

# Our corporate social responsibility policy



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In addition to our Quality and Environmental Management Systems, we aim to outline the promises and actions of Ocee International's Corporate and Social Responsibility. By incorporating the UN Sustainable Development Goals into our company operations, we strive to employ the best practices possible and prove our commitment to sustainability.

We class ourselves as a socially and environmentally responsible company, who are committed to 'Making Global Goals Local Business'. This Corporate Social Responsibility Policy is made up of a variety of policy statements addressing the UN Global Compact 10 Principles, in the four main categories; Human Rights, Labour, Environment and Anti-Corruption.

- o Modern Slavery and Human Trafficking Policy Statement
- o Ethical Procurement Policy Statement
- o Equal Opportunities and Diversity Policy Statement
- o Anti-Harassment and Bullying Policy Statement
- o Whistle Blower Policy Statement
- o Anti-bribery, Fraud and Anti-corruption Policy Statement
- o GDPR Policy Statement
- o Sustainability Policy Statement

Our Sustainability Policy Statement not only addresses the Environment principles of the UN Global Compact but also aspires to address the UN 17 Sustainable Development Goals through our International Group promises and individual company actions.

All of the statements listed in this document support the policies, procedures and requirements documented in our Integrated Management System; where our Environmental, Quality and Health and Safety Policy can be found – please contact our UK SHEQ Coordinator for a copy. Our aim is that by June 2021, Ocee Design, Race Furniture and Four Design will be under a joint certification for ISO14001 and ISO9001.



## A message from our CEO...

At Ocee International, as we continue to grow, we understand that we may have a bigger impact on the world. Our sustainability strategy, based on the UN Sustainable Development Goals, aims to minimise any negative impact, and continue to strengthen the positive impact we have on society and the environment.

We view society as everyone from our employees to our customers, our suppliers, as well as our local and global communities. We understand the huge responsibility we have as an international company, and this Corporate Social Responsibility Policy aims to highlight how we will support good, ethical business.

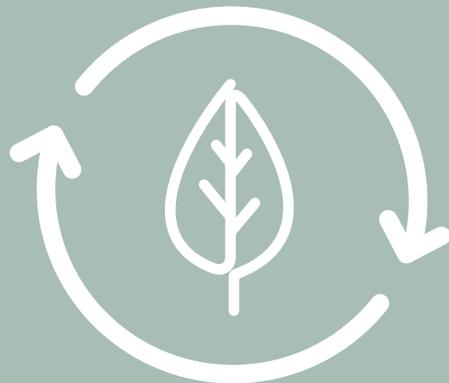
Please join us in working towards a more sustainable furniture industry.



Alistair Gough  
Group CEO



# Our sustainability policy statement



This Sustainability Policy Statement looks to complement our quality and environmental policy statements which are found in our Integrated Management System.

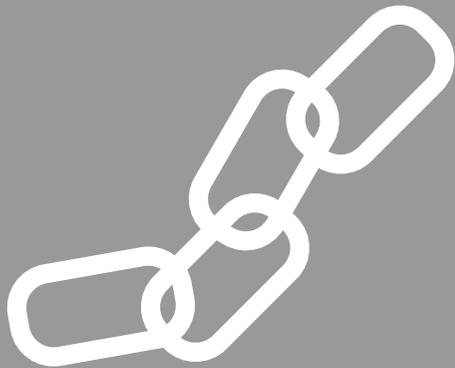
## Our Group Sustainability Promises for the upcoming years:

1. Ensure the highest possible environmental standards are achieved
2. Guarantee responsible procurement and an ethical supply chain
3. Develop and maintain high material transparency to enable sustainable consumption
4. Innovate sustainable product design which not only enables customers to reduce their environmental impact but also endeavours to provide solutions for the local and global challenges of today
5. Continue to reduce our environmental impact according to technological possibilities
6. Be recognised for positively contributing to society and the environment

For further information on how we will achieve these goals, please visit the Responsibility section of our website.



# Our modern slavery and human trafficking policy statement



We acknowledge our responsibility under the Modern Slavery Act 2015 and commit full support to protecting international human rights. We will drive out acts of modern-day slavery and human trafficking within our business and from within our supply chains, including subcontractors and partners.

## Our Group Promises and Actions

The company will not support or deal with any business knowingly involved in modern slavery, including but not limited to slavery, servitude, human trafficking and forced labour.

Modern day complex global supply chains which lack transparency, have the possibility of hiding cases of forced labour and slavery. Our responsibility as an international organisation is to alleviate these possibilities. As part of the company's due diligence processes into slavery and human trafficking, the supplier approval process will include a review of the controls undertaken by the supplier. Our Supplier Code of Conduct outlines the expectations we have of our suppliers, including human rights, conditions of employment, and labour. We will undertake an annual audit to ensure compliancy to the Code of Conduct, throughout

our supply chain. Our full policy and the Modern Slavery Act 2015 will be accessible to all employees electronically. The Company Directors and senior management team shall take responsibility for implementing this policy and its objectives and shall provide adequate resources and investment to eradicate any possibilities of modern slavery within the organisation and associated supply chain.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the Company, and that it is regularly reviewed by the Directors to ensure its continuing stability and relevance to the Company activities.



# Our sustainable & ethical procurement policy statement



Responsible procurement is an essential part of Ocee International's efforts towards the Sustainable Development Goals and the importance of both social and environmental factors to consider when purchasing materials.

Our timber is procured from responsible suppliers who source from sustainably managed forests, ensuring we are only involved in legal logging from sites that follow replanting schemes to ensure the material is renewable and sustainable. We aim to increase the proportion of certified wood used in our products to increase the traceability of supply.

