

ETHICAL POLICY STATEMENT

This is the Ethical Policy Statement of Scalemaster Limited

Scope

This policy statement covers the approach taken by company in sourcing materials and goods from UK based and overseas companies, our manufacturing, selling and distribution of products and disposal at end of life.

This Ethical Policy Statement is based on the internationally recognised Social Accountability 8000 (SA 8000) criteria and the ETI (Ethical Trading Initiative) Base Code. (SA8000 is an auditable certification standard based on the UN Universal Declaration of Human Rights, Convention on the Rights of the Child and various International Labour Organization (ILO) conventions).

Our Values

Scalemaster is committed to responsible corporate behaviour, which governs the way we interact with our key stakeholders: customers, business partners, employees, suppliers, subcontractors and the setting in which we operate, covering local communities and the environment. Our reputation, together with the trust and confidence of those with whom we deal, is one of our most valuable assets and so the values of integrity and responsibility underpin all that we do.

Our Aims

- to manage the company as a sustainable and successful business
- to ensure that all our business activities have a positive economic, social and environmental impact on the communities in which we operate
- to engage with all our stakeholders and to foster good relationships with them
- to strive for the highest standards of health and safety in the workplace so as to minimise accidents, incidents and lost time
- to develop and motivate our employees, to treat them fairly and to ensure that they are fully engaged in the business
- to comply with all legislative environmental standards and to exceed them where appropriate
- to promote sustainability through our activities by maximising the efficiency of our resource uses, effective project management and minimising waste
- to aspire to leadership in the industry by use of bio-degradable, non-toxic and recyclable materials wherever possible
- to ensure the sustainability of our activities ensuring compliance with all health and safety and environmental legislation, regulations and codes of practice so that our conduct is of the highest possible standard
- to undertake our activities in a way that minimises potential adverse effects on society, the environment and those living or working in proximity to our site
- to support British Industry and to source products from the UK wherever possible
- to procure goods and services through approved suppliers and contractors whose products and services meet our requirements and whose quality and environmental practices correspond with our own
- to carry out all financial transactions and financial reporting, with due observance of all relevant laws, regulations and financial standards
- to avoid any activities that could involve or lead to involvement in any unlawful practice or any harm our reputation or image
- to maintain appropriate data protection, privacy and confidentiality policies and procedures

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Our Impact on the Environment

The Company will consider, wherever practicable, the environmental impact of goods and services from design concept to production, through use and end-of-life disposal when making purchasing decisions

- We will seek to reduce waste through reviewing the amount and type of materials being used and optimise opportunities for the use of recycled or reclaimed materials
- We will seek to reduce our carbon footprint by sourcing goods and materials with low embodied carbon
- The use of materials with non-hazardous content will be maximised wherever technically and commercially feasible
- We expect our suppliers to manage their own impacts and to work with us to meet our environmental objectives
- We expect our suppliers to have an environmental policy and to operate in compliance with all applicable laws and regulations
- We will ensure the specification of environmentally sustainable materials wherever technically and commercially feasible

Our Suppliers & Subcontractors

Scalemaster will only carry out business with responsible suppliers and subcontractors who understand the nature of the products, materials and services they are supplying, and who recognise their responsibility to protect the environment and foster good relations with their employees and local communities. We will support local procurement wherever technically and commercially feasible.

- Local procurement of goods, services and materials will be encouraged with a view to supporting local communities and reducing the overall carbon footprint of our activities
- Where possible, we will maximise the benefits to the local community from our projects by working with local authorities and organisations to recruit local labour and source goods and services from the local region
- As at January 2023 Scalemaster sources over 95% of its products from British-based companies

In order to ensure adherence of our employees and supply chain to our ethical sourcing policy the following arrangements are in place:

- Suppliers are required to inform us of their sourcing principles and production capabilities and if necessary detailed remediation plans for dealing with non-compliance
- Should our representatives wish to undertake a site visit suppliers must ensure that access to all factory premises is not restricted and must provide all the information requested for verification
- We ask our suppliers to maintain on file, all documentation necessary to demonstrate compliance with Scalemaster's Ethical Policy. (We guarantee that all information provided will only be used and maintained in the strictest confidence)
- Our approved supplier database is monitored and reviewed bi-annually
- We reward excellent supplier and subcontractor performance through repeat business opportunities and help develop mutually beneficial long-term relationships
- We strive to be alert to any signs which may indicate that a production process may involve exploitation or represent a danger to health, safety or the environment

Our Manufacturing Operations

Energy

Wherever possible, suppliers and subcontractors shall seek to fully exploit opportunities for resource and energy optimisation and efficiency. The supply chain is encouraged to use clean and low energy sources wherever reasonably practicable. For example, supplying products rated in accordance with EU Energy Label Class A + and ++, Energy Saving Recommended (ESR) endorsed, or those compliant with other recognised equivalent standards, such as computer screens and monitors that meet current 'Energy Star'

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requirements. Where relevant, material constituents will be expected to achieve an area-weighted average rating of A or B, as defined in the Green Guide to Building Specification.

