



NOUGHTY CORPORATE SOCIAL RESPONSIBILITY POLICIES

At Noughty, we are committed to doing the right thing in all aspects of our business. This requires that every day, everyone working for us needs to have an unwavering dedication to the highest ethical standards. It is fundamental that every employee and worker carries a share of the responsibility for our conduct and contributes to our success.

Noughty have recently submitted its B-Corp assessment to ensure all policies that Noughty have put in place are measurable and continuous improvements are made.

Our culture is built on four key values. These shape our behaviour toward customers and toward one another. Together, they drive our organisation forward. The values are:

INTEGRITY

We demand of each other and ourselves the highest standards of individual and corporate integrity. We do the right thing, because it is the right thing to do. It is every employee's responsibility to safeguard organisation assets and foster an environment of trust with our workers, customers, communities and suppliers. We should always comply with all our organisation policies, meet legal requirements, and create an environment of transparency in which all reporting requirements are met.

EXCELLENCE

We routinely challenge ourselves to improve our products, services and processes. We strive always to understand our customers' businesses and help them achieve their goals. We serve our customers by anticipating and responding to their needs. We are dedicated to diversity, fair treatment, mutual respect and trust. We are committed to producing products and serving our customers with zero harm to people and the environment.

TEAMWORK

We foster an environment that encourages innovation and creativity, and delivers results through collaboration. We practice leadership that teaches, inspires and promotes full participation and career development. We encourage open and effective communications and interaction with all workers and stakeholders, actively working together to keep each other safe and in good health. We believe that none of us is as capable or effective as all of us – and together, there's no limit to what we can achieve.

ACCOUNTABILITY

We honour the commitments we make and take personal responsibility for all actions and results. Our actions match our words, and we demand responsibility – from ourselves and others – in everything we do. We operate on the basis that continuous improvement is an integral part of our culture.

Regardless of our position within Noughty, we share equal accountability for:

- Conducting business with integrity, preserving our strong reputation and expanding our position in the marketplace.
- Fostering an inclusive culture in which we all feel respected and have the opportunity to reach our full potential.
- Providing a healthy and safe work environment, and complying with applicable environmental laws and regulations wherever we operate around the world contributing to the sustainability of the communities in which we live and work.

Noughty Ethical Policy is aligned to the Ethical Trading Initiative (ETI) Base Code which reflects national labour laws and the most relevant international standards with respect to labour practices. It is a contractual obligation for Noughty that all Suppliers shall meet these agreed ethical standards and that performance in this regard is measured, transparent and ultimately a precondition to further business. Noughty acknowledges that the observance of some provisions in the Base Code may not be immediately realisable in all cases. Some Suppliers may be unable to meet all the terms within a short time or, in some cases, they may be constrained by national law. Reasonable timeframes and the existence of any constraints not controllable by the Supplier may be taken into account. This Policy is a fundamental term of all orders placed by Noughty and failures to observe these standards will require rapid corrective action for Noughty to continue any business relationship with the Supplier concerned. By appointment and without prior announcement, the Supplier will permit at all reasonable times access to all production facilities by Noughty employees or appointed agents, for the purpose of ensuring compliance with this Policy.

2.1 The ETI Base Code

1. EMPLOYMENT IS FREELY CHOSEN

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The supplier adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the supplier facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The supplier shall assign responsibility for health and safety to a senior management representative.

4. CHILD LABOUR SHALL NOT BE USED

4.1 There shall be no new recruitment of child labour.

4.2 Suppliers shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. LIVING WAGES ARE PAID

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. WORKING HOURS ARE NOT EXCESSIVE

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

7. NO DISCRIMINATION IS PRACTISED

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. REGULAR EMPLOYMENT IS PROVIDED

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. NO HARSH OR INHUMANE TREATMENT IS ALLOWED

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent Suppliers from exceeding these standards.

2.2 Anti-Bribery Policy

A) INTRODUCTION

Bribery is, in the conduct of Noughty business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. Noughty prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Noughty employees or by third parties acting for or on behalf of Noughty.

B) OFFENCES

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official;
- as a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. Noughty could also face prosecution and be liable to pay a fine.

C) PURPOSE

The purpose of this policy is to convey to all employees and interested parties of Noughty the rules of Noughty in relation to our unequivocal stance towards bribery and our commitment to ensuring that Noughty conducts its business in a fair, professional and legal manner.

D) DEFINITIONS OF BRIBERY AND CORRUPTION

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business:

- Giving or receiving money, gifts, meals, entertainment or anything else of value.
- As an inducement to a person to do something which is dishonest or illegal.

E) SCOPE

This policy applies to all employees of Noughty, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

F) POLICY

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or organisation in order to gain commercial, contractual or regulatory advantage for Noughty, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact the HR Manager so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to the HR Manager. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

Noughty will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Noughty takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of Noughty' Whistleblowing Policy which is available in the Employee Handbook, or upon request.

G) GIFTS AND HOSPITALITY

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from the CEO. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from the CEO.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and Noughty reserves the right to amend this policy without prior notice.

