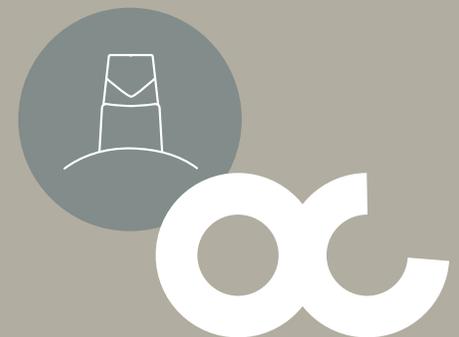


Our corporate social responsibility policy



Our corporate social responsibility policy

As a growing organisation, we know the importance of sustainable growth. In addition to our Quality and Environmental Management Systems, we have adopted a sustainability strategy aligned to our company values and direction, considering the social, environmental and economic impact of the international group. This document aims to outline the promises and actions of Ocee International's Corporate Social Responsibility.

By incorporating the UN Sustainable Development Goals into our company operations, we strive to employ the best practices possible and prove our commitment to sustainability; working towards something bigger. The United Nations Sustainable Development Goals set out goals for countries to achieve. In today's day and age, companies hold just as much responsibility as governments do. So, we believe that incorporating these global goals into our local actions, means we can help in this movement towards a more sustainable world.

This Corporate Social Responsibility Policy is made up of a variety of policy statements addressing the UN Global Compact 10 Principles, in the four main categories; Human Rights, Labour, Environment and Anti-Corruption. It also addresses the policies required within our ISO14001:2015 and ISO9001:2015 certificates.

- o Sustainability Policy
- o Environmental Policy
- o Quality Policy
- o Health and Safety Policy
- o Modern Slavery and Human Trafficking Policy Statement
- o Ethical Procurement Policy Statement
- o Equal Opportunities and Diversity Policy Statement
- o Anti-Harassment and Bullying Policy Statement
- o Whistle Blower Policy Statement
- o Anti-bribery, Fraud and Anti-corruption Policy Statement
- o GDPR Policy Statement



A message from our CEO...

At Ocee International, as we continue to grow, we understand that we may have a bigger impact on the world. Our sustainability strategy, based on the UN Sustainable Development Goals, aims to minimise any negative impact, and continue to strengthen the positive impact we have on society and the environment.

We view society as everyone from our employees to our customers, our suppliers, as well as our local and global communities. We understand the huge responsibility we have as an international company, and this Corporate Social Responsibility Policy aims to highlight how we will support good, ethical business.

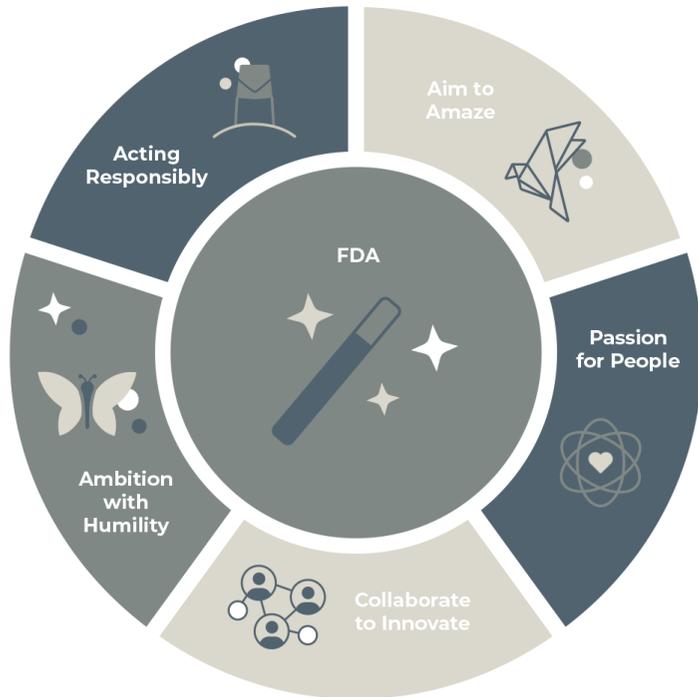
Please join us in working towards a more sustainable furniture industry.