Healthy materials

Scalemaster is committed to proactively selecting and using, where possible, materials that are benign to people and the environment. Where reasonably practicable, suppliers and subcontractors shall seek to use non-toxic and non-polluting materials and substances in the products and services they supply. All materials and substances must comply with relevant legislation.

Restricted substances and materials

Upon request, suppliers and subcontractors will need to confirm to Scalemaster the extent to which they are Registration, Evaluation, Authorisation and restriction of Chemicals (REACH) compliant.

Use of secondary materials

Scalemaster encourages the use of materials with recycled content. We also support the use of products that are designed with minimal packaging and which can either be reused or recycled. Suppliers and subcontractors shall maximise the use of recycled content in products and packaging. Suppliers and subcontractors shall retain information on the recycled content associated with products and packaging supplied. They may need to make this information available, upon request, to Scalemaster.

Our People

Our policy is to source and purchase goods which are produced and delivered under conditions that **do not** involve the **abuse** or **exploitation** of any persons; encompassing the following aspects:

- Employment is freely chosen
- Freedom of association
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed

Our ethical sourcing focuses on conducting sourcing activities at the highest possible standards of responsible, sustainable and socially aware business practice. It also includes managing relationships with our suppliers who are responsible for the auditing, monitoring, reporting and implementation of corrective action plans within their own supply chains.

We expect our suppliers and sub-contractors to share our commitment to Health and Safety by implementing robust policies and procedures that put the health and safety of employees and others who could be affected by their activities at the heart of their operations.

- We are committed to the promotion of ethical working conditions including fair wage, working hours and equal opportunities
- We will respect the principles of human rights, to treat employees with dignity and respect and to ensure that no child or forced labour is employed
- Suppliers and subcontractors shall comply not only with all domestic employment legislation but also will comply with both all applicable International Labour Organization (ILO) conventions and protocols and the United Nations Universal Declaration of Human Rights. This commitment includes not using child or forced labour and activities that relate to the rights of and entitlements of indigenous peoples

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Our Principles Regarding Child Labour

Scalemaster respects different cultures and values in countries where we operate and source our raw materials and products, but does not compromise on the basic requirements regarding the Rights of the Child. The requirements in this procedure are mandatory to all suppliers and their sub-contractors.

The Company supports the United Nations (U.N.) Convention on the Rights of the Child (1989) which stipulates:

- “All actions concerning the child shall take full account of his or her best interests” (Article 3)
- “The right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical mental, spiritual, moral or social development” (Article 32.1)

Scalemaster also recognises the International Labour Organisation (I.L.O) Minimum Age Convention No. 138 (1973) which defines a child as any person below fifteen (15) years of age, unless local minimum age law stipulates a higher age to work or mandatory schooling, in which case the higher age would apply. If, however, the local minimum working age is set at fourteen (14) years of age in accordance with exceptions for developing countries, the lower age will apply.

Implementation

All actions to avoid child labour shall be implemented taking the child’s best interests into account.

Scalemaster requires that all suppliers recognise the UN Convention on the Rights of the Child, and that suppliers comply with the relevant national and international laws, regulations and provisions applicable in the country of production. Suppliers are obliged to take the appropriate measures to ensure that no child labour occurs at their and their contractors’ places of production. We are willing to work with our suppliers to ensure their management systems are sufficiently effective and robust to minimise the possibility of child labour being inadvertently engaged in employment.

Young Workers

Scalemaster supports the legal employment of young workers. Young workers of legal working age have, until age 18, the right to be protected from any type of employment of work which, by its nature or the circumstances in which it is carried out, is likely to jeopardise their health, safety and emotional and physical wellbeing. Scalemaster requires all its suppliers to ensure that young workers are treated according to the law, to include measures to avoid hazardous jobs, night shifts and ensure not less than minimum wages. Limits for working hours and overtime should be set with special consideration to the workers’ age.

Documentation

The supplier shall maintain documentation for every worker verifying the worker’s date of birth. In countries where official documentation is unavailable, the supplier must use appropriate assessment methods as per local practice and law.

