



GROUP PROCUREMENT POLICY



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Section 1 Introduction & Scope

1.1 Introduction and Scope

This document states the Independent News & Media policy for the purchase of all goods and services with the objective of ensuring a cost effective and legally compliant approach to purchasing, which meets the requirements of a devolved budgetary and PO system together with a Centralised Procurement function. The document relates to the management and control of all non-payroll spend, in respect of the acquisition of goods and services in all Departments and applies irrespective of the source of funding for a purchase.

1.2 Purchasing Objectives

Purchasing shall always be undertaken with the over-riding objectives of:

- Securing Maximum Value for Money (“MVFM”);
- Acquiring the most appropriate service for INM;
- Ensuring early engagement with the Procurement Function to ensure Procurement process applied
- Ensuring appropriate authorisation for spend.
- Ensuring compliance with all relevant legislation including Regulation (EU) 2016/679, known as the General Data Protection Regulation or GDPR

In pursuing these objectives, INM requires that procedures and processes are in place to ensure that:

- Competitive bidding and tender processes are performed;
- Suppliers are appropriately selected and authorised for use;
- Signed Contracts are in place for all relevant suppliers
- Signed Data Protection Agreements or Joint Controller agreements as appropriate are in place for all suppliers who have access to or process personal information.
- Suppliers are monitored for financial and non-financial performance;
- Goods and services are purchased only with proper authorisation;



- Goods and services received are correctly recorded;
- Payments are only made for goods and services received and authorised.

1.3 General Principles

The Procurement Policy recognises that a Centralised Procurement Policy is the most appropriate method to achieve the purchasing objectives for the Organisation. Departments must use centrally negotiated contract agreements (where they exist), in order to maximise purchasing power for the whole Organisation and to secure MVFM. In specialist areas the technical needs of the buying department will determine the specification and the Group Procurement Department will then arrange competitive quotations/tenders and select suppliers as appropriate, assisting departments to meet INM's Group Procurement Policy requirements. It is essential that the requirements of the Data Protection Impact Assessment Policy and Data Protection Policy are considered prior to submitting detailed requirements to Procurement. This should include completing Privacy Impact Assessments as appropriate.

Section 2 Responsibility for Procurement in INM

2.1 Audit Committee

The Audit Committee has wide-ranging terms of reference which include satisfying itself that satisfactory arrangements are in place to review the Company's systems and controls.

The Audit Committee shall:

- 2.1.1 Keep under review the effectiveness of the company's internal controls and risk management systems;
- 2.1.2 Review and approve the statements to be included in the Annual Report concerning internal controls and risk management.

2.2 Group Chief Financial Officer

The Group Chief Financial Officer ("Group CFO") is responsible for the financial administration of INM, including the annual formal review of procurement policy. The policy is kept under constant review and updated as required by the Group Procurement Director. Material alterations are discussed in advance with the Group CFO.



2.3 Group Procurement Director

The Group Procurement Director is responsible for:

- a) Setting the overall Procurement strategy for INM
- b) Ensuring an up to date Group Procurement Policy is in place and approving necessary changes to same
- c) Ensuring the availability of appropriate centrally negotiated Procurement contracts for the use in the purchase of goods and services (where necessary) by all departments;
- d) Ensuring commercial T& C's including pricing are being negotiated by the Group Procurement Team only
- e) Review and sign off on all contracts over €50k
- f) Aggregation & Leverage of the Group's budget spend achieving demonstrable MVFM;
- g) Mitigation of Commercial, Contractual and Legal risks to the Organisation;
- h) Ensuring that all contracts entered into by INM maintain and protect the best interests of the Organisation;
- i) Management of the Group Procurement Department and thereby delivery of a professional purchasing support service to all departments and
- j) Co-ordination of training for staff involved in purchasing activities throughout the organisation.
- k) To monitor Departmental Procurement Policy compliance.