Alistair Gough
Group CEO

"Turning good environments into great experiences"



How we interpret these policies in our company using our internal values

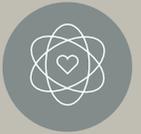


Our internal values are what we pride ourselves on as a company. These values help us achieve our purpose of **turning good environments into great experiences.**

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.



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.



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.



FDA (Function, Design and Aha moments)

Function, Design and Aha moments! We believe our fundamental principle 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.



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.



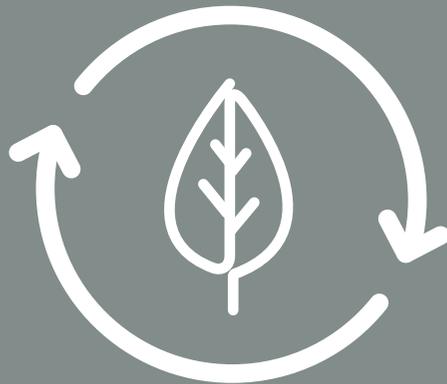
Acting Responsibly

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.



Our sustainability policy statement

Ocee International is committed to making the responsible choice. We understand that our future development is dependent on our actions; and to sustain growth we must invest in the social and environmental aspects of our organisation. Using the UN Sustainable Development Goals to focus our efforts, we hope our corporate sustainability actions will contribute to something bigger. The goals we believe we can make the most significant impact with are:



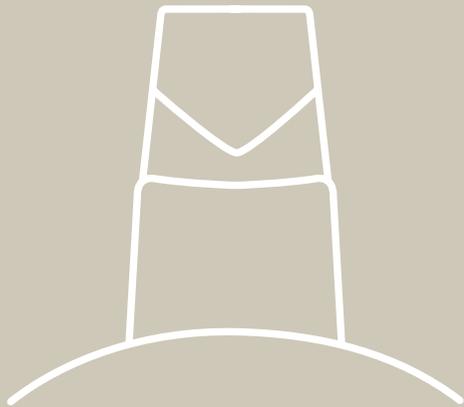
Our Group Sustainability Promises

1. Ensure the highest possible environmental standards are achieved
2. Guarantee responsible procurement and an ethical supply chain
3. Develop and maintain high material transparency to enable sustainable consumption
4. Innovate sustainable product design which not only enables customers to reduce their environmental impact but also endeavours to provide solutions for the local and global challenges of today
5. Continue to reduce our environmental impact according to technological possibilities
6. Be recognised for positively contributing to society and the environment

For further information on how we will achieve these goals, please visit the Responsibility section of our website.



Our environmental policy statement

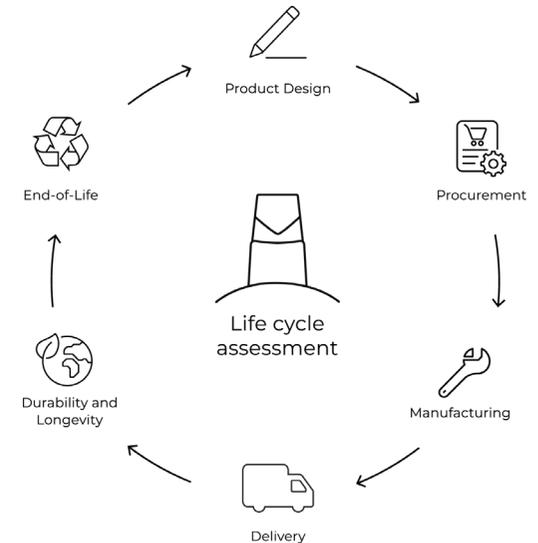


Environmental management is a key component in how we operate business at Ocee International. Our overall aim is to employ the best practices possible, whilst continually reducing our impact on the surrounding environment, both locally and globally.

We understand that our responsibility to the environment goes beyond just our manufacturing sites and that our impact from procurement and product release to customers is part of the wider picture.

Using the life-cycle perspective, we have identified environmental aspects in every part of the company. We aim to address the most significant aspects which could have the biggest impact on the environment. These include:

- o Energy consumption
- o Waste
- o Packaging
- o Company travel
- o Procurement of sustainable materials
- o Product design and sustainability



We want to engage all employees

with our environmental efforts, helping them understand the impact they have within their department.

