

# SUSTAINABILITY POLICY

For imageData Group, sustainability means advancing solutions that address local & global challenges, whilst performing to the highest standards to meet the needs of our customers, staff and suppliers. Through collaboration we can make a positive contribution towards a sustainable world.

Our commitment to society & the environment is embedded in our company vision:

- **We have** a relentless focus on reducing the impact of our products & operations in the environment.
- **We undertake** to invest in technologies that move us towards becoming a zero net carbon business & we collaborate with our industry partners to achieve this goal.
- **We invest** only in technology & processes that improve energy efficiency & reduce resource use.
- **We maintain** programs designed to protect the health & safety of our colleague.

Our sustainability policy focuses on three key areas: **delivering sustainable & circular products, reducing our CO<sup>2</sup> emissions** and **using only responsibility sourced materials**.

## RESOURCE USE & THE CIRCULAR ECONOMY

***We will conserve natural resources by:***

- Designing waste out of our products and processes in conjunction with suppliers and customers.
- Eliminating pollution by adopting low carbon technologies where these are available.
- Recycling materials at every stage, in-line with our zero to landfill policy.
- Developing products that improve the quality and sustainability of the environment and seek to eliminate all non-conforming products.

## REDUCTION OF CO<sup>2</sup> EMISSIONS

***We endeavour to reduce our carbon footprint by:***


- Investing only in innovative and sustainable equipment to continually improve the efficiency of our manufacturing processes. *cont...*

- Adopting low energy technologies.
- Implementing combined heat and power technology in our buildings.
- Taking steps to reduce vehicle movements for raw materials and finished goods.

## RESPONSIBLE SOURCING OF MATERIALS

*We will improve the sustainability of our industry by:*

- Maintaining an ethical sourcing policy in-line with the standards laid out by SEDEX (registered no. ZC40559300).
- Adherence to the management systems of ISO 14001.
- Promoting the use of recyclable materials to our customers.
- Working with suppliers to develop substrates manufactured from post-consumer waste.
- Supporting the Forest Stewardship Council® scheme (License FSC®- C002977).

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**Helen Birkin** CEO

1st January 2026

# IMAGEDATA GROUP STATEMENT ON MODERN SLAVERY & HUMAN TRAFFICKING

## INTRODUCTION

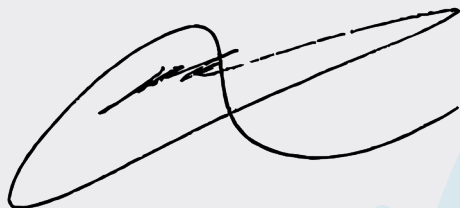
imageData Group operates three print manufacturing facilities based within the United Kingdom. Each of these facilities has employees on site during all operational times. Each facility is governed by our core policies and procedures and adheres to all regulations relevant to providing goods and services within the UK.

imageData Group does not constitute a Relevant Commercial Organisation in relation to Section 54 of the Modern Slavery Act 2015 for reporting purposes with an annual turnover below the stated £36m threshold however as a company that strongly believes in ethical trading and corporate, social responsibility we have developed a statement to ensure our customers and supply chain are aware of our commitment to the Act.

It is our practice to ensure that all employees of imageData Group are treated fairly and that they have been employed in line with UK employment law.

We operate a code of conduct and ethical trading which sets out our policy concerning our group adherence to all relevant legislation and we undertake every reasonable step to ensure that where agency staff are used in any process, that these have been engaged and employed in a correct method and that the agency conforms with our policies relating to employment practices including this statement of Anti-Slavery, Child Labour and Human Trafficking.

This policy statement should be read in conjunction with our Supply Chain Management Statement.

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**Helen Birkin** CEO

January 2026

# CHILD LABOUR PROCEDURE

[ZERO TOLERANCE APPROACH](#) | [EFFECTIVE REMEDIATION PLANS](#) | [LEADERSHIP ROLE AT INDUSTRY LEVEL](#)

## SUMMARY

imageData Group have a zero tolerance policy approach to child labour in any part of its supply chain. It is essential that children are not put at risk or deprived of an education or childhood, or in any way mentally, physically, socially, or morally harmed, through working in supply chains. Children are vulnerable because they are still developing both physically and emotionally. iDG will make every effort to ensure that child labour does not feature in any supply chain. If, in an extreme case a situation of child labour did occur, we would execute an effective remediation plan. Furthermore, that root causes are understood, and corrective and preventative actions are put into practice.

