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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 our 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 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.

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 Procurement - Supply Chain Manager 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 training on it and the issue of modern slavery.

4 Compliance with the policy

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

The prevention, detection and reporting of modern slavery 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 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.

6 Conflict Minerals Policy

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 (sub-tiers)

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 Anti-Trust Laws

Delta Mobrey Ltd will not make formal or informal agreements with competitors, trade associations or industry bodies which result in price fixing, bid rigging, market allocation and arrangements to limit supply. Will not share commercially sensitive information with competitors, trade associations or industry bodies. This might include information about prices, ongoing bids, terms and conditions of sales, market share, costs or profit margins. We will check carefully before we make agreements with trade associations, industry bodies, customers, joint venture partners or suppliers so we are clear about any existing restrictions on who they can sell to or buy from, and on what terms. In markets where we might be said to have 'market power' (including some of our aftermarkets), take care over arrangements which might be seen unfairly to exclude competitors or exploit customers.

10 Rights of Access

Delta Mobrey is committed to allow their representative, their customer and third-party personnel the right of access to applicable areas of the facilities to inspect or test the Goods or work which are the subject matter of the Order at any reasonable time and to all applicable records to perform surveillance activities and the review of hold/witness points.

11 Political activity and Trade Association

Delta Mobrey Ltd if engaging in any Political activity, including Political advocacy commits to communicating with political stakeholders. This includes the development of policies relevant to our business and our industry. In doing this, we will comply strictly and fully with all relevant legal standards and requirements. All employees, and anyone acting on behalf of Delta Mobrey, engaged in Political activity must act with honesty, integrity and transparency at all times. Delta Mobrey Ltd does not make Political donations and does not engage in activity that favours one Political party over another. Any organisation we work with must meet these standards.

12 Counterfeit, Fraudulent, Suspect items (CFSI)

Delta Mobrey Ltd recognises the risks and concerns associated with the supply of Counterfeit, Fraudulent and Suspect Items, which may consequently be built into our products, and aims to prevent, detect and dispose of fraudulent, counterfeit and suspect supplies.

We understand the requirement of our customers to ensure that their suppliers have processes in place to prevent this from occurring.

Counterfeit, Fraudulent and Suspect Items are those whose age, composition, configuration, certification, or any other characteristics are different to those of authentic goods, however, are still represented as original – identification:

- Shorter lead times than other suppliers
- Sudden availability of obsolete or hard to source goods
- Cheaper than expected prices
- Slight differences in packaging and labels

To protect ourselves and ultimately our customers, Delta Mobrey Ltd have implemented a proactive and comprehensive prevention policy for all purchases entering or leaving our company. Some of our controls include:

- Purchase from OEM's
- Franchised Distributors
- Manufacturer or Agent
- Our Approved Suppliers

- Accompanied by appropriate certification
- Clear technical and defined specifications where applicable
- Our Procurement team are trained and aware of CFSI.

Our suppliers are required to adopt this policy and is mandatory to our order.

It is also a question within our Supplier Assessment Questionnaire on their policy, used at supplier visits and audits (sub-tiers) and New Supplier Assessments.

Certain hard to find or obsolete parts cannot always be obtained from primary sources. In these cases, it may be necessary to source through brokers or independent distributors, only our approved suppliers will be used.

To monitor our suppliers' deliveries, rigorous inspection procedures apply.

If any CFSI are identified, all parties will be informed immediately, and use of the part will be ceased until we are confident that authentic parts have been supplied.

13 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.

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