Our group ISO14001:2015 Environmental Management certification helps guide our environmental performance by ensuring compliance to relevant legislation, by assessing risks, by setting objectives to monitor against, with the aim to continually improve year-on-year.



Our sustainable & ethical procurement policy statement



Responsible procurement is an essential part of Ocee International's efforts towards the Sustainable Development Goals and the importance of both social and environmental factors to consider when purchasing materials.

Our timber is procured from responsible suppliers who source from sustainably managed forests, ensuring we are only involved in legal logging from sites that follow replanting schemes to ensure the material is renewable and sustainable. We ensure that timber is compliant with the EU and UK Timber Regulations; and conduct a group self-assessment of the company against the FSC Core Labour Standards. We aim to increase the proportion of certified wood used in our products to increase the traceability of supply.

We understand that our purchasing power effects many actions throughout our supply chain. We have reasonable lead times to ensure pressure isn't set upon our suppliers meaning they must outsource work to companies that may not have work conditions compliant with our policy.

We will in fact use this purchasing power to encourage suppliers to become more sustainable by:

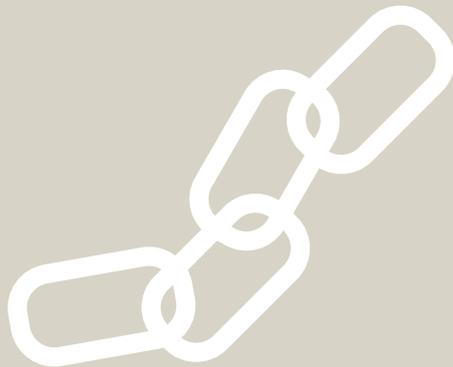
- o matching our high environmental standards
- o ensuring material transparency
- o proving compliancy to our Supplier Code of Conduct mentioning Labour, Human Rights, Working Conditions and the Environment

Our Supplier Code of Conduct document highlights these expectations, which is communicated to every supplier at the start of the contract and is available for all stakeholders upon request. We expect our suppliers to be compliant and require verification of policies to go forward with the contract. This is just one step we take to ensure an ethical supply chain.

Annually we will conduct a supplier review which expands on our Code of Conduct to give our suppliers the opportunity to show us their sustainability efforts and conformance. Using an internal scoring system we will benchmark our suppliers year-on-year to guide their continual improvement and ensure a good ongoing working relationship.



Our modern slavery and human trafficking policy statement



We acknowledge our international responsibility under the UK Modern Slavery Act 2015 and commit full support to protecting international human rights. We will drive out acts of modern-day slavery and human trafficking within our business and from within our supply chains, including subcontractors and partners.

The company will not support or deal with any business knowingly involved in modern slavery, including but not limited to slavery, servitude, human trafficking and forced labour.

Modern day complex global supply chains which lack transparency, have the possibility of hiding cases of forced labour and slavery. Our responsibility as an international organisation is to alleviate these possibilities. As part of the company's due diligence processes into slavery and human trafficking, the supplier approval process will include a review of the controls undertaken by the supplier. Our Supplier Code of Conduct outlines the expectations we have of our suppliers, including human rights, conditions of employment, and labour. As outlined in the ethical purchasing policy statement, our annual supplier questionnaire looks to compliancy throughout our supply chain.

This policy and the Modern Slavery Act 2015 will be accessible to all employees electronically. The Company Directors and senior management team shall take responsibility for implementing this policy and its objectives and shall provide adequate resources and investment to eradicate any possibilities of modern slavery within the organisation and associated supply chain.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. We ensure that this policy is understood and communicated to all levels of the Company, and that it is regularly reviewed by the Directors to ensure its continuing stability and relevance to the Company activities.



Our anti-bribery, fraud and anti-collusion policy statement



Ocee International is committed to conducting all our 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.

Bribery is ...

- o giving/promising a financial or advantageous offering to another party with the intent of the other party performing misconduct
- o requesting/accepting a financial or advantageous offering from another party with the intent of the other party performing misconduct

Collusion is...

- o an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party

Ocee International recognises that hospitality, events and gifts feature in the work of our external sales team. To ensure that we are not subjected to bribery or collusion, all gifts with a commercial value of over £50 and any hospitality exceeding £500 must be declared to our Sales Director.

