

ETHICAL TRADING POLICY

Organisation: Graphinixx

Ethical Trading Policy

Document Title: Ethical Trading Policy

Organisation: Graphinixx

Effective Date: 11 May 2026

Review Date: 11 May 2027

1. INTRODUCTION

1.1 Purpose and Scope

Graphinixx is committed to maintaining the highest standards of ethical trading practices across all aspects of its business operations. This Ethical Trading Policy (hereinafter referred to as "the Policy") establishes the principles, standards, and procedures that guide our organisation's commitment to ethical conduct in all commercial relationships and transactions.

This Policy applies to all employees, contractors, consultants, temporary staff, and representatives of Graphinixx. It further extends to all suppliers, vendors, partners, and any

third parties engaged to provide goods or services to the organisation. The scope of this Policy encompasses all operations conducted within the United Kingdom and any activities undertaken on behalf of Graphinixx internationally.

1.2 Policy Statement

Graphinixx recognises that ethical trading practices are fundamental to sustainable business operations and the creation of positive societal impact. We are committed to conducting our business with integrity, transparency, and accountability. We believe that ethical trading is not merely a legal obligation but a moral imperative that forms the foundation of our corporate identity and values.

Our commitment extends beyond mere compliance with applicable legislation and regulations. We strive to exceed minimum legal requirements by adopting best practice standards that promote fair dealing, respect for human rights, environmental sustainability, and responsible business conduct.

1.3 Policy Objectives

The primary objectives of this Policy are to:

- Establish clear ethical standards applicable to all parties operating within or on behalf of Graphinixx
- Ensure compliance with all applicable UK and international laws and regulations pertaining to ethical trading
- Protect the interests of employees, suppliers, customers, and stakeholders
- Promote transparency and accountability in all business dealings
- Safeguard Graphinixx's reputation and brand integrity
- Create a framework for identifying, assessing, and mitigating ethical risks
- Demonstrate corporate social responsibility and commitment to sustainable business practices
- Foster a culture of ethical decision-making throughout the organisation

2. ETHICAL PRINCIPLES

2.1 Core Values

Graphinixx operates according to the following core ethical values:

Integrity: All staff and associated parties shall conduct business with honesty, openness, and consistency. We do not engage in deception, fraud, or misrepresentation in any form.

Fairness: We treat all business partners, employees, customers, and stakeholders equitably and without discrimination. Fair dealing is central to all our commercial negotiations and transactions.

Respect: We respect the rights, dignity, and wellbeing of all individuals and organisations with whom we interact, including respect for cultural differences and diverse perspectives.

Accountability: We take responsibility for our decisions and actions, maintaining transparent reporting and accepting consequences for breaches of ethical standards.

Sustainability: We conduct business in a manner mindful of environmental, social, and economic impacts, considering both current operations and long-term consequences.

2.2 Anti-Corruption and Bribery

Graphinixx has a zero-tolerance approach to corruption and bribery in all forms. All staff and representatives must comply fully with the Bribery Act 2010 and all relevant anti-corruption legislation.

No employee or representative of Graphinixx shall:

- Offer, promise, give, or authorise the provision of any financial advantage or benefit to any person to induce them to perform their duties improperly or to retain business
- Solicit, request, or accept bribes, inducements, or financial benefits in exchange for performing duties or influencing business decisions
- Engage in corrupt practices with public officials, private sector representatives, or any other persons
- Participate in any arrangement designed to circumvent anti-corruption laws through intermediaries or third parties

All gifts and hospitality must be recorded and justified as business-appropriate. Gifts of significant monetary value or those that could reasonably be perceived as inappropriate are prohibited.

2.3 Conflicts of Interest

All employees and representatives of Graphinixx must disclose and manage potential conflicts of interest transparently. A conflict of interest arises when personal interests may, or could reasonably appear to, compromise professional judgment or objectivity.

Potential conflicts of interest include, but are not limited to:

- Financial interests in competitors, suppliers, or customers
- Personal relationships with individuals employed by suppliers or customers
- Directorships or shareholdings in related organisations
- Receipt of gifts or benefits from external parties
- Secondary employment or business interests

All actual or potential conflicts of interest must be disclosed immediately to line management or the Compliance Officer. Where conflicts exist, appropriate management measures shall be implemented, which may include recusal from decision-making, enhanced oversight, or termination of the conflicting interest.

2.4 Fair Competition and Antitrust

Graphinixx commits to competing fairly and lawfully in all markets. We comply fully with UK and international competition law and do not engage in anti-competitive practices.

Our business practices exclude:

- Cartels or price-fixing arrangements with competitors
- Bid-rigging or collusion in tender processes
- Abuse of dominant market positions
- Unlawful restrictions on customers' or suppliers' commercial freedom
- Misuse of confidential information obtained from competitors

All pricing, contract terms, and business decisions are determined independently, based on legitimate commercial considerations and market conditions.