We understand that our purchasing power effects many actions throughout our supply chain. We have reasonable lead times to ensure pressure isn't set upon our suppliers meaning they must outsource work to companies that may not have work conditions compliant with our policy.

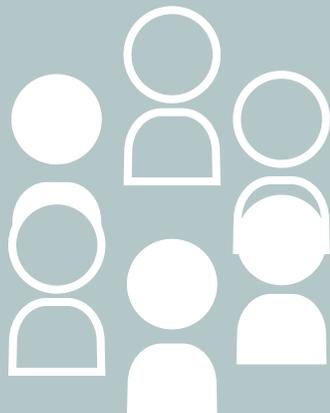
We will in fact use this purchasing power to encourage suppliers to become more sustainable:

- o matching our high environmental standards
- o ensuring material transparency
- o proving compliancy to our Supplier Code of Conduct mentioning Labour, Human Rights, Working Conditions and the Environment

Our Supplier Code of Conduct document highlights these expectations, which is communicated to every supplier at the start of the contract and is available for all stakeholders upon request. We expect our suppliers to be compliant and require verification of policies to go forward with the contract. This is just one step we take to ensure an ethical supply chain.



# Our equal opportunities and diversity policy statement



Ocee International is committed to providing equal opportunities for all employees, including job applicants. The below points are integral to achieve this:

- o Our Equal Opportunities policy will comply with current statutory requirements.
- o Equal opportunities will be applied regardless of disability, skin colour, race, religious beliefs, age, sex, marital status, sexual orientation, gender reassignment, ethnic origin or national origin.
- o The Company will provide equal opportunities when recruiting, selecting, training and promoting individuals.
- o All employees will abide by the policy in the treatment of other employees, clients and visitors alike.
- o Management responsible for training, recruiting and the management of fellow employees shall abide by the equal opportunities policy and statement.

Any employee found to be in breach of this equal opportunities' declaration will be subject to disciplinary action in accordance with the Employee Handbook. Such action, dependant on the seriousness of the breach, or repeated breaches of the policy may result in dismissal.



# Our anti-harassment and bullying policy statement



We acknowledge our responsibility under the Health and Safety at Work Act 1974 and the Charter of Fundamental Rights of the European Union; to provide a safe place and system of work; aiming to ensure that all our employees are treated with respect and dignity, free from harassment, intimidation and other forms of bullying in the workplace.

This covers every individual working with us irrespective of their status, level or grade. It therefore includes Senior Managers, Directors, employees, consultants, contractors, trainees, part-time or fixed-term employees, casual and agency staff.

We are responsible for ensuring that our employees are not harassed, bullied or discriminated against based on their sex, sexual orientation, age, marital status, gender reassignment, race, religion, skin colour, nationality, ethnicity or disability.

This policy is communicated to employees upon commencement and is available from Line Managers or HR upon request; which explains the procedure for Employees to report cases of bullying or harassment. Complaints will be managed and investigated in a timely and confidential manner, with due respect for the rights of all parties concerned. Conclusion that harassment or bullying has occurred will result in prompt action to stop any forms of current and recurrence of harassment and bullying. Subsequent decisions will be dealt with under our disciplinary procedure, determining the dismissal or transfer of the offender, and/or mediation between the employees.

Employees working in the UK are protected under our Whistle blower policy, all cases will be dealt with the upmost confidentiality.

# Our whistleblower policy statement

In accordance to the Employment Rights Act 1996, our whistleblower policy that exists in the UK, is to ensure protection to all employees and workers who raise any wrongdoings without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.



# Our anti-bribery, fraud and anti-collusion policy statement

Ocee International is committed to conducting all our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. We are governed by the legal frameworks in both the UK and Denmark, including the Bribery Act 2010, in respect of our conduct both at home and abroad. Our zero-tolerance approach to bribery and corruption applies to all employees, contractors, subcontractors, consultants, business partners and any other parties associated with the company.

## **Bribery is...**

- o giving/promising a financial or advantageous offering to another party with the intent of the other party performing misconduct
- o requesting/accepting a financial or advantageous offering from another party with the intent of the other party performing misconduct

## **Collusion is...**

- o an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party

All stakeholders mentioned have responsibility to prevent, detect and report cases of bribery and collusion. All relevant cases will be handled in accordance to our Whistleblowing Policy. Any non-employees who wish to voice a concern should contact their normal point of contact within the Company, or if that person is implicated, they should contact a Director of the business.



# Our GDPR policy statement

We understand our responsibility under the EU Regulation 2016/679 General Data Protection Regulation (GDPR) to protect personal data. We place high importance on the fair handling of all personal data, respecting the legal rights, privacy and trust of all individuals with whom it deals.

GDPR defines 'personal data' as any information identifiable to a person. For example; name, number, location data, online identifier; or to factors specific to the physical, mental, cultural, or social identity of that person.

Our full policy outlines the Company's obligations to collection, processing, transfer, storage, retention and disposal of personal data. The mentioned procedure is to be adhered to by the Company and any stakeholders who work on behalf of the company. Any personal data breaches must be reported immediately to the Company's Data Protection Contact and dealt with accordingly. If the breach is likely to result in risk to the rights and freedoms of data subjects, they must be informed immediately. The Company's Data Protection Contact must also inform the Information Commissioner's Office within 72 hours of becoming aware of the breach. This is explained in more detail in the full policy; please contact HR for a copy of the full Data Protection Policy.

