

# Our responsibility framework

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DESIGN

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FURNITURE



OCEE INTERNATIONAL  
GROUP COMPANIES

Our Responsibility Framework  
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The Ocee International trading companies create multipurpose, problem-solving, and comfortable furniture – for many types of business. While each company has its own personality based upon its heritage, design style, products, and audience, they share the same values. We believe that the combination of unrivalled functionality, ingenious design, and a dose of wonder, turns good spaces into great experiences.

Our Responsibility Framework contains the policies that guide our approach to doing business, reflecting our commitment to responsibility, integrity, and excellence. It encompasses everything from ethical conduct to regulatory compliance and aims to manage risks, resolve conflicts, promote our values, enhance efficiency, and foster transparency and accountability

- Sustainability policy statement
- Environmental policy statement
- Quality policy statement
- Sustainable & ethical procurement statement
- Modern slavery & human trafficking policy statement
- Core labour policy statement
- Health & safety policy statement
- Equal opportunities & diversity policy statement
- Anti-harassment & bullying policy statement
- Anti-bribery, fraud, & anti-corruption policy statement
- Whistle blower policy statement
- GDPR policy statement

Our policies address the Ten Principles of the UN Global Compact, in the four main categories: human rights, labour, environment and anti-corruption.

# A message from our CEO

As we continue to grow, so does our impact on the world. We understand the huge responsibility we have as an international group, and Our Responsibility Framework aims to highlight how we are supporting good, ethical business.

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



Alistair Gough  
**Group CEO**

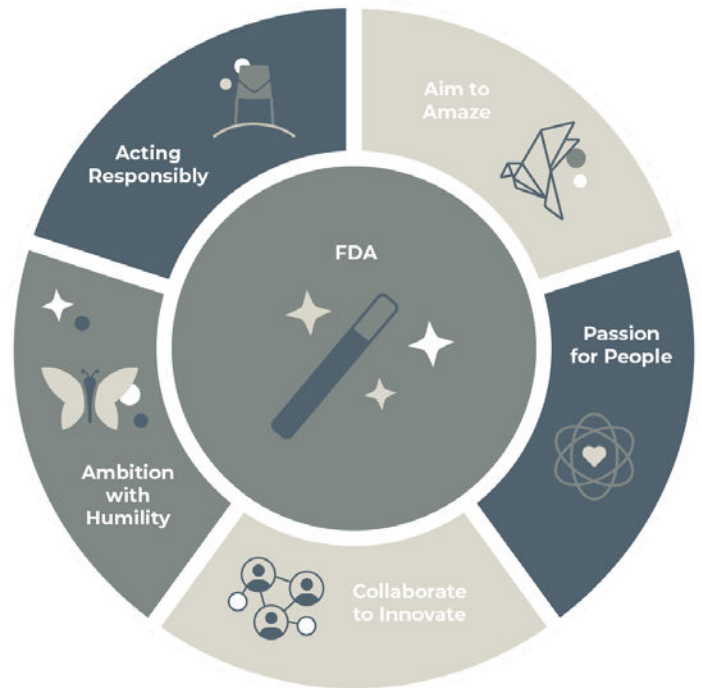
A handwritten signature in black ink, appearing to read 'AG', positioned below the printed name and title.

# Business Ethics

We believe that a successful and winning company culture is built on strong values. We have worked closely with our employees to form five key values that guide all our internal and external activities.

It starts with our unique FDA: Function, Design and Aha moments! We believe our unique design philosophy creates unrivalled functionality, ingenious design and a healthy dose of wonder that helps to enrich and inspire the lives of our customers, end-users, and employees.

Spot the icons throughout the document to show how the policies link into the way we act as an organisation.



## Passion for people

We have a true passion for everyone around us. We will recruit individuals who share our culture and values; that we believe will continue to enrich our community. We believe that sharing knowledge, having fun, and socialising together is central to our success.