2.4 Group Procurement Department

The Group Procurement Department is responsible for:

- a) Provision of a professional purchasing advisory and facilitation service to include preparation, management and issue of all tenders & RFQ's on behalf of INM based on detailed supply specifications provided by relevant Department(s) and reviewing of tender responses;



- b) Selection of the suppliers to be used throughout the organisation:
- c) Liaison and active involvement with Departments in all sourcing
- d) Preparing a scoring matrix and related tender analysis (with input and feedback from operations also) to determine which supplier to award supply to.
- e) All 3rd party supplier contracts, contract information including negotiating contractual terms, conditions and pricing directly with supplier(s) for INM;
- f) Review and sign off on all supplier contracts less than €50k including those provided directly by supplier
- g) Ensuring contracts over 50k are submitted to the Group Procurement Director for review and sign off.
- h) Maintenance of INM central repository for all contracts:
- e) Resolution with suppliers of service and contractual performance issues in liaison with departments and
 - i) Review of new Supplier setup forms and management of Approved Supplier List.

2.5 Heads of Departments

Heads of Departments as budget holders and managers have authority to incur expenditure on behalf of INM. They have day to day responsibility and accountability for ensuring that the Procurement Policy is applied to all purchases of goods and services within their defined authority.

Heads of Departments are required to ensure that:

2.5.1 Contracted Suppliers

- a) Contracted suppliers are used where applicable;
- b) Once Project approval given at Board/Executive level that early liaison takes place with Procurement to advise of Requirements to ensure the correct Procurement process can be initiated by Procurement.
- c) Ensuring Data Protection Agreements or Joint Controller Agreements as appropriate are



updated and put in place for all suppliers who have access to or process personal data.

- d) Ensuring Records of Processing (ROPA's) are put in place and kept updated for all process that involve personal data.
- e) Purchasing requirements are properly scoped out and these along with detailed SLA's, KPI's etc. are given to Procurement for inclusion in Request for Quotations/Tenders and Contracts.
- f) All negotiations on contract terms and conditions including pricing are channelled through Group Procurement only and not direct to Supplier (other than queries on technical specs etc)
- b) System Purchase Orders are used for the purchase of all goods and services (prior to delivery of good or service) except for items on Purchase Order Exceptions; see 3.1.5 below;
- c) Staff members engaged in purchasing activities liaise with the department budget owner and the Group Procurement Department before commencement of any financial interactions with suppliers;
- d) Staff engaged in purchasing activities know and comply with INM's objectives, by adhering to INM's Group Procurement Policy including the contract signatory authority in Section 5
- e) Ensuring regular operational vendor performance meetings are held with key vendors to manage performance and confirm compliance with regulations.
- f) Any issues relating to non compliance are corrected and reported on a timely basis to the Group Procurement Director and
- g) Any potential purchase greater than £/€50,000 (exclusive of VAT) **and / or** of strategic importance is brought to the attention of the Group Procurement Department at the earliest opportunity for tendering. Potential purchases less than £/€50,000 may not need to go to Tender but need to be brought to the attention of Procurement as quotes will still need to be obtained/checked by Procurement and T&C's negotiated etc

2.5.2 Non – Contracted Suppliers

All commercial discussions will be carried out by INM's Group Procurement Department. INM departmental staff may enter into discussions on technical and/or operational related requirements **only** for the supply of goods and services.

- **All contracts should comply with INM's Group Purchasing Terms and Conditions** a copy of which can be requested from the Group Procurement Function.
- **Changes to INM's Group Purchasing Terms and Conditions are prohibited.**



- **Any supplier requests for any changes to these Terms and Conditions must be forwarded directly to the Group Procurement Department and approved or rejected by the Group Procurement Manager and/or the Group Procurement Director.**

A written record of all contracts and agreements entered into must be maintained within the Group Procurement Department for both management and audit purposes, and in case of future contractual challenges. For this reason it is vital that all contracts are negotiated and finalised by the Group Procurement function only. Group Procurement will not accept any responsibility for contracts that have been entered into without the approval of Senior Procurement Management.

