


Document Details						
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POLICY

Delta Mobrey Ltd will ensure that all management of the Supply Chain, including management of the procurement process from initiation of the requirement to delivery of those supplies, services and works, which Delta Mobrey Ltd requires to operate the business, will be delivered to achieve sustainable commercial solutions to meet or exceed our business, owner and stakeholder requirements.

1 Commitments

Delta Mobrey Ltd:

- Maximises value by effective management of the supply chain;
- Maximises efficient delivery of goods and services;
- Balances commercial risks and opportunities;
- Complies as a minimum with all relevant legislation, regulations, codes of practice and other requirements applicable to management of the supply chain
- Ensures value for money through appropriate use of competition in the supply chain;
- Complies with the Bribery Act 2010 and the Modern Slavery Act 2015, and requires the highest professional ethics, standards and conduct both of itself and of the supply chain;
- Deliver a programme of Supplier Relationship Management, work collaboratively with those key/strategic suppliers that are vital to our success, and maximize the potential value of those relationships;
- Drives, through supply chain management, a robust continuous improvement and learning culture that learns from internal and external experience, critically assesses us performance against high standards, and supports growth and development;
- Operates a transparent make-buy process to achieve the most cost-effective solutions;
- Ensures that all goods and services purchased conform to specified requirements at the point of use;
- Conducts procurement to pursue social, economic and environmental objectives.

2 Anti-Slavery and Human Trafficking Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, 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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our organisation. We are also committed to ensuring there is transparency in our organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

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.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

3 Responsibility for the policy

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those in our organisation comply with it.

The Head of Procurement and their team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and training on it and the issue of modern slavery.

4 Compliance with the policy

Staff must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or s of any supplier at the earliest possible stage.

If staff are unsure about whether a particular act constitutes any of the various forms of modern slavery, they should raise it with their manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may

be taking place in any part of our own organisation or with any of our suppliers. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

5 Communication and awareness of this policy

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.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6 Conflict of Minerals Policy statement

Delta Mobrey is committed to conducting our business activities in accordance with the highest legal and ethical standards. This commitment is reflected in our Procurement Policy, we are also committed to sourcing materials from suppliers that share our values, and we expect our suppliers to comply with this Policy.

We are concerned that trade in certain minerals mined in regions of the Democratic Republic of Congo and adjoining countries (“Covered Countries”) and metals refined from those minerals – tantalum, tin, tungsten and gold (“3TG”) -- may be contributing to human rights abuse.

In keeping with the ongoing international rules related to “conflict minerals,” we confirm that, to the best of our knowledge, all products produced and supplied by Delta Mobrey Limited do not contain any intentionally added gold, tin, tantalum, tungsten or cobalt or their derivatives, that has been sourced from the Democratic Republic of Congo (DRC) and / or adjoining countries.

Delta Mobrey is committed to working with our suppliers to determine whether our purchased materials contain 3TG from a Covered Country, and if so, to confirm that the use of such minerals does not directly or indirectly finance or benefit armed groups, and to fully complying with the SEC reporting requirement.

7 Delta Mobrey Supplier Expectations

Supply raw materials that do not contribute to human rights abuse.

Suppliers are expected to supply materials to Delta-Mobrey that do not contribute to human rights abuse in the Covered Countries, which means:

Any 3TG necessary to the functionality or production of materials must not directly or indirectly fund armed conflict in the Covered Countries or 2) any 3TG must be from recycled or scrap sources.

Adopt conflict minerals policy. Suppliers to Delta Mobrey must adopt a policy regarding 3TG that is consistent with Delta Mobrey’s policy, implement management systems to support compliance with their policy, and require their suppliers to take the same steps.

Develop and provide supply chain due diligence and provide responses to Delta Mobrey, in a timely manner with regular updated information, where necessary.

8 Anti-corruption and bribery matters

Delta Mobrey's ethical principles act as a reminder that offenses such as bribery and corruption are not tolerated within the business. The Company believes that no one should obtain or retain business through coercion. Even the suggestion of such action could seriously damage the reputation of Delta Mobrey. Delta Mobrey does not condone, under any circumstance, the offering or receiving of bribes or any other form of improper payment. Delta Mobrey will not accept or offer money to any employee of a government organisation or a government official. Similarly, it does not tolerate any such activity by its employees or by those with whom it does business.

9 Counterfeit, Fraudulent, Suspect items

Delta Mobrey Ltd aims to prevent, detect and dispose of fraudulent, counterfeit and suspect supplies.

Counterfeit – Items that are intentionally manufactured or altered to imitate a legitimate product without the legal right to do so.

Fraudulent – Items that are intentionally misrepresented with intent to deceive. Fraudulent items include, but are not limited to, items provided with incorrect identification or falsified / inaccurate certification.

Suspect Supply – Items that are suspected of being counterfeit or fraudulent.