

	RHINO ENGINEERING GROUP LIMITED INTEGRATED MANAGEMENT SYSTEM ETHICAL TRADING AND HUMAN RIGHTS POLICY	Doc Ref. RS 010
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This document is a statement of the Company's Ethical Trading & Human Rights Policy. This does not form part of your employment contract and it is not legally binding except where it is a statement of the law.

1. Policy Basis

This policy is applicable to Rhino Engineering Group Limited (REGL) and all subsidiary companies including Rhino Systems Limited (RSL), Rhino Site Systems Limited (RSSL) and Rhino HySafe

REGL has a number of fundamental principles and values which it believes are important to uphold and which are contained in our Corporate Social Responsibility (CSR) Policy.

As part of a fundamental review of the way in which the business demonstrates its adherence to the principles set out in the CSR Policy, we have examined our responsibilities and our preferences when sourcing materials from suppliers and potential suppliers. As a result of this review we have produced this Ethical Trading and Human Rights Policy, which is supported by the Board of Directors and has been guided by both industry and international standards. It is required in order to uphold the reputation of REGL with its customers and suppliers.

The policy covers the main issues that may be encountered in relation to product sourcing and sets out the standards of professionalism and integrity which should be maintained by individuals in all Group operations worldwide. Any doubts or uncertainties about ethical sourcing issues can be resolved in the first instance by contacting the Directors.

This Policy expresses the standards concerning safe and fair working conditions for employees, responsible management of social and environmental issues within the Company and the international supply chain.

As a company we support organisations in upholding human rights principles, wherever we operate. Although there is no definitive consensus on the boundaries of corporate responsibility in respect of human rights, we need to ensure that we are not involved in human rights violations, either directly or indirectly and that we operate in accordance with the Universal Declaration of Human Rights (UDHR) and take account of other internationally accepted human rights standards, e.g. the International Labour Organisation (ILO) Core Conventions.

In addition to this we should promote human rights through our employment policies and practices, through our supply chain and through the responsible use of our products and services.

2. Ethical Trading Principles – Human Impact

In choosing the businesses we wish to develop long term partnerships with, we have established key principles which we would expect these businesses to adhere to. These have been based on the Ethical Trading Initiative Base Code, and we consider them to be fundamental to our Ethical Trading Policy. These are outlined below:

1. Employment is freely chosen.
2. Freedom of association & collective bargaining is respected.
3. Working conditions are safe and hygienic,
4. Child labour shall not be used.
5. Living wages are paid in line with local law.
6. Adhere to National laws and industry benchmarks regarding working hours.
7. Discrimination is not practised.

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8. Regular employment is provided
9. No harsh or inhumane treatment is allowed.
10. Comply with Immigration Law. Only employ workers who have a legal right to work.
11. Committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within REGL. As part of the company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

3. Ethical Trading Principles – Environmental Impact

Suppliers should, as a minimum, comply with all statutory and local legal requirements relating to the environmental impacts of their business in their country. In addition, steps should be taken to optimise the use of energy and natural resources and reduce the generation of waste e.g.:

- **Waste Management:** - Waste is minimised and items recycled wherever practicable. Effective controls of waste in respect of ground, air, and water pollution must be adopted. In the case of hazardous materials, emergency response plans must be put in place.
- **Packaging and Paper:** - Undue and unnecessary use of materials shall be avoided, and recycled materials should be used wherever appropriate.
- **Conservation:** - Processes and activities shall be monitored and modified as necessary to ensure conservation of scarce resources, including water, flora and fauna and productive land in certain situations.
- **Energy Use:** - All production and delivery processes, including the use of heating, ventilation, lighting, IT systems and transportation, must be based on maximising efficient energy use and minimising harmful emissions.
- **Product Selection:** - Proactively work to ensure materials and products selected are environmentally beneficial.

4. Ethical Trading Principles – Economic Impact

REGL will not exert undue pressure on its suppliers in terms of price, discount, payment terms or other financial arrangements so as to jeopardise the long term viability of their operations. The Company aims to use a variety of assessment methods to verify ethical sourcing standards and will work collaboratively with our suppliers on the implementation of the Policy, which may include:

- Vendor assessment questionnaires or joint audits.
- Site visits.
- Individual and group employee interviews.

The Company may use external sources such as SEDEX (Supplier Ethical Data Exchange) to allow for wider research and to cross check details with third party assessments.



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5. Principle – Operating

We encourage a spirit of mutual trust between REGL and our suppliers and will work with them to achieve required ethical standards and as far as possible, at no increase in cost or decrease in quality.

- A Director will be assigned responsibility for compliance with this policy and effective communication of the policy to employees. Suppliers are expected to do the same.
- Suppliers and subcontractors will be treated fairly, honestly and in accordance with agreed terms.
- From time to time, suppliers may divulge confidential information to REGL and its employees. It is our duty to respect these confidences.
- Any complaints from suppliers will be dealt with promptly and fairly.
- It is not Company policy to knowingly infringe on the copyright, trademarks, patents or other properly registered intellectual property of others.
- Employees will ensure that contracts or arrangements agreed with suppliers are consistent with the values and principles outlined and that they do not reflect badly on the reputation of the Group.
- Any site visits conducted, or interviews completed, will be reported and the results communicated to suppliers to allow for transparency and feedback. We recognise this as a continuous improvement process, with the aim of working with suppliers to improve standards rather than find alternative sources of supply.

6. Arms/Weapons

Suppliers shall not engage:

- In the manufacture of arms
- In the sale of arms to governments which systematically violate the human rights of their citizens; or where there is internal armed conflict or major tensions; or where the sale of arms may jeopardise regional peace and security.

7. Business Courtesies and Inducements

Offering, giving, soliciting or receiving any form of bribe or under-the-table payment, including unauthorised gifts, is prohibited. Good judgment and moderation must be exercised to avoid misinterpretation and any adverse effect on the reputation of REGL or its employees.

8. Intellectual Property

Suppliers and contractors must use REGLs trade information, copyrights, and trademarks only in a manner that is permitted under their contract with Rhino Systems.

Suppliers and contractors must not use trade secrets or proprietary or confidential information for their own purposes or disclose such information to unauthorised third parties. Suppliers and contractors must notify REGL of any unauthorised use of the Company name, trademarks and logo by any third party.



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9. Confidentiality

Suppliers and contractors must protect REGL information, not disclose it to any third party.

10. Respect for Local Tradition and Hidden Workers

Within the framework of this policy we will respect the local cultures of the countries within which the Company operates, and be flexible in our approach.

11. Monitoring and Compliance

Generally, preferred supplier status will not be conferred unless REGL Ethical Sourcing Policy can be complied with and the Company considers their performance is acceptable, or genuine attempts are being made to address violations of this policy.

REGL reserves the right to audit compliance with this policy or appoint a third party to conduct an audit. All violations will be reported to the supplier's Directors for their attention and appropriate corrective action. Regardless of corrective action required, REGL may terminate its relationship with any supplier who does not comply with the Ethical Sourcing Policy, without liability to the supplier for damages resulting from termination.

The provisions of this policy constitutes minimum and not maximum standards, and suppliers and contractors, must apply this policy as well as other applicable laws, and where the provisions of law and this policy address the same subject, they must apply the provision which affords the greater protection.

Those suppliers operating off-shore must as a minimum, abide by all laws in that jurisdiction, together with the labour standards set out in this Policy.

REGL expects access to information on supplier practices and will place particular emphasis on the use of 'hidden workers,' such as home workers, children, and contracted labour, when considering suppliers from countries outside of normal operations.



Stuart Lawrence

Group Managing Director