## POLICY

Suppliers must not employ workers who are younger than:

- A. The legal minimum age for employment applicable to the supplier/country, or**
- B. The age of completion of compulsory education.**

A supplier must not employ a person under the age of 15 in any circumstances and must implement robust age verification checks to ensure this policy is upheld.

Suppliers must not recruit child labour nor exploit children in any way. If children are found working directly or indirectly for the supplier, the supplier must implement a remediation plan, develop or participate in and contribute to policies and programs that elevates the best interests of the child first, and enables the child to access appropriate education until no longer a child.

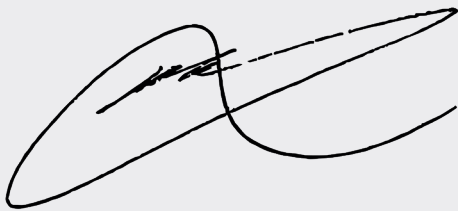
Young workers under the 18 years of age must not be employed to work at night, or in hazardous conditions which compromise their health, their safety or their moral integrity, and/or which harm their physical, mental, spiritual, moral or social development.

All work of persons under the age of 18 must be subject to an appropriate risk assessment and regular monitoring of health, working conditions, and hours of work.

If under age workers are identified in suppliers currently supplying iDG products, whether employed directly by the supplier, or by a third party labour provider, the approach will be to first ensure the child has all the protection their local labour law affords them. We would then seek to work with the supplier and appropriate organisations to develop a program to provide for the child's transition back into appropriate education.

The welfare of the child must be the priority and the aim of iDG is to take into account the needs of the child and their family. Under age workers must not be dismissed or suffer any hardship as a result of any audit/investigation. The child should be removed from work immediately, and support given to locate safe accommodation and food.

Continuity of orders/supply is a key component of successful implementation and completion of remediation plans, however in certain circumstances further orders maybe suspended until the supplier engages in a suitable remediation plan which matches the needs and circumstances of the child. If a supplier cannot demonstrate ownership of a remediation program and commitment to no further recruitment of child labour, no further orders will be placed. Only when iDG are satisfied with a supplier demonstrating ownership will orders/supply be resumed.

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**Helen Birkin** CEO

January 2026

# HUMANS RIGHT POLICY

Human rights are fundamental principles which allow an individual to lead a dignified and independent life, free from abuse and violations. These basic rights include freedom of speech, privacy, health, life, liberty and security, as well as access to clean water and sanitation and an adequate standard of living. As a manufacturer, employer and buyer, our business was founded on the belief that we are only as strong as the communities in which we trade. We strive to be a fair partner through our purchasing practices. To pay a fair price to suppliers, supporting local communities and ensuring good working conditions for everyone working in our business and supply chains.

iDG is committed to respecting internationally recognised human rights in line with the principles and guidance contained in the United Nations (UN) Guiding Principles on Business and Human Rights. Our Human Rights Policy is informed by the International Bill of Human Rights, International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, the Children's Rights and Business Principles. We believe respecting human rights is of growing importance to our employees, workers, shareholders, investors, customers, consumers, the communities where we operate and civil society groups. There is both a business and a moral case for ensuring that human rights are upheld across our operations and supply chain. As part of this commitment iDG does not tolerate threats, intimidation, physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest.

We will not tolerate, nor will we condone, abuse of human rights within any part of our business or supply chains, and we will take seriously any allegations that human rights are not properly respected. We place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance mechanisms. We are committed to building awareness and knowledge of our employees and suppliers on human rights encouraging them to speak up, without retribution, about any concerns they may have.

## RISK

We operate in a diverse range of geography, cultures and regulatory environments. Against this backdrop, it is important to understand where our operations and sourcing impact adversely on individuals and to prioritise our effort in these areas. Through risk assessment and due diligence, we consider and define key issues where we believe we can impact people affected by our business.

***Our risk identification and prioritisation include the following:***

- Desk based research
- Data from our audits and monitoring programs
- Work surveys
- Supply chain due diligence
- Supplier engagement
- Discussions with stakeholders

In 2025 we completed a review of our group salient human rights issues, with input from internal and external stakeholders. ***These were listed as follows:***

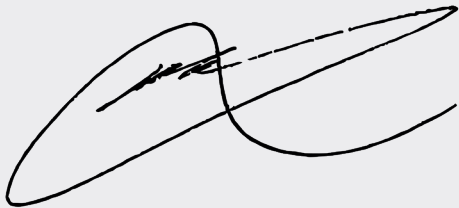
- Discrimination and gender
- Forced Labour
- Freedom of association
- Health & Safety
- Wages and income
- Labour exploitation and working hours
- Sedex Membership
- Modern Slavery Policy
- IDG Labour Policy procedure

