

Deflecto Europe – Ethical Trading Policy

Policy Statement

This company supports and endorses the activities of the Ethical Trading Initiative (E.T.I.) and is committed to so conducting its business as to ensure that the rights of employees, at all stages of the supplier chain, are recognised and maintained.

In particular, the company has introduced systems and procedures that ensure: -

Our commitment to this initiative is recognised at senior management level and communicated to all our staff.

"Ethical Trading" is an integral watchword for all our core business relationships.

Sufficient human and financial resources exist within the organisation so that accurate monitoring of and reporting on the maintenance of this policy is possible.

In ensuring the maintenance of this policy, the company has adopted the principle that prevention is better than cure and to this end concentrates on supplier selection criteria that meets the ethical requirements of this policy.

In addition, we are committed to ensuring that our own employment practices are benchmarked against the best companies in our industry.



Adrian Mayes
Managing Director - Deflecto Europe

Date: May 2026

Responsibilities

The Managing Director has overall responsibility for ensuring that all aspects of this policy are maintained and promoted amongst all the staff and in particular to:-

Review business activities with regard to supplier selection against the criteria specified in this policy
Ensure that sufficient funds are made available for the operation of this policy

Ensure that sufficient funds are made available for the training of all staff within the organisation with regard to the operation of this policy.

The Financial Director is responsible for:-

Ensuring that an up to date "Supplier List" exists and that supplier audits are undertaken as required. Ensuring that all staff that are involved in identifying appropriate suppliers are aware of the requirements of this policy and ensure that all suppliers comply with the requirements of Ethical Trading.

The Technical Director is responsible for:-

Ensuring that all purchases made by the technical staff are from approved suppliers only.

Where approved suppliers cannot supply the goods required, they ensure that any alternative suppliers are appropriately audited prior to ordering goods which are to be used in technical installations.

Ensuring that all technical staff are clear about their responsibilities in regards to this policy and its day to day operation.

The Sales Manager is responsible for:-

- o Ensuring that all purchases made by the sales staff are from approved suppliers only.
- o Where approved suppliers cannot supply the goods required, they ensure that any alternative suppliers are appropriately audited prior to ordering goods for re-sale.
- o Ensuring that all sales staff are clear about their responsibilities in regards to this policy and its day to day operation.
- o Ensuring that all members of the sales team are fully conversant with the requirements of this policy.

Monitoring of the Policy and Compliance

It is the responsibility of the Ethical Trading Team (the E.T.T.) to monitor the activities undertaken by the organisation and ensure that effective implementation of the policy occurs.

In monitoring the policy, the E.T.T. ensures that the codes of practice that are adopted by this company are complied with by all staff members and that a clearly documented audit trail of all activity exists to prove compliance with the policy.

With regard to suppliers, it is the responsibility of the E.T.T. to identify issues of non-compliance with this policy and to set out for the supplier the acceptable criteria along with deadlines for compliance. In this way, it is the intention of this company to build business partnerships with suppliers that are committed to achieving acceptable levels of employee rights recognition in line with the relevant core ILO Conventions on workers rights.

Where supplier compliance issues are seen to fall outside of our policy requirements, remedial actions are encouraged along measures of continuous improvement, short term objectives and targets for achievement are agreed with the supplier.

Whilst we are willing to assist our suppliers in implementing ethical trading, if the supplier fails to achieve the minimum standard, either on initial performance or in implementing remedial actions, it is our policy to remove the supplier from the "Approved Supplier List."

Development of the Policy

We are committed to achieving continuous improvement in our own systems and processes for the furtherance of ethical trading and where appropriate seek out other organisations with a view to promoting the ethos of ethical trading and work with such companies for our mutual benefits.

In committing to the development of our own policy, we recognise the important part that can be played by all employees of the company and we are committed to encouraging them, by confidential means if necessary, to report to senior management any issues that occur within our organisation that offends this policy.

Training and Awareness

In order to encourage our staff to assist us in the development of the policy, we recognise our responsibility to ensure that sufficient training and awareness exists within the work force for them to raise issues of concern.

Accordingly, it is the policy of this organisation to ensure that sufficient resources of time, funds and personnel are set aside each year for the introduction of staff to or the re-enforcement of ethical trading objectives and the procedures that have been introduced by the company to further the promotion of such standards.

It is also the policy of this organisation to promote the ethos of ethical trading amongst its supplier base and resource is set aside on an annual basis for the increasing of awareness of our supplier base and to review their levels of commitment to this policy.

Assessment of supplier commitment is undertaken on an annual basis and forms part of the supplier assessment program. A reduction in equivalent commitment results in the supplier being removed from the "Approved Supplier List."

Negotiation and Incentives

In return for the expectation placed on our suppliers for ethical trading protocols to be observed, it is the policy of this company to ensure that nothing in the negotiations and dealings between us and our suppliers will endanger their lasting commitment to ethical trading.

Accordingly, in all our dealings with our suppliers we shall observe the financial demands of promoting an ethical trading culture and work with them towards achieving an ethical price for the goods that we purchase, that recognises the need for employees to be able to work:-

- free from forced or bonded labour;
- with rights of association and collective bargaining;
- in conditions that are safe and hygienic;
- for wages that allow them to live honourable lives;
- hours that are not excessive;
- in places free from discrimination;
- where regular employment is provided; and
- where no harsh or inhumane treatment is allowed

Furthermore, it is our company's policy to ensure that no products are supplied from companies that abuse their national employment legislation to introduce child labour and preferably encourages children within their community to further their school education in a quality learning environment until such time as they are at least 15 years of age.