It is the responsibility of all Heads of Departments to supply the Group Procurement Department with all contracts for filing. (This relates to contracts entered into pre the introduction of this policy in April 2016 and contracts which have not gone through the procurement function for review and signing).

2.6 All INM Staff

It is the responsibility of all INM staff to comply with INM's Group Procurement Policy. Failure to comply with this policy may lead to disciplinary action up to and including dismissal.



Section 3 Purchasing Policy

3.1 Making a Purchase

INM's Group Procurement Policy **must** be followed for all purchases of goods and services from funds approved through the annual Budgeting Process. This applies regardless of the source of those funds.

3.1.1 General Principles

An INM approved Purchase Order is required for all categories of spend other than those specified in Section 3.1.5 (Purchase Order Exceptions).

All Employees and Contractors shall requisition or purchase goods or services for INM business purposes only.

3.1.2 Purchase Order System (eBIS)

The Purchase Order System (eBIS) provides the functionality to raise and approve Purchase Requisitions and add Goods Receipt Notes.

Invoices quoting a valid Purchase Order Number can be matched with preapproved Purchase Orders, ensuring only preapproved spend is processed.

The Procurement Director has overall responsibility for the management and control of the Purchase Order System and all associated training documentation.

3.1.3 How to Buy Guides

"How to Buy Guide" is used to explain the INM buying process for Products and Services '[POP How To Guides](#)' [< insert link >](#)

The Procurement Director has overall responsibility for the management and control of the Purchase Order Training Manual. Day to Day management of this is the responsibility of the Group Procurement Manager. The Group Procurement Manager is responsible for regularly reviewing this manual and recommending changes as appropriate to the Group Procurement Director.

All INM Employees and Contractors are required to:

- Adhere to the relevant "How to Buy Guide" for the category of Product or Service being procured;
- Ensure the Purchase Order Requisition is completed in line with the relevant "How to Buy Guide".



3.1.4 Retrospective Purchase Orders

“Retrospective” purchasing is when financial commitments are made to a Supplier without a valid Purchase Order (for those categories of spend requiring a Purchase Order) or a Supplier sending in an invoice without a valid INM Purchase Order number included on it or in the absence of a signed contract where relevant.

Committing INM to spend without the necessary pre - approved Purchase Order contravenes the Group’s Procurement Policy.

The Volume and Origin of Retrospective Purchase Orders will be monitored by the Group Procurement Department.

3.1.5 Purchase Order Exceptions

The following categories of spend (and only these categories) do **not** require a purchase order:

- Property Rentals (if paid by direct debit);
- Property rates/taxes;
- Travel related costs;
 - Hotels
 - Airfares
 - Company fuel & mileage
 - Short term vehicle hire (incl. rental & fuel)
- Utilities;
 - Gas/Diesel
 - Electricity
 - Water/Drainage
 - Telephone/Fax
 - Insurance (except Income Continuance and Death in Service Insurance)
- Finance Costs (Bank Fees, Interest etc.);
- Late Payment penalties (Litigation/Debt collection fees);
- Tax Payments;
- Dividend Payments;
- Subscriptions;
- Printer Hire;
- Car Leases & Fuel Cards (Bel Tel);
- Carrier costs;
 - Own carriers
 - 3rd party carriers



- Contributor Fees;
 - Most paid through Contributor online payment system
 - Remainder paid by Purchase Order Exception – routed through online Invoice Approval in Open Accounts.
- Employee Expenses;
- Sundry Payments
- Any other exceptional item must be preapproved by the Group Procurement Department.

Any on-going additions or deviations from this list must be approved by the Group Procurement Department.

3.2 Purchase Order Approvals

3.2.1 General Principles

- Expenditure should not be incurred by INM Group without appropriate authorisation;
- Where relevant following discussions with Procurement, a signed contract (with appropriate signatures per section 5 below) and Data Protection Agreement (for purchasing involving personal data) should be in place prior to the creation of a PO;
- Every Purchase Order requires the appropriate level of approval before being issued to a Supplier;
- A Purchase Order may not be approved by the same person who raised it (i.e. the “Requestor”)

The Head of Department may delegate his/her purchasing authority but at all times retains responsibility for ensuring that the Procurement Policy is applied to all purchases of goods and services within their defined authority.

