmental protection;
- safeguarding;
- anti-corruption.

Where serious ethical concerns arise, KWU may suspend, reject or terminate a supplier relationship.

12. Environmental Considerations

Where practical, KWU will consider environmental impact when purchasing goods and services.

This may include:

- fuel efficiency;
- durability and repairability;
- local sourcing where appropriate;
- reduced packaging;
- responsible disposal;
- energy efficiency;
- avoiding unnecessary transport emissions.

Humanitarian urgency may justify faster or less environmentally optimal procurement, but decisions should remain proportionate and documented.

13. Documentation and Record-Keeping

Kent With Ukraine must keep accurate procurement records, including:

- purchase request or rationale;

- quotes received;
- supplier selection decision;
- conflict-of-interest declarations;
- due diligence checks;
- approval records;
- invoices and receipts;
- delivery notes;
- asset records where relevant;
- photographs or handover documentation where appropriate;
- donor-specific records.

Records will normally be retained for at least six years, or longer where required by a donor, regulator or legal obligation.

14. Emergency Procurement

In urgent humanitarian, security or operational situations, KWU may use an expedited procurement process.

This may apply where delay would:

- put lives, safety or welfare at risk;
- prevent emergency aid delivery;
- cause loss of critical supplies;
- create unacceptable security risks;
- undermine urgent field operations.

Emergency procurement must still be documented afterwards, including:

- why normal procurement was not possible;
- who approved the purchase;
- what supplier was selected;
- why the cost was reasonable;
- what checks were completed;
- confirmation that goods or services were received.

15. Donor-Funded Procurement

Where procurement is funded by a donor, grant-maker or public body, KWU will comply with the donor's procurement rules where they are stricter than this policy.

This includes requirements on:

- quote thresholds;
- tendering;
- eligible costs;
- supplier restrictions;
- branding;
- asset ownership;
- reporting;
- anti-fraud clauses;
- audit access;
- procurement approval.

16. Assets and Inventory

Where KWU purchases significant assets, including vehicles, generators, laptops, specialist equipment or construction-related items, these must be recorded in an asset register.

The register should include:

- item description;

- serial number where available;
- purchase date;
- value;
- donor or funding source;
- location;
- responsible person or partner;
- handover status;
- disposal record where applicable.

Assets must not be sold, transferred, donated or disposed of without proper approval.

17. Partner and Downstream Procurement

Where KWU funds or authorises a partner to procure goods or services, the partner must apply standards equivalent to this policy.

KWU may require:

- procurement documentation;
- supplier checks;
- copies of invoices;
- photographs or delivery evidence;
- asset records;
- conflict-of-interest declarations;
- audit access;
- confirmation that funds were used for the agreed purpose.

Partner procurement risks should be considered as part of KWU's wider risk management process.

18. Approval and Authorisation

Procurement must be approved by an authorised person before purchase.

No individual may approve expenditure from which they, their family, their business or a connected party may benefit.

For high-value, high-risk or sensitive procurement, approval should be escalated to the Advisory Council or designated senior leadership.

19. Breach of Policy

A breach of this policy may result in:

- cancellation of procurement;
- refusal to reimburse expenditure;
- termination of supplier relationship;
- internal investigation;
- disciplinary action;
- donor notification;
- referral to law enforcement or regulators where appropriate.

20. Review

This policy will be reviewed annually in May, or sooner if required due to changes in law, donor requirements, operational risk, or KWU's work in Ukraine.