All stakeholders mentioned have responsibility to prevent, detect and report cases of bribery and collusion. All relevant cases will be handled in accordance to our Whistleblowing Policy. Any non-employees who wish to voice a concern should contact their normal point of contact within the Company, or if that person is implicated, they should contact a Director of the business.



Our health & safety policy statement



The health and safety of our employees is of the utmost importance to us. CEO, Alistair Gough, recognises the responsibility to ensure that all reasonable precautions are taken to provide and maintain working conditions that are safe, healthy and comfortable; complying to all statutory requirements and codes of practice.

As a company we will ensure

- o Our employees recognise their duty to take reasonable care for the health and safety of themselves and others
- o We provide and maintain safe systems and appliances, minimising any health risks associated with materials, handling, storage, transport and equipment
- o We arrange sufficient resources, including instruction, information, training and supervision to conduct health and safety properly
- o We undertake regular risk assessments of employees and environments and adopt any appropriate protective and preventative measures to reduce risks as identified
- o We review current Health and Safety legislation and any statutory guidance and update our policy annually to reflect any changes and ensure we are compliant
- o We arrange insurance against liability for death, injury and/or disease suffered by any of its employees arising out of and during employment, if caused by negligence or breach of duty on the part of the Company.

Employees have access to the full Health and Safety Policy through their line managers. Employees should recognise that failure to comply with their health and safety obligations can lead to dismissal. In the case of serious breaches, such dismissal may be instant without prior warning.



Our quality policy statement



Quality management is key to our business operations. Aligned directly with two of our internal values, quality management is all about providing our customers the best products and service possible.

These values underpin every aspect of our business to ensure that we combine exceptional products with unrivalled customer service. The below points are integral to ensure that we drive continuous improvement:

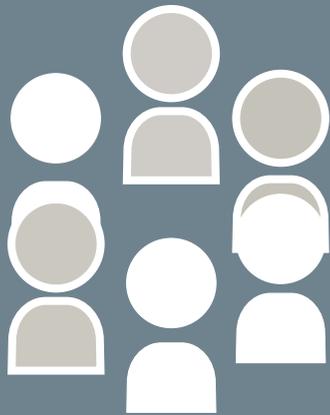
- o We will ensure a close dialogue with our customers to ensure that we meet all their needs and expectations
- o We will structure and monitor the quality of our products in all phases; development - production - transportation - use
- o We will incorporate our values into our supply chain
- o We will provide an 'Aim to Amaze' customer service
- o We will ensure that specific standards are met for certified products and company accreditations to ensure we conform to all requirements

Our aim is to ensure all employees understand their role within quality management and how they can help contribute to outstanding quality and service.

Our group ISO9001:2015 Quality Management certification helps guide our quality performance by setting objectives to monitor against, with the aim to continually improve year-on-year.



Our equal opportunities and diversity policy statement



Ocee International is committed to providing equal opportunities for all employees, including job applicants. The below points are integral to achieve this:

- o Our Equal Opportunities policy will comply with current statutory requirements.
- o Equal opportunities will be applied regardless of disability, skin colour, race, religious beliefs, age, sex, marital status, sexual orientation, gender reassignment, ethnic origin or national origin.
- o The Company will provide equal opportunities when recruiting, selecting, training and promoting individuals.
- o All employees will abide by the policy in the treatment of other employees, clients and visitors alike.
- o Individuals responsible for training, recruiting and the management of fellow employees shall abide by the equal opportunities policy and statement.

Any employee found to be in breach of this equal opportunities' declaration will be subject to disciplinary action in accordance with the Employee Handbook. Such action, dependant on the seriousness of the breach, or repeated breaches of the policy may result in dismissal.



Our anti-harassment and 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 status, level or grade. It therefore includes Senior Managers, Directors, employees, consultants, contractors, trainees, part-time or fixed-term employees, casual and agency staff.

We are responsible for ensuring that our employees are not harassed, bullied or discriminated against based on their sex, sexual orientation, age, marital status, gender reassignment, race, religion, skin colour, nationality, ethnicity or disability.