## Acting responsibly

In everything we do, there should be consideration for people, the planet and financial security. Collectively, as an international company, we are committed to acting responsibly, celebrating diversity, and promoting sustainability. We know every single local effort contributes to the wider global impact.



## Aim to amaze

Going the extra mile to amaze our customers is in our nature; it is not an aim. We hope to inspire customer loyalty through our service, our people, and their experiences.



## Ambition with humility

We continually seek ways to embrace change, grow and strengthen our business and international family. We do so with humility and consideration for everyone associated with the company.



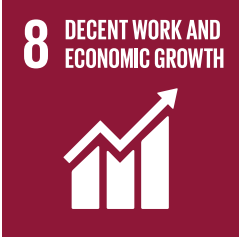
## Collaborate to innovate

Our international family is full of passionate, bright, knowledgeable, talented individuals, with different heritage and experiences. The collaboration of these brilliant minds allows for true innovation.

# Sustainability policy statement

To create a future where the environment and everyone can thrive, organisations must consider principles beyond financial gain. Acting responsibly is a core value that guides the actions of our trading companies. By optimising resources, empowering our employees, and investing in the future, we pave the way for sustainable growth and prosperity for all.

Our sustainability efforts are guided by the UN Sustainable Development Goals, which align our actions with global priorities and ensure contribution towards a more sustainable world.



Our trading companies translate those long-term ambitions into their business strategy and create clear objectives with measurable targets.

Further information can be found in the Sustainability sections on their respective websites.



# Environmental policy statement

Environmental management is key in how we operate. Our trading companies all uphold ISO 14001:2015 certified environmental management systems, guiding our actions and ensuring compliance to relevant legislation. Our aim is to employ the best practices possible, whilst continually reducing our impact on the environment.

We recognise our environmental duties under the Environmental Protection Act 1990 and the Waste (England and Wales) (Amendment) Regulations 2012. We recognise that we have a responsibility to take an environmentally and socially responsible approach both to existing activities and to possible new developments.

## **We pay particular attention to:**

- Minimising disturbance to the local and global environment, and to the local communities and wildlife.
- Minimising the use of energy and raw materials to lower resource consumption.
- Following the waste management hierarchy as outlined in the Waste (England and Wales) (Amendment) Regulations 2012.

We will follow the hierarchy outlined below for waste generated:

- Prevention
  - Preparing for re-use
  - Recycling
  - Recovery
  - Disposal
- Considering the environment in the design of processes and products and the maintenance of equipment.
  - Minimising the use of product-related materials and services, such as packaging or transport.
  - Providing information on the use and final disposal of products.
  - Impact of all direct and indirect business operations on the climate.



To achieve our objectives, we ensure that employees recognise their duty at work to take reasonable care of the environment. We engage with our suppliers to ensure they are informed about our Environmental Policy and contribute to creating positive impacts.

# Quality policy statement

Quality management is embedded in our culture and fundamental to our success. Our quality management system is ISO 9001:2015 certified, consistently providing products and services that meet or exceed industry standards and regulatory requirements, striving to exceed customer expectations.

To fulfil this commitment, we adhere to the following principles:

- **Customer focus:** We prioritise customer satisfaction by understanding and exceeding their needs, preferences, and expectations. We actively seek feedback to continually improve our products and services.
- **Continuous improvement:** We commit to ongoing enhancement in all areas of our operations. Regular reviews and upgrades optimise efficiency, minimise waste, and enhance product quality.
- **Quality control:** We maintain stringent quality control measures throughout the manufacturing process to ensure the highest standards of craftsmanship, durability, and safety. Our control procedures cover raw material inspection, production monitoring, and final product inspection.
- **Supplier relationships:** We partner with reputable suppliers who share our commitment to quality and sustainability. Close partnerships maintain supply chain integrity and product quality.
- **Employee empowerment:** We empower employees to uphold quality standards at every stage. Training and resources enable team members to identify improvement opportunities and implement effective quality controls.
- **Compliance and certification:** We adhere to relevant industry standards, regulations, and certifications, ensuring product quality, safety, and environmental sustainability. Continuous monitoring and process updates maintain compliance.
- **Transparency and accountability:** We maintain transparency and accountability in our quality management. Open communication and regular reporting on our quality performance, including key metrics and achievements, demonstrate our commitment to stakeholders.



