

O&S Doors®	INTERGRATED MANAGEMENT SYSTEM	Prepared by	GB
		Approved by	IC
	ETHICAL TRADING POLICY	Issued by	TJ
		Effective from	28-Apr-2025
IMS-POL-023			

1.0 PURPOSE

O&S Doors Ltd are committed to upholding the highest ethical standards across all aspects of our operations. This policy outlines our commitment to the principles of the Ethical Trading Initiative (ETI) Base Code, which ensures the fair treatment of workers, ethical sourcing, and respect for human rights throughout our supply chain. The purpose of this policy is to provide clear guidance to employees on our ethical responsibilities and to ensure that our business practices comply with the ETI Base Code and UK law.

2.0 SCOPE

This policy applies to all employees, contractors, suppliers, and partners working with or on behalf of O&S Doors Ltd. It covers all business operations, including manufacturing, supply chain management, and any third-party engagements. We expect all employees and suppliers to adhere to these principles as part of our shared commitment to ethical practices.

3.0 PRINCIPLES OF THE ETI BASE CODE

We fully align our operations with the ETI Base Code, which consists of the following core principles:

- **Employment is freely chosen**
There shall be no forced, bonded, or involuntary prison labour. Employees must work voluntarily and have the right to leave employment after reasonable notice.
- **Freedom of association and the right to collective bargaining**
All employees shall have the right to join or form trade unions of their choice and to bargain collectively without fear of discrimination.
- **Working conditions are safe and hygienic**
A safe and healthy working environment must be provided for all employees, ensuring the prevention of accidents and injuries. Adequate health and safety training and protective equipment shall be provided as necessary.

3.1 No Child Labour

Child labour shall not be used. We are committed to employing individuals who meet the legal minimum age requirements. Robust ID checks and verification processes will be enforced to prevent child labour in our business and supply chain.

3.2 Fair Wages & Benefits

Wages and benefits paid for a standard working week must meet, at a minimum, national legal standards or industry benchmarks. All employees shall receive clear information about their employment terms, including wage details.

3.3 No Excessive Working Hours

Working hours must comply with national laws, collective agreements, and international standards. Any overtime shall be voluntary and fairly compensated.

3.4 No Discrimination

We oppose any form of discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, sexual orientation, union membership, or political affiliation.

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3.5 Regular Employment

All work must be based on a recognised employment relationship established through national law and practice. Employment through agencies and temporary contracts must not be used to undermine workers' rights.

3.6 No Harsh or Inhumane Treatment

Physical abuse, verbal abuse, or any form of intimidation or harassment is strictly prohibited. All employees must be treated with dignity and respect.

4.0 RESPONSIBILITIES

4.1 Management

The Senior Management Team are responsible for ensuring that all aspects of the ETI Base Code are integrated into our business practices and that any non-compliance is addressed immediately.

4.2 Employees

Every employee must understand and comply with the principles of the ETI Base Code. Any concerns or suspected violations should be reported to the HR department or through our whistleblowing policy.

4.3 Suppliers and Contractors

Suppliers and contractors are required to comply with the ETI Base Code in their operations and throughout their supply chains. Regular audits and assessments may be conducted to ensure compliance.

5.0 REPORTING VIOLATIONS

Any employee or supplier who suspects a violation of this policy or the ETI Base Code should report it immediately to the HR department or use the company's confidential whistleblowing procedure. All reports will be treated seriously, investigated promptly, and handled confidentially.

6.0 Consequences of Non-Compliance


Non-compliance with this policy will result in disciplinary action for employees, which may include termination of employment. For suppliers and contractors, non-compliance could result in termination of contracts or business relationships.

7.0 Commitment to Ethical Trading

O&S Doors Ltd. recognise the need to communicate our commitment to key stakeholders including suppliers and the people who work with our suppliers. We seek to develop long term relationships with our suppliers who share our ethical standards. These relationships are always based on the principle of fair, open and honest dealings. Only suppliers that share our standards and can demonstrate compliance will be considered appropriate to trade with.

8.0 Improvement

O&S Doors Ltd. encourage and support continuous improvement in supplier standards and we regularly measure supplier improvement. We recognise our suppliers may need time and support to ensure compliance, however, all our suppliers must demonstrate that any breach of our ETC is addressed in appropriate timescales. Where we are alerted to breaches of our Ethical Trading Policy, we will take actions that are considered appropriate.

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We will work with suppliers to resolve ethical trading issues. If suppliers are unable or unwilling to address critical issues associated with any breach of our Ethical Trading Policy within the required timescales, we reserve the right to terminate the relationship in accordance with our contractual rights.

9.0 SUPPLIERS

O&S Doors Ltd. is committed to monitoring social standards in the supply chain, and the company encourages suppliers to operate to the same standards employed by O&S Doors Ltd. itself. The ethical trading practices of direct suppliers are initially monitored by self-assessment questionnaires, followed by Ethical Trading assessments of key suppliers as part of the O&S Doors Ltd. Supplier Approval Procedure.

The requirements outlines are in addition to applicable legislation. These requirements are in addition to our standard requirements for products supplied to be safe, legal and good quality.

All suppliers are required to comply in all respects with our code which is referenced in our supplier standard terms and conditions of purchase.

9.1 Suppliers Ethical Trading Code of Practice

Suppliers shall always comply with this code and with the applicable national and international laws, regulations, codes and standards, both in the country in which the supplier works and in the country in which the product and/or services are sourced/provided.

Suppliers shall ensure, as far as is reasonably practicable, that their own suppliers, agent(s), subcontractors and consultants, who are directly or indirectly involved in the provision of goods and/or services to O&S Doors Ltd. comply with the code of practice.

Suppliers shall ensure:

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

All major suppliers of O&S Doors Ltd will be asked to complete the company's Supplier Ethical Trading Questionnaire (IMS-FRM-177) to ensure that the supplier is operating with the legal framework applicable in the country of origin and that the supplier can meet the provisions set out in the relevant sections of the ETI (Ethical Trade Initiative) Base code.

9.2 Business Conduct with Suppliers

- We adopt the highest standard of integrity in all our business dealings and relationships.
- We understand and comply with our corporate responsibility and reject any business practice that might reasonably be deemed improper.

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- We will avoid any personal business or professional activity that could create a conflict between personal interests and the interest of our company.
- We promote positive supplier relationships through honesty and impartiality.
- Where commercially viable we support the sourcing of goods and materials from sources that are deemed to be environmentally friendly.
- We will conduct supply management in accordance with best practice.
- We respect complete confidentiality and expect this to be mutually binding.
- Personal relationships must not compromise purchasing best practice.
- We support the payment of goods and services in accordance with the agreed terms.

10.0 REVIEW & MONITORING

This policy will be reviewed annually or in response to changes in relevant legislation or ethical trading standards. Regular internal audits will be conducted to monitor compliance with the ETI Base Code.

11.0 ASSOCIATED DOCUMENTATION

IMS-FRM-177 - Supplier Ethical Trading Questionnaire

12.0 DOCUMENT HISTORY

Document No	Document Title	Revision No	Nature of change	Date
	Ethical Trading Policy	01	1 st Issue	13-Mar-2019
IMS-POL-023	Ethical Trading Policy	02	Issued to IMS	28-Apr-2025