## **COMPLIANCE**

The Company shall recognise individuals and communities as holders of human rights and shall:

1. Deploy established governance framework to ensure compliance with human rights commitments.
2. Integrate an approach that respects and protects human rights in business strategy and risk frameworks.
3. Foster an understanding of human rights across all stakeholders of the business.
4. Promote the protection of human rights through established fair, transparent & consultative remediation mechanisms and address any negative impacts arising from or related to business activities. *cont...*

5. Disclose progress on human rights performance in line with national and/or global reporting frameworks.
6. Adhere to the principle of non-discrimination in process of hiring, remuneration, training, promotion, and separation.
7. Deploy established governance framework to ensure the right to privacy for all employees.
8. Inclusion of environmental stewardship in the human rights policies.

A handwritten signature in black ink, appearing to read 'Helen Birkin', written over a light blue background.

**Helen Birkin** CEO

January 2026

# ANTI-BRIBERY POLICY

## OVERVIEW

imageData Group recognises the importance of preventing bribery and corruption within its workforce and is keen to raise awareness and enforce 3 main principles for all our employees:

- 1. To act with integrity in all our dealings;**
- 2. Not to tolerate any corrupt practices;**
- 3. To be accountable and act responsible**

## PRINCIPLES

imageData Group is committed to the practice of responsible corporate behaviour and complying with all the laws, regulations and any other requirements which govern the conduct of its operations.

The Bribery Act was passed in 2010 and came into force in July 2011. It specifically covers corruption abroad as well as in the UK.

The Company is fully committed to instilling a strong anti-corruption culture and is fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 (“the Act”) and ensures that no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.

The Company has a culture of ethical behaviour and expects all employees to act with integrity in all their dealings related to the business.

Bribery is both a criminal offence and bad for business. Under the Bribery Act 2010, bribery is widely defined. Not only can individuals be guilty of an offence but a company can also be prosecuted if it fails to prevent bribery - whether in the UK or overseas. Employees are encouraged to be vigilant at all times and report any suspicions that they may have. Corrupt activity could seriously damage the business, so it is in the interest of all personnel to be on their guard.

## DEFINITION

Bribery is defined as the giving or promising of a financial or other advantage to another party where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage is in itself improper conduct. *cont...*

Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce that party to perform a particular function improperly, where the acceptance of that advantage is in itself improper conduct, or where that party acts improperly in anticipation of such advantage.

Bribery of a foreign official is defined as the giving or promising of a financial or other advantage which is intended to influence the official in order to obtain business or an advantage in the conduct of business unless the foreign official is required or permitted by law to be influenced by such advantage.

## CONSEQUENCES OF BRIBERY

Anyone or any organisation found guilty of bribery under the Act may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result from any breach of the Act.

For employees of the Company, failure to comply with this Policy and/or with the Act may result in disciplinary action (which may include dismissal) and/or criminal penalties under the Act which may result in a fine and/or imprisonment for up to 10 years.

For the Company, any breach of this Policy by any colleague or business associate may result in:

- The Company being deemed to be in breach of the Act;
- The Company being subject to fines; *and*
- The Company suffering negative publicity and further associated damage as a result of such breach.

## HOSPITALITY & RECEIVING OF GIFTS

Hospitality & Gifts must be modest, appropriate, transparent and recorded/approved in advance. Employees must always avoid accepting or offering any hospitality or gift when this is in the hope that the Company will receive a business advantage or to reward an advantage that has already been received. All hospitality and gifts must be transparent: i.e. disclosed to the company and, in appropriate circumstances, approved in advance.

Entertaining or being entertained by clients and contacts is not in itself prohibited. But it must be appropriate, modest and given or accepted in the context of our business. Also, all offers of and invitations to hospitality must be reported to the appropriate Senior Manager before any commitment is made.

Generally, gifts should not be offered or accepted unless the value and type of gift is clearly not a potential factor in any business decision. So, for example, a gift of a company calendar or felt tip pen with the company logo is acceptable. If any valuable gifts are offered to any colleague, they should be reported to a Senior Manager who will decide on how they are to be dealt with.

A valuable gift is anything worth more than £30. *cont...*

It is prohibited to solicit any cash or financial benefit or assistance from any third party with whom the Company may have a business connection. It is also prohibited to make any cash gifts or payments to third parties with whom you deal in relation to the Company's business.