3.2.2 Delegation

The Head of Department may approve Authorised limits as defined in this policy and within the authority limits specified. Such delegations would usually be made to facilitate the approval of both purchase orders and invoices.

Ongoing and temporary delegations of authority are granted in in line with the following:

- **Sideways or Upwards delegation only;**
- **Approver 1 £/€0 - £/€5,000;**
- **Approver 2 £/€5,001 - £/€50,000;**



- **Approver 3** £/€50,001 plus;
- **Approver 4** £/€100,000 plus.

Purchase Orders for which there are Designated Approvers are processed (approved / rejected) in a timely manner. Any Purchase Order approval task not processed within defined timelines shall be routed to the next level approver for that Cost Centre / expense code combination.

3.3 Call off Contracts

Where a “Call off Contract” exists for the supply of goods and services, the contract will already have been subject to the necessary level of competition and shall therefore always be used in preference to any other supply arrangement. It is not necessary to obtain further competitive quotations and orders may be placed directly with the supplier.

Examples of a “Call off Contract” may include a Framework Agreement, where the terms are already agreed for the regular supply of stationary or merchandised material.

3.4 Preferred Supplier

Where the Group Procurement Department has identified from an existing Framework Agreement, a preferred supplier (usually following a tender process) this supplier becomes INM’s Contracted supplier and must be used in preference to any other supplier available on that Framework.

3.5 Sourcing

Where a requirement for goods or services is identified and this cannot be met from an existing contract or Internal Service Provider it is essential to identify potential sources of supply in order to obtain an appropriate level of competition and achieve MVFM.

3.6 Confidentiality

Details provided by or agreed with suppliers (including those relating to tenders, contracts and pricing) are confidential to INM and these suppliers and must not be disclosed to others.

Confidentiality is a prerequisite within INM’s contractual arrangements with Suppliers.

Contracts are considered commercially sensitive. Product information, supplier costs and supplier contracts must not be disclosed to a competitor or used as the basis for a one-off purchase or for obtaining alternative quotations. Although in the short term such negotiation may be advantageous, in the long term it can create a loss of confidence and inhibit future benefits, i.e. it may directly affect the level of future competition.



3.7 Conditions of Contract

INM's Group Purchasing Terms and Conditions ("T&C's") must be used when entering into contracts for the supply of goods or services where a centrally negotiated contract does not exist. If in doubt check with the Group Procurement Manager or Group Procurement Director if the INM T&C's will suffice or if a formal contract is also required. These T&C's are written to protect the interests of IN&M in the case of dispute regarding the contract and to ensure that legal requirements are met, and obligations appropriately discharged.

Suppliers may still seek to impose their own Conditions of Contract. These are often very one-sided, in particular those governing rental or lease contracts. Purchasers should review carefully (and seek Procurement review) a supplier's conditions where these are to be applied

The use of any Supplier contract conditions must be preapproved by the Group Procurement Department before applying them to any contract.

3.8 Credit Cards

INM utilises corporate credit cards for the purchase payment of travel, accommodation, conference, entertainment and ad-hoc expenses for staff approved to hold such a card.

- Cardholders are responsible for the safe custody of cards and the security of card information, and are trusted to spend INM funds prudently,
- Cardholders must retain supporting documentation for all expenses incurred on their card,
- Credit Cards cannot be used to pay for purchases which are required to go through the PO systems and standard monthly payment run,
- Credit Cards may only be used for transactions incurred wholly and exclusively on INM business and
- Credit Cardholders must ensure they put in place signed Data Protection Agreements for all purchases that involve the processing of personal data.
- Cardholders must return their credit card permanently when they resign from their role, or leave their employment or engagement with INM, or they no longer require use of the card as part of their duties.

Expenditure charged to credit cards will be reviewed by the relevant Departmental Finance Managers.