Monitoring

All suppliers are obliged to keep Scalemaster informed at all times about all places of production (including their sub-contractors). Scalemaster reserves the right to make unannounced visits at any time to all places of production (including their sub-contractors) for goods intended for its supply chain and reserves the right to assign, at our sole discretion, an independent third party to conduct on-site inspections and audits in order to ensure compliance with our policy.

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Child Labour Remediation Procedures

If child labour is found in our supply chain we will seek to work in partnership with the supplier and appropriately qualified organisations to develop a responsible solution that is in the best long-term interests of the child, ensuring that the affected child is safe and protected from victimisation or further vulnerability. A corrective action plan will be agreed with the supplier which may comprise the following, but not exhaustive, actions:

- Take immediate action to minimise the risk to the child by removing them from the production area and/or stopping their work and removing them to a safe place, such as government child protection services. If trafficking or other criminal activity is involved the relevant authorities will be contacted
- Collate a list of all potential child labourers and young workers
- Seek advice and help from a recognised local non-governmental organisation such as Save The Children (<http://www.savethechildren.net>) that deals with child labour or the welfare of children
- Develop a remediation action plan that secures the child's education and protects their economic well-being, adequate accommodation and living conditions. This should take place in consultation with and respecting the views of the child and their family, respecting their needs and wishes. Any solution must improve the child's situation and not make the child more vulnerable
- Explain the legal requirements and restrictions on working ages to the affected children and assure them that, if they wish, they will be employed by the facility in question when they reach local law legal working age
- Whether the child contributes to the livelihoods of their family or they are self-dependent, his or her wage should continue to be paid by the affected facility until such time as they reach local law working age, or until an alternative long-term solution has been agreed with the child and their family (for example employment of an adult family member in place of the child labourer)
- Communicate and engage in dialogue throughout the whole remediation process with all affected parties and establish a regular review system to monitor progress
- If Child Labour is found in a part of our supply chain, we commit to continuing our business relationship with the Supplier and providing them with support if they are willing to work together to develop responsible solutions that are in the best interests of the child. Suppliers that do not demonstrate co-operation or commitment to urgent action may be subject to formal measures such as suspension of business and a discontinuation of sourcing

Anyone having concerns or questions regarding young or child workers should contact the HR Advisor at Scalemaster.

Anyone having concerns for a child or young person that they wish to discuss in confidence with a third party is advised to contact the NSPCC Helpline – Tel: 0808 800 500 Email: help@nspcc.org.uk

Our Products

Our products stand on their own merits and quality. We do not engage in misrepresentation, exaggerated claims or other forms of false advertising. It is not Company policy to knowingly infringe the copyright, trademarks, patents or other properly registered intellectual property of others.

Publications and other printed materials

Scalemaster wishes to minimise the use of printed publications and other printed materials as much as possible and as such, favours the use of electronic publications. However, where this is not possible the supplier or subcontractor shall ensure that any organisation engaged to undertake printing in relation to

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Scalemaster work is certified to ISO 14001 or taking steps towards managing their environmental impact through other initiatives such as BS 8555.

Our Customers

We believe that integrity in dealing with customers is essential for a successful and sustained business relationship. This principle governs all aspects of our approach. We give our customers factual information about prices, schedules services and other terms of business. We value our customers and the trust that they place in us. We will safeguard the information provided to us by our customers in accordance with relevant laws and contractual commitments.

Our Business Partners

Suppliers, subcontractors, advisors or representatives are treated fairly, honestly and in accordance with agreed terms. Any complaints from customers, suppliers, subcontractors, advisors or representatives will be taken seriously and dealt with promptly and fairly.

We are committed to establishing mutual trust and mutually beneficial relations with our business partners e.g. suppliers, banks, collaborative associates, etc.

We expect our suppliers to uphold the same rigorous standards as ourselves. For example, neither we, nor our suppliers will use child labour, or any form of forced, bonded or indentured labour, nor will we, or our suppliers offer, pay or accept bribes.

Our Competitors

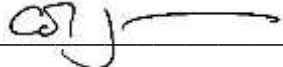
We do not collaborate with competitors to establish or maintain prices or to unlawfully restrict trade. We do not disparage our competitors or their products. We will always compete vigorously, but in a fair and ethical way and no attempt will be made to improperly acquire competitors' trade secrets or any other confidential information.

Our Political Engagement

We lobby for effective legislation and regulation through the key industry trade association. We do not give donations to political parties or incur EU political expenditure.

Issue History

Issue No.	Date of change	Summary of change
1	21/05/2019	First Issue
2	09/03/2021	Update to specify ETI Base Code principles
3	21/02/2023	Update to Include Child Labour Principles and Remediation Procedures

Approved by  Date 21/02/23
Managing Director