# Sustainable & ethical procurement statement

We recognise the impact that our procurement decisions can have on the environment, society, and the well-being of future generations. We are committed to conducting our procurement activities in a manner that reflect our dedication to sustainability, social responsibility, and ethical business practices.

## Supplier selection and evaluation

- We prioritise suppliers who demonstrate a commitment to sustainability, including environmentally friendly practices, social responsibility, and ethical labour standards.
- We seek to establish long-term partnerships with suppliers who share our values and are willing to collaborate on sustainable solutions.
- Before engaging with suppliers, we conduct thorough assessments to evaluate their environmental performance, labour practices, and compliance with relevant regulations and standards.

## Sustainable sourcing

- We give preference to suppliers who offer products and materials that meet our sustainability criteria, such as certified wood, recycled materials, and low-emission finishes.
- We actively seek out suppliers who prioritise sustainability throughout their own supply chains, from raw material sourcing to production and distribution.
- We encourage innovation in product design and manufacturing processes to minimise environmental impact and promote resource efficiency.
- We prioritise sourcing timber products from suppliers who adhere to recognised forestry certification standards. We will not source timber products from suppliers associated with illegal logging, deforestation, or other environmentally harmful practices.

## Transparency and traceability

- We require transparency from our suppliers regarding the origin of materials, production methods, and supply chain practices.
- We strive to establish traceability mechanisms that enable us to track the journey of materials and products from source to final destination, ensuring accountability.

## Social responsibility

- We expect our suppliers to uphold fundamental human rights, fair labour practices, and safe working conditions for all employees.

## Continuous improvement

- We are committed to continuous improvement in our procurement practices, regularly evaluating our performance.
- We actively seek feedback from stakeholders, including employees, customers, suppliers, and community members, to identify areas for improvement and innovation.





# Modern slavery & human trafficking policy statement

We are committed to preventing modern slavery and human trafficking in all aspects of our business operations and supply chain and complying with the provisions in the Modern Slavery Act 2015.

We will not enter business with any organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

We take all necessary steps to ensure that such practices do not take place in our businesses nor the business of any organisation that supplies goods and/or services to us.

No labour provided to our businesses in the pursuance of the provision of their own services is obtained by means of slavery or human trafficking. Our trading companies strictly adhere to the minimum standards required in relation to their responsibilities under relevant employment legislation.

All employment relationships with the company are voluntary and based on mutual consent, without the threat of a penalty.



# Core labour policy statement

Ocee International commits to give full and due consideration to worker rights and obligations established by national and local laws, while at the same time fulfilling the objectives of the requirements of applicable standards to which the company is obligated.

## Social responsibility

Ocee International is committed to the ILO and Ethical Trading Initiative (ETI) codes of conduct and as part of that commitment shall not use or employ any form of child labour of compulsory school age. Any person under the age of 18 who are legally employed by Ocee International or its trading companies will be subject to a specific under 18's risk assessment. No person under the age of 18 will be employed in work that impacts their health, including hazardous or heavy work. The risk assessment process shall ensure this is the case.

## Discrimination

In compliance with the Equality Act 2010, the company is committed to ensuring there is no unfair discrimination in employment or occupation and practices adopted are non-discriminatory.

This is explained in more detail in the full policy which sits alongside our Equality & Diversity, Bullying & Harassment and Recruitment and Selection Policies.