2.5 Confidentiality and Data Protection

Graphinixx maintains strict confidentiality of sensitive business information and personal data. All staff shall comply with the Data Protection Act 2018 and UK GDPR requirements.

Employees must:

- Protect confidential information belonging to Graphinixx, suppliers, customers, and partners
- Process personal data only for legitimate, specified purposes
- Implement appropriate security measures to prevent unauthorised access or disclosure
- Respect the privacy rights of all individuals
- Obtain explicit consent before processing personal data where required
- Report any data breaches immediately to the Data Protection Officer

3. SUPPLIER STANDARDS

3.1 Supplier Selection and Engagement

Graphinixx selects suppliers based on criteria including competitive pricing, quality standards, reliability, and compliance with this Ethical Trading Policy. All new suppliers must be assessed for ethical and compliance standards before engagement.

Supplier selection shall not be influenced by corrupt payments, improper inducements, or considerations other than legitimate commercial factors. Supplier agreements shall contain explicit clauses requiring compliance with this Policy and applicable laws.

3.2 Labour Standards and Human Rights

All suppliers must ensure that their operations comply with applicable employment law and international labour standards. Suppliers must not engage in:

- Forced labour, slavery, or human trafficking
- Child labour or employment of minors in violation of applicable law
- Discrimination in employment on grounds of protected characteristics
- Excessive working hours or unsafe working conditions
- Denial of freedom of association or rights to collective bargaining
- Harassment, bullying, or abusive treatment of workers

Graphinixx reserves the right to audit supplier premises and conduct investigations to verify compliance with labour standards. Suppliers must maintain records of employment practices and submit to inspection upon reasonable notice.

3.3 Environmental Responsibility

Suppliers are expected to conduct operations in a manner that minimises environmental

impact. Suppliers must:

- Comply with all applicable environmental legislation
- Reduce waste and promote recycling and resource efficiency
- Manage hazardous substances responsibly
- Reduce carbon emissions and energy consumption
- Implement environmentally sustainable practices where feasible
- Provide transparency regarding environmental performance

Graphinixx actively encourages suppliers to obtain relevant environmental certifications and to demonstrate continuous improvement in environmental management.

3.4 Financial Viability and Transparency

Suppliers must operate with financial integrity and transparency. We require suppliers to:

- Maintain accurate financial records and accounts
- Pay taxes and comply with financial reporting obligations
- Provide financial information for assessment purposes upon request
- Disclose relevant financial relationships and ownership structures
- Maintain appropriate insurance and professional indemnity cover
- Report any financial difficulties that may impact service delivery

3.5 Sanctions and Compliance Screening

All suppliers are subject to screening against sanctions lists, including those maintained by HMRC, the Office of Financial Sanctions Implementation, and relevant international authorities. Suppliers must not:

- Be subject to financial sanctions or restrictions
- Conduct business with sanctioned individuals or entities
- Facilitate transactions in breach of sanctions legislation
- Operate in jurisdictions subject to comprehensive sanctions regimes

Graphinixx reserves the right to terminate supplier relationships where sanctions compliance concerns arise.

3.6 Supplier Audit and Monitoring

Graphinixx conducts regular audits and monitoring of suppliers to ensure ongoing compliance with this Policy. Audit activities may include:

- Document review and verification of compliance claims
- Inspection of supplier premises and operations
- Interviews with supplier personnel
- Review of employment records and working conditions
- Environmental compliance assessment
- Financial review and credit checks

Suppliers must cooperate fully with audit activities and provide requested documentation within reasonable timeframes. Failure to cooperate or evidence of material non-compliance may result in contract termination and suspension from future engagement.

3.7 Whistleblowing and Grievance

Graphinixx encourages suppliers and their employees to report ethical concerns, violations, or breaches of this Policy. All reports shall be treated confidentially and without retaliation against reporters.

A dedicated whistleblowing channel is available for confidential reporting of concerns relating to supplier practices or Graphinixx operations. Reports may be submitted anonymously where preferred, and all reports shall be investigated promptly and impartially.

4. REVIEW

4.1 Policy Review Schedule

This Ethical Trading Policy shall be reviewed annually on 11 May each year, or sooner if significant legislative changes, business developments, or identified compliance issues necessitate earlier review.

The Policy review shall be conducted by the Compliance Officer in consultation with senior management, and shall assess the continuing appropriateness and effectiveness of the Policy provisions.

4.2 Continuous Improvement

Graphinixx is committed to continuous improvement of its ethical trading practices. All staff and suppliers are encouraged to provide feedback and suggestions regarding the effectiveness and practical application of this Policy.

4.3 Policy Approval

This Policy has been approved by the Board of Directors and shall be disseminated to all staff and suppliers. Compliance with this Policy is mandatory and constitutes a condition of employment and/or engagement with Graphinixx.

Document Authority: Graphinixx Management

Next Review Date: 11 May 2027

© 2026 Graphinixx. All Rights Reserved.