We acknowledge our responsibility under the Health and Safety at Work Act 1974 and the Charter of Fundamental Rights of the European Union. As such, this policy is communicated to employees upon commencement and is available from Line Managers and HR upon request; which explains the procedure for employees to report cases of bullying or harassment. Complaints will be managed and investigated in a timely and confidential manner, with due respect for the rights of all parties concerned. Conclusion that harassment or bullying has occurred will result in prompt action to stop any forms of current and recurrence of harassment and bullying. Subsequent decisions will be dealt with under our disciplinary procedure, determining the dismissal or transfer of the offender, and/or mediation between the employees.

All employees are protected under our Whistleblower policy, of which all cases will be dealt with the upmost confidentiality.



Our whistle blower policy statement



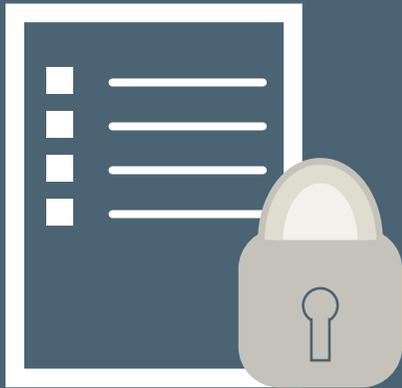
We want to create a workplace of trust and openness, that protects employees.

In accordance to the Employment Rights Act 1996, and new 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.

This is explained in more detail in the full policy; please contact HR for a copy of the full Whistle Blower Policy.



Our GDPR policy statement



We understand our responsibility under the EU Regulation 2016/679 General Data Protection Regulation (GDPR) to protect personal data. We place high importance on the fair handling of all personal data, respecting the legal rights, privacy and trust of all individuals with whom it deals.

GDPR defines 'personal data' as any information identifiable to a person. For example; name, number, location data, online identifier; or to factors specific to the physical, mental, cultural, or social identity of that person.

Our full policy outlines the Company's obligations to collection, processing, transfer, storage, retention and disposal of personal data. The mentioned procedure is to be adhered to by the Company and any stakeholders who work on behalf of the company. Any personal data breaches must be reported immediately to the Company's Data Protection Contact and dealt with accordingly. If the breach is likely to result in risk to the rights and freedoms of data subjects, they must be informed immediately. The Company's Data Protection Contact must also inform the Information Commissioner's Office within 72 hours of becoming aware of the breach. This is explained in more detail in the full policy; please contact HR for a copy of the full Data Protection Policy.



Core Labour Policy

1/2

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 FSC and other applicable standards to which the company is obligated, the scope of which includes:

Child Labour

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. The company will however support work experience where coordinated through schools and colleges as part of a young persons education and is aware of its obligations to comply with Employment of Children Act 1973.

Any under 18 persons who are legally employed by Ocee International 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 on health including hazardous or heavy work, the risk assessment process shall ensure this is the case.

Forced Labour/Modern Slavery

All employment relationships with the company are voluntary and based on mutual consent, without the threat of a penalty. Ocee International will ensure compliance with Modern Slavery Act 2015 and that the following practices do not take place, including, but not limited to:

- o physical and sexual violence
- o bonded labour
- o withholding of wages /including payment of employment fees and or payment of deposit to commence employment (other than lawful deductions)
- o unreasonable restriction of mobility/movement
- o retention of passport and identity documents
- o threats of denunciation to the authorities.

Discrimination

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



Core Labour Policy

2/2

company's Equality & Diversity, Bullying & Harassment and Recruitment and Selection Policies.

Freedom of Association and Collective Bargaining

Employees may raise concerns as individuals or collectively and may consult with management/HR on any employment matters including terms and conditions of employment. As such no formal union or other employee representative currently exists within the company.

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/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' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.

Compliance and monitoring

To ensure compliance with the above core requirements Ocee International will complete and maintain the FSC self-assessment template detailing how we apply these principles. Company policies have been established, implemented and maintained detailing commitment toward these core labour requirements.

The company will also for any outsourced activities apply due diligence by requesting that non FSC certified outsourcers make declarations confirming their compliance with the same core principles.

The completed self-assessment will be submitted to our FSC certification body on request and shall be reviewed at least annually or in the event of any changes or breach of the core principles or Ocee International own related policies. The Group HR Director is ultimately responsible for implementation of these procedures and related compliance obligations, and responsible for maintaining and reviewing the FSC core labour self-assessment.



Let's furnish the world *better*