3.9 Sundry Payments

Sundry expenses are costs incurred for small purchases which are usually a one time purchase, low in value and miscellaneous in nature. INM manages these purchases under the specific guidelines below.

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Sundry payments can only be used where all the following apply:

1. Value of purchase is less than £/€ 5,000;
2. One time Supplier only;
3. Supporting documentation must be provided (e.g. Supplier quotation).

Sundry payment requests are made through the Sundry Payment Request Form within the eBIS eFinance system.

Sundry Payments must not be used where an existing supplier exists

3.10 Ethics

All INM employees involved in any way in the purchasing process shall act ethically and in particular should have regard to INM's Code of Conduct Policy and Bribery & Corruption Policy.

Further guidance on these areas can be found on <http://indonet/hr/policies.shtml>

If in doubt, please consult your Manager or the Group Procurement Director.

Adherence to INM's Group Procurement Policy, including the use of INM's Group Purchasing Terms and Conditions, Code of Conduct Policy, Data Protection Impact Assessment Policy, Data Protection Policy and Bribery & Corruption Policy is intended to protect our employees and to ensure policy compliance and securing maximum value for money.



Section 4 Tendering

The procurement of goods and services should be carried out in an equitable and economic manner to achieve maximum Value for Money.

To achieve this, the tendering procedures are as follows:

- Initiate contact with the Group Procurement Department as early as possible for support on all tendering requirements;
- Confirm if a Data Protection Impact Assessment is required and submit the formal decision from the DPIA committee to procurement prior to tendering.
- A full written scope of the services required including KPI's/SLA's and reports required must be provided to procurement for inclusion in the Tender document/RFQ as appropriate.
- If the total contracted value for the purchase of goods or services is expected to exceed £/€50,000 per annum (excluding VAT), or if less but the service is of strategic importance to the business competitive tenders should be invited;
- At least three written tenders should be sought and
- All continuing contracts for services or supplies which exceed £/€50,000 per annum should be put out to tender or market benchmarked at minimum intervals of 2 years or prior to contract break clause/expiry if longer.

4.1 Single Tenders

Single Tenders should be avoided wherever possible to ensure that MVFM and the most appropriate services are being obtained.

If, exceptionally, it is proposed to invite a single tender for a particular project, the mitigating facts should be presented to the Group Procurement Department for approval to proceed before approaching the supplier/contractor in question.

4.2 Tendering Process

Budget Holders are able to communicate with the prospective suppliers on the content or specification of the tender. However they must ensure that they do not communicate any information that could be deemed to be providing an unfair advantage to any supplier as this may invalidate the supplier's application.

The invitation to tender document should have:

- Comprehensive and clearly written specifications;
- Delivery timescales;
- Deliverables by which performance will be measured;
- The closing date beyond which tenders will not be accepted, the format and the number of



- copies required and
- The name and contact details of the Group Procurement Department member dealing with the tender.
- Once finalised “Invitation to Tender” or “Request for Quotation” documents must be reviewed by the Group Procurement Director or the Group Procurement Manager;
- All tenders for anticipated spend in excess of €75k must be approved by the Group Procurement Director prior to being issued;
- A log file to be kept by Group Procurement in the specific folder of who the tender has been issued to, who has accepted/declined and a log of all queries and responses throughout the tender period;
- A tender review committee to be put in place to review tender responses
- A scoring matrix to be completed by Group Procurement on responses and feedback from tender committee;
- A tender evaluation to be prepared by Group Procurement outlining the tender process and final recommendation;
- Formal Notice of Award issued to both successful and unsuccessful suppliers by Group Procurement;
- Contract to be put in place for all supplies awarded and
- Legal review will be on a case by case basis.

Consider also and consult with the Data Protection team as to whether a Vendor Assessment Questionnaire is required to be issued to capture information necessary for Data Protection and Information Security Assessments.

Section 5 Contract Signatures

All supplier contracts/agreements (without exception) must only be signed by the following individuals once reviewed.

