

OT Group Limited

Part of Paragon Group

Business Ethics Policy

Our values and ethics are embedded in our business.

This document sets out our Ethical Policy and marks our continued commitment to the values that underpin it.

OT Group values

Our vision is to offer 100% service excellence for customers. By putting customers at the heart of everything we do, and operating sustainably and responsibly, we believe we will create long-term benefits for our business, customers and local communities.

- Empowered – Take responsibility and ensure our actions are in-line with company goals.
- Sincere – We act with integrity and believe in what we do.
- Passionate – Work hard to build relationship and develop trust and loyalty.
- Sustainable – We're committed to doing business in a way that allows our customers, the communities we work in and the planet to thrive.
- Innovative – Share knowledge and learn from each other.
- Collaborative – We value openness and proactively work in partnership with our colleagues and customers to deliver genuine customer satisfaction to the highest standards.

Working responsibly and with integrity

At all times the Company and its employees will demonstrate the highest levels of integrity, truthfulness and honesty in order to uphold both personal and corporate reputations and inspire confidence and trust in their actions. OT Group will conduct its business in a competent, fair, impartial and efficient manner. We will maintain this standard of behaviour and performance in our dealings with colleagues, customers, suppliers and all other stakeholders.

Human Rights

At OT Group we are committed to protecting the human rights of all our colleagues and of everyone who receives direct or indirect services from us. As a responsible, ethical organisation, we fully support the principles of the Human Rights Act and all associated legislation.

- We will not employ workers under the legal minimum age for work as stipulated by the Employment Act 2008.
- We will not make use of any forced labour or debt-bondage labour in accordance with the Modern Slavery Act 2015.
- We will not discriminate against any person based on their protected characteristics, and will uphold Article 14 of the Human Rights Act 1998 in respect of protection from discrimination.

Building a great company for our colleagues

We treat all our colleagues with dignity and respect and ensure equal employment opportunities are given to all irrespective of their race, religion, gender, sexual orientation, maternity, marital status, family status, disability, age or national origin. Employees are offered a safe and healthy workplace and the Company will not tolerate any form of harassment.

Everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions.

Health and Safety

OT Group is committed to providing a safe and healthy working environment for all of its employees both on and off its sites. This is backed up by a programme of regular health and safety audits and regular health and safety training to our colleagues.

Our Health and Safety standards apply to all visitors our sites.

Warehouse Safety

We ensure that our warehouses are laid out and equipped appropriately and our workforce is trained to minimise risks from manual handling, as well as ensuring good housekeeping to reduce the risks of trips, slips and injury from falling objects.

Personal Responsibility

Each employee is expected to ensure that his/her conduct does not place their personal safety or the safety of others in jeopardy. This requires an active participation in maintaining a safe working environment and includes observance of established safety procedures and making recommendations for changes where they are needed. In all circumstances, including when travelling on Company business, each employee is expected to conduct himself/herself in a professional and responsible manner.

Environment

OT Group respects the environment and the communities in which our business impacts. We have a responsibility to protect it and minimise the impact our operations have on it. We continue to look at ways we can improve on environmental issues, which is brought to life through our sustainability agenda and supported by a set of environmental and social initiatives, designed to deliver ongoing benefits for our business, our customers and our local communities.

Sustainability agenda - Area and objectives

Local Projects - Support local communities through our staff volunteering programme and work placement opportunities.

Carbon Emissions - Continue to investigate new ways to reduce our carbon emissions.

Local Communities - Support local schools, charities and organisations with essential product donations, preserving their funding and facilitating learning and valuable services.

Internal Initiatives - Create change internally by regularly re-evaluating our working practices to ensure we minimise the impact of our activities on the environment.

Global Initiatives - Support global initiatives through our product supply and logistics operations.

Sustainable products- Create and supply an extensive range of environmental products for our customers to discover and use.

100% renewable energy - We're proud to use 100% renewable electricity, generated from offshore wind farms across the coasts of the UK. This commitment delivers an estimated 840 tonne reduction in CO2 emissions per annum.

Customers

The Company will seek to build long term partnerships with its customers by being honest and straightforward in its dealings at all times. It will respect the confidentiality of any information it may obtain in relation to its customers.

Suppliers and Partners

We select suppliers who have honest credentials, respect human ethics, labour rights, health and safety regulations and legal compliance. This includes undertaking regular reviews, including factory inspections to ensure recognised standards and regulations are fully adhered to.

Competitors

OT Group is dedicated to ethical, fair and vigorous competition. We will continue to build our reputation on the basis of our performance alone. We will compete vigorously and lawfully but not unfairly with others. OT Group will not seek to damage the reputation of our competitors either directly or by implication.

Government, Regulators and Legislators

OT Group will continue to comply with all international, national and local legislation that affects our business. We will meet all of our tax obligations and will not make any financial contributions or offer support to any political party. OT Group will continue to strive to follow the best practice in corporate governance.

Giving and Receiving Gifts and Entertainment

Employees will neither seek nor accept for themselves or others any gifts, favours or entertainment without a legitimate purpose from any person or business organisation that does or seeks to do business with. Gifts, favours and entertainment received or given has to have a clear business reason and not just be for the employee's or their family's personal benefit.

Bribes and Corrupt Practice

OT Group is committed to the highest standards of ethical conduct and integrity in its business activities. Every employee and associated person acting for, or on behalf of, OT Group is responsible for maintaining the highest standards of business conduct. We will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent,

monitor and eliminate bribery. We have a separate Bribery Policy, in accordance with the Bribery Act 2010 which came into force on 1st July 2011.

Company employees must avoid involvement in any situation which might lead to the offer of bribes. The policy makes it clear that any employee found to be involved in any kind of corrupt practice is likely to be immediately dismissed and may well have committed a criminal act which could lead to prosecution.