



**BRAND
PROTECT
DELIVER**

Corporate Social Responsibility

Introduction

SMI Group is a family business that seeks to be a good corporate citizen and an employer of choice. We believe strongly in conducting business honestly, fairly, and with respect to people and to the planet.

This document brings together our business principles and policies and provides practical guidance for our managers and employees. SMI is committed to positively influencing our partners and we expect them to agree to and adopt our standards as their own.

SMI's Commitment

Our Board of Directors is committed to good corporate governance based on the principles of honesty, integrity, transparency, and respect for human rights.

Our managers are responsible for ensuring the policy is communicated, understood and observed by all employees. It is everybody's job to create a positive working environment and culture that promotes SMI's business values.

Employees who reasonably suspect that there has been a breach of this policy should report it to their line manager, senior management, or other reporting mechanisms established by SMI. Our management will take disciplinary action against any employee who threatens to or engages in retaliation, retribution or harassment of any whistle-blower.

The Board of Directors will not criticise management for any loss of business resulting from adherence to the principles set out in this policy.



1. Employees

- a. We are committed to creating and maintaining a safe and healthy working environment to our employees. We have ISO 18001 accreditation. We have a separate, more extensive SMI Health & Safety Policy which can be accessed upon request.
- b. We strive to create a workplace in which there is mutual trust and respect for individuals, where people feel they are treated fairly, and where employees can collaborate positively with one another
- c. We will work towards achieving a diverse workforce.
- d. We will promote a culture of dignity and respect for each person's ethnicity, religion, nationality, political beliefs, gender, sexual orientation, marital status, age, and disability.
- e. We only hire and promote employees who are best suited for the job. We will evaluate individuals on objective criteria and select the most qualified and talented employees for the tasks at hand.
- f. We seek to maintain good communications with employees through our information and consultation procedures.
- g. We are committed to assisting employees to realise their full potential through training and professional development. We have a separate, more extensive SMI Employee Handbook which can be accessed upon request.



2. Customers

- a. We are committed to providing good value for money, high quality goods, and consistency in products and services to our customers.
- b. We work to build strong relationships with our customers based on mutual trust, respect, honesty, and loyalty.
- c. We deliver on our promises and we will not promise what cannot be delivered.
- d. We remain accessible to our customers and apart from products, we will also provide them with truthful information and customer support and services that they require. If any problems occur, we will address them in a fair and timely manner without undue cost or burden to our customers.
- e. We will act in accordance with fair business, marketing, and advertising practices. We will not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair.
- f. We respect customer privacy and provide protection for personal data in accordance with the relevant local law.



3. Business Partners, including Suppliers

- a. We work to build strong relationships with our partners based on mutual trust, respect, honesty, and loyalty.
- b. We will agree to clear and fair payment terms with partners and we will honour our obligations.
- c. We have a zero-tolerance policy on the payment of bribes, hospitality or gifts to our teams, to individual employees, or to their family members.
- d. We require all our partners to agree to SMI's Supplier Code of Conduct, which outlines the standard working conditions that we require of all partners and companies in our supply chain – from UK offices, to warehouses and transport providers, down to factories and manufacturing facilities. It is based on the conventions of the relevant sections of the International Labour Organisation (ILO) and the ETI Base Code, states that:
 - 1. Living wages are paid
 - 2. Working hours are not excessive
 - 3. Working conditions are safe and hygienic
 - 4. Child labour is not used
 - 5. Employment is freely chosen
 - 6. No discrimination is practiced
 - 7. There is no harsh or inhumane treatment
 - 8. Freedom of association and the right to collective bargaining are respected
 - 9. Regular employment is provided

We have a separate, more extensive **SMI Supplier Code of Conduct** which can be accessed upon request.

- e. We require full transparency throughout the supply chain and strictly forbid any undisclosed subcontracting. All supplier partners must disclose their supply chain partners and if any of this information is to change, SMI must be notified immediately for authorisation.
- f. We are committed to positively influencing our supply chain partners and we require our suppliers to share our business standards, including the SMI Supplier Code of Conduct, with their suppliers and supply chain partners.
- g. We will monitor working conditions of our suppliers via factory audits and visits and we require full transparency and cooperation from our suppliers during this process. SMI will pay for all auditing costs. If problems are found, we will offer our suppliers support to make the necessary corrections in an agreed time frame. If, however, we do not see a genuine commitment to improve, we will need to evaluate the business relationship.



4. The Environment

- a. We are committed to making continuous improvement in the management of our environmental impact, particularly our energy usage, water usage, and waste and recycling. We monitor and track these statistics.
- b. We will look into ways to reduce our CO2 emissions, for example, in our office, warehouse, and through transport providers.
- c. We separate our waste and recycling where possible.
- d. We use recyclable packaging and commit to making improvements in the sustainability of our packaging.



5. Our Business Practices

- a. We do not tolerate dishonest, unethical or corrupt behaviour.
- b. We will comply with the laws and regulations applicable wherever we do business.
- c. We will not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. No employee may offer, give, seek or receive any gift or payment which is, or could be construed as such. If any employee is in any doubt as to whether he or she may accept an offer, the management is available to provide guidance. We will adhere to the UK Bribery Act 2010.
- d. We will always produce accurate accounting and other records that honestly describe and reflect the nature of the underlying transactions. We will not establish or maintain undisclosed or unrecorded accounts or assets.
- e. We will not facilitate, support, tolerate or condone any form of money laundering.
- f. We expect employees and directors to avoid personal activities and financial interests which could conflict with their responsibilities to SMI. We require that all actual and potential conflicts (including those arising from the activities or interests of family members) be disclosed to and discussed with the company.
- g. We prohibit directors and employees from seeking gain for themselves or others through misuse of their positions or company property. We insist that information received by anyone during his or her employment must not be used for personal gain or for any purpose other than that for which it was given.
- h. We request that where information is confidential, that confidentiality must be respected.
- i. We will not exchange non-public or other sensitive information with anyone external to the business and we will not seek to obtain this type of information about competitors.



6. Charity and Community

- a. We are active supporters of the Grace Trust – a broad scope aid charity that operates on both a local and international level. They provide humanitarian aid and assistance in response to natural disasters, work to alleviate global poverty, and support medical research.
- b. We are also supporters of Shooting Star Chase Hospice in Surrey which provides care for babies, children and young people with life limiting conditions.
- c. We are proud to support our employees, customers, and our community with ad hoc donations and other support when we can.



SMI Team visiting the
Shooting Star Chase Hospice