2.3 Noughty Anti-Slavery and Human Trafficking Policy

1. WHAT IS MODERN SLAVERY?

1.1 Slavery, in accordance with the UK's 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Modern slavery takes various forms all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain including:

1.1.1 Forced labour - is defined in international law by the ILO's Forced Labour Convention 29 and 2014 Protocol. It involves coercion, whether by direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily;

1.1.2 Debt bondage - victims are forced to work to pay off debts that realistically they will never be able to fulfil. Low wages and increased debts mean not only that they cannot ever hope to pay off the loan, but the debt may be passed down to their children.

1.1.3 Sexual exploitation - Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Whilst women and children make up the majority of victims, men can also be affected. Adults are coerced often under the threat of force, or another penalty.

1.1.4 Criminal exploitation - Victims are forced into crimes such as cannabis cultivation or pick pocketing against their will.

1.1.5 Domestic servitude - Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work.

1.1.6 Human trafficking is the arrangement or facilitation of the travel of another person, either across borders or within a single country, with a view to that person's sexual or non-sexual exploitation.

2. SCOPE OF POLICY

2.1 This policy sets out Noughty's commitment to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. It applies to all of our business units, operations, functions, and staff, including but not limited to legal entities, acquisitions, disposals, outsourcing arrangements, new products, new asset classes and strategic projects.

3.2 We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we expect our suppliers to comply with all of Noughty's Compliance Policies and we expect that our suppliers and subcontractors will hold their own suppliers to the same high standards.

3.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

4.2 Our approach to modern slavery and human trafficking shall be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

2.4 Child Labour

Noughty will ensure that all relevant legislation and restrictions are adhered to with regards to the use of young workers. We will ensure that the necessary checks are carried out to verify an individual's age and right to work, and that relevant Health and Safety codes are adhered to.

Where required, Noughty will ensure that the relevant employment permit is received from the education department of the local council.

We will also carry out spot checks when required and will retain copies of age records within the place of work.

RESTRICTIONS FOR CHILDREN AGED 14 YEARS OLD

There are restrictions that apply to the employment of children aged 14 years old, as follows:-

- You must not work before 7.00 am. or after 7.00 pm. on any school day.
- You must not work for more than 2 hours on any day when you are required to be at school.

- You must not work during school hours.
- You must not work for more than 5 hours on a Saturday or on weekdays during school holidays.
- You must not work for more than 2 hours on a Sunday.
- You must not work for more than 4 hours in any day without a rest break of 1 hour.
- You must not work for more than 12 hours in any school week; and
- You must not work for more than 25 hours a week during school holidays.

RESTRICTIONS FOR CHILDREN AGED 15 AND 16 YEARS OLD

There are restrictions that apply to the employment of children aged 15 and 16 years old, as follows:-

- You must not work before 7.00 am. or after 7.00 pm. on any school day.
- You must not work for more than 2 hours on any day when you are required to be at school.
- You must not work during school hours.
- You must not work for more than 8 hours on a Saturday or on weekdays during school holidays.
- You must not work for more than 2 hours on a Sunday.
- You must not work for more than 4 hours in any day without a rest break of 1 hour.
- You must not work for more than 12 hours in any school week; and
- You must not work for more than 35 hours a week during school holidays.

RESTRICTIONS FOR YOUNG WORKERS OVER COMPULSORY SCHOOL LEAVERS AGE

There are restrictions that apply to the employment of young workers over compulsory school leaver's age, as follows:-

- You must not work for more than 8 hours a day.
- You must not work for more than 40 hours a week.
- You must not work for more than 4.5 hours in any day without a rest break of 30 minutes.
- You must have a rest period of not less than 48 hours in each seven-day period

NOUGHTY ENVIRONMENTAL POLICY

3. Environmental Policy

Noughty is committed to a policy of sound environmental management on its own account and in partnership with clients, designers and other contractors. Our principle goal is to prevent harm to people and damage to the environment or property.

This commitment is driven at all levels of Noughty and we devote time and resources to evaluating and reducing the effects that our work may have on the local environment.

We aim to:

- Establish and maintain working procedures that are environmentally sound.
- Fully integrate these procedures as essential elements of our business.
- Assess the environmental impact of all new works before they start and during their progress.
- Be efficient in the consumption of energy and natural resources, and where possible ensure that materials used can be reduced, recycled, reused, or disposed of safely.
- Make our clients aware of alternative approaches to their projects or changes in materials that would be of greater environmental benefit than those specified.
- Keep abreast of product and procedural developments so that we can continually improve our approach to environmental issues and our environmental footprint.
- Promote the adoption of these principles by any sub-contractors.
- Have emergency procedures that take account of environmental spills and releases, which indicate those that should be reported to the authorities.
- Educate, train and motivate our employees to conduct their activities in an environmentally responsible manner in accordance with this policy.
- Establish the shipment method of inbound freight or shipping and use the lowest environmental impact route.
- Only use vehicles that comply with the latest EC emission and noise specification.
- Control, monitor and reduce the fuel consumption and emission levels of all vehicles used to transport Noughty goods. Give due consideration to alternative fuels.

Our Product Director has been appointed to take charge of environmental issues for Noughty. They are responsible for auditing against this policy and for its regular review.