## Freedom of association and collective bargaining

Employees can raise concerns as individuals or collectively and can consult with management or HR on any employment matters including terms and conditions of employment. As such, no formal union or other employee representative currently exists within the companies in the UK. However, employees do have the freedom of association and the effective right to

collective bargaining including through trade unions, which under National law, employees are free to establish or join. The company further commits to respect the full freedom of workers' representative body or union to draw up their constitutions and rules and also the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organisation, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.

In Denmark, trade unions play an important role in the workplace and we abide by the Industrial Employees' Collective Agreement.

## Community impact

Our organisation is keen to support and become involved in community initiatives and charitable work. We do this in the form of sponsorship, donations to national and local charities which may be suggested by our staff, and the funding of community projects. Every suggestion is given due consideration.

We recognise the importance of education in our community and supporting individuals during this process is key to advancement. We actively encourage our employees to take up training courses funded by ourselves, and we offer several work experience placements in partnership with local colleges.



# Health & safety policy statement

The health and safety of our employees is of the utmost importance. Ocee International recognises its health and safety duties under the Health and Safety at Work Act 1974, the Management of Health & Safety at Work Regulations 1999 and accompanying protective legislation. We take the necessary steps to ensure that all reasonable precautions are taken to provide and maintain working conditions which are safe, healthy and comply with all statutory requirements and codes of practice.

**Our trading companies, so far as is reasonably practicable, proposes to pay particular attention to:**

- The provision and maintenance of a safe place of work, a safe system of work, safe appliances for work, and a safe and healthy working environment.
- The provision of such information and instruction as may be necessary to ensure the health and safety of its employees and others, and the promotion of awareness and understanding of health and safety throughout the workforce.
- Ensuring the safety and absence of health risks in connection with use, handling, storage and transport of all articles, substances, and equipment
- Making regular assessments of risks to employees.
- Taking appropriate preventative/protective measures as identified by risk assessment.



# Equal opportunities & diversity policy statement

We are committed to providing an environment of equal opportunities for all members of our workforce. No account of any of the protected characteristics set out in the Equality Act 2010 shall be taken to a detrimental effect in any decision involving recruitment, promotion or in the provision of facilities or employment. All practices adopted are non-discriminatory.

This is explained in more detail in the full equal opportunities policy.



# Antiharassment & bullying policy statement

We have a zero-tolerance policy to harassment and bullying. We strive to create a safe place of work for all employees, aiming to ensure that everyone is treated with respect and dignity, free from harassment, intimidation, and other forms of bullying within the workplace. This covers every individual working with us irrespective of their position.



# Anti-bribery, fraud, & anti-collusion policy statement

Ocee International is committed to conducting 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. All these stakeholders have responsibility to prevent, detect and report cases of bribery and collusion. We have procedures in place that prevent bribery by people who are associated with our organisation. Ocee International recognises that hospitality, events, and gifts feature in the work of our external sales team. To ensure we are not subjected to bribery or collusion, any hospitality exceeding £500 must be declared to our Sales Director.



# Whistle blower policy statement

We are dedicated to creating a workplace of trust and openness, one that protects employees. In accordance with the Employment Rights Act 1996, and the EU Whistleblowing Directive, our whistleblower policy exists 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.

All employees are protected under our Whistleblower Policy, of which all cases will be dealt with the upmost confidentiality. This is explained in more detail in the full policy.



# GDPR policy statement

Our GDPR policy outlines our obligations to collection, processing, transfer, storage, retention, and disposal of personal data. This procedure is adhered to by all our companies and any stakeholders who work on their behalf. Any personal data breaches must be reported immediately to our Data Protection Contact and dealt with accordingly.

All personal data obtained and held by our companies will:

- be processed fairly, lawfully and in a transparent manner
- be collected for specific, explicit, and legitimate purposes
- be adequate, relevant and limited to what is necessary for the purposes of processing
- be kept accurate and up to date. Every reasonable effort will be made to ensure that inaccurate data is rectified or erased without delay
- not be kept for longer than is necessary for its given purpose
- be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisational measures
- comply with the relevant data protection procedures for international transferring of personal data.



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