Contracts < £/€50k	Signature 1 –Group Procurement Manager
Contracts > £/€50k	Signature 1 - Group Procurement Director or Deputised
Contracts > £/€100k	Signature 1 – Group Procurement Director or Deputised Signature 2 – Group Chief Financial Officer/Group CEO or Deputised

Suppliers should not commence work until the contract is signed by both parties and where required a fully authorised INM Purchase Order has been issued. Delegation of signatory authority at CFO/CEO level should always be sent via email to the Group Procurement Director.

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5.1 Contract Document Filing

All signed original contracts will be managed by the Group Procurement Department centrally on the Contract Database and / or Contract Storage Room.

Folders will be created on the Procurement drive where all electronic information e.g. supporting documentation can be filed. Access to this drive to be restricted to Procurement. A copy of the contract will be issued to the relevant Department Head to enable PO to be created to ensure pricing etc is correct.



Section 6 Capital Equipment Approval Procedures

6.1 General Principles

To ensure that Capital Expenditure is appropriately approved, with sufficient scrutiny of the expenditure proposed and to also ensure actual spend is in line with budgeted Capex spend the following procedure must be followed.

6.2 Procedure

When new projects are proposed by departments a Capital requisition is completed.

Capital Requisition Form must include the following:

- Executive summary giving a clear overview of the project;
- Business case must be put forward – (3 quotes, payback, etc.) Finance expert to support production of business case;
- Life expectancy of new item/project estimated;
- Details of items being replaced/ disposed of with new item/project coming in place;
- Details on any additional operating expenditure associated with the purchase of the asset (e.g. annual charges);
- Confirmation that all required Data Protection Requirements are in place including but not limited to Data Protection Impact Assessment, DPA and risk assessment.
- Capex Form must be signed by:
 - Requestor (Head of Department);
 - Group CIO (if IT hardware or software related);
 - Group Procurement Director;
- Finally typed completed Capex Form must be submitted to Capex Accountant no later than 17.30 of the Wednesday of Week 2 on the Financial Calendar for inclusion in pack for monthly capex meeting.



Monthly Capex Meeting

- Capex meeting to take place monthly on the Monday of Week 3 on the Financial Calendar;
- All Heads of Departments who have submitted requisitions are required to attend. Specialists on proposed projects should also attend;
- All requisitions must be reviewed & considered by Group CFO;
- After Capex meeting, the Capex Accountant will send an email detailing capex approved/ rejected to the relevant Head of Department;
- Capex requests in excess of €100k must be further approved by the Chairman;
- Capex project reference number to each Capex when fully approved;
- If an over-run in approved spend on a Capex project is likely, this over-run must be brought to the attention of the Group Procurement Director, Capex Accountant & Group CFO as soon as this becomes apparent.

6.3 Capex Purchase Order Procedure (eBIS)

Only after approval has been received to proceed with your Capex project, can a relevant Purchase Order be created within eBIS for this spend.

Please refer to the “How to Buy Guide” below.

[‘POP How To Guides’ < insert link >](#)

6.4 Asset Registration

Asset registration and accounting for Capital Assets must adhere to SWS (INM) Financial and Management Reporting procedure documents 63, 109, 110, 183, 209, 298 and relevant accounting standards (e.g. IAS 16).

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Section 7 Supplier Setup

Procurement to review New Supplier setup forms.

New supplier setup and amendments to existing suppliers are managed by the South Western Team in Poland. Changes to existing supplier setups are reviewed by the Finance Department. No new supplier can be setup unless that supplier has been authorised for use by the Group Procurement Department.

Please refer to INM Account Payable Procedure 242.

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Glossary

Acronym	Explanation
Capex	Capital expenditure
Group CFO	Group Chief Financial Officer
Group PD	Group Procurement Director
MVFM	Maximum value for money
Purchase Order System	Known as eBIS
T & Cs	INM's Group Purchasing Terms and Conditions
Internal Service Provider	Another team within INM Group
DPA	Data Protection Agreement