It is not acceptable to have any dealing with a third party with whom the Company has a business connection whereby you or a friend or relative might gain an advantage in return for some business advantage for that third party. For example, an employee must not favour a potential building contractor because the contractor offers to do some work for the colleague at a low price or in order to secure a job for his cousin with that contractor. Any offer of personal benefit must be reported. In addition, if the company representative suspects that a personal benefit may result from the course of legitimate business, this must be reported to the compliance department, for the avoidance of doubt, before that business takes place.

The Company does not make donations to any political party and never makes a gift with a view to influencing policy of the party or the decisions of its members or officials.

## RISK ASSESSMENTS

Whenever the Company considers a new venture with another organisation or individual, a risk assessment should be undertaken as a first step, accompanied by due diligence on the prospective business partner. The Exec Board will then consider the results before sanctioning any formal relationship.

Risk assessment falls into four main categories:

- **Sector Risk** - Is the type of business that we carry on exposed to the risk of bribery and if so what are the main risk areas? How can these be minimised or eliminated?
- **Transaction Risk** - Is a potential business opportunity or contract one where there is a risk of bribery or corrupt activity on the part of the client, any member of our team or any competitor, and is the risk most likely to be found at pre-qualification, tender, pre-contract negotiation or contract performance?
- **Country Risk** - When considering doing business overseas, whether as exporter, importer, or setting up an office or manufacturing base, what are the risks to which we may be exposed due to the different culture in the new country and the need for dealing with unfamiliar systems and organisations - from immigration officials to local sponsors? Here we should always seek assistance from outside specialists - e.g. banks, accountants, lawyers and Foreign Office officials who are based in or familiar with the territory.
- **Partner Risk** - When considering a joint venture, term contract with a supplier or customer, or the appointment of an external consultant, agent or distributor, are we exposed to any new risks due, for example, to the fact that we may not be in control of certain financial or contractual aspects of the new relationship? If yes, then how can we restructure the process, so risk is minimised or eliminated?

Once risks have been identified and assessed, the Exec Board will decide on how best to proceed and protect our interests. The risk assessment will be used to determine appropriate controls, which are sensitive to the likelihood and severity of each risk.

## DUE DILIGENCE

Before entering into negotiations with third parties and before any letter of intent, commitment or contract is made with a third party, appropriate due diligence on that third party and the foreseeable related transactions should be undertaken.

The importance of extensive and robust due diligence cannot be overstated as this can save unnecessary cost and possibly embarrassing complications further down the line.

When planning to sign up a long-term deal with a third party - supplier, joint venture partner, manufacturer, agent, distributor etc. these checks are especially important. Visits to the other party's premises and investigation of their business are important as a preliminary to any contractual commitment.

As for the contract, the terms will always require CEO and MD approval and no binding commitment can be made before this is given.

The terms of all contracts should contain the usual protection for the Company and must include a provision that obliges the other party to comply with this Code of Conduct and not to do or permit anything that might put the Company in breach of the Bribery Act.

## CONTACT INFORMATION

The Company's primary point of contact for advice and guidance and to whom any suspicion of bribery or any other concern relating to unlawful activity should be reported are:

Email: [hr@imageData.co.uk](mailto:hr@imageData.co.uk) and put Subject heading as "Compliance"

Telephone number for Head Office: **01482 379952**

## RESPONSIBILITIES

This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company or any of its subsidiaries. All employees are expected to read this Policy carefully and be sure to comply with it at all times.

It is the responsibility of all of the above mentioned parties to ensure that bribery is prevented, detected and reported and all such reports should be made in accordance with the Company's Whistle blowing Policy or as otherwise stated in this Policy, as appropriate.

All our Senior Managers have a duty to ensure that the Policy is understood and observed by their own teams and to monitor compliance. This will include dissemination of this Policy to all employees.

It is also the responsibility of Senior Management to bring this Policy to the attention of our business partners, contractors, agents and consultants. Those outside parties who provide services to the Company or act on our behalf can be given a copy of this Policy and be asked to confirm that they will observe its terms in their dealings on behalf of the Company. *cont.*

Each employee is expected to conduct business honestly and to be on guard against any conduct by other members of the Company or by third parties that is or appears to be corrupt in any respect. Tell your Line Manager if you have any concerns. It is extremely important that you do not notify or alert the suspected party in such circumstances. Confidentiality will be observed in any such discussion. Any breach of the Policy will be treated seriously and could constitute gross misconduct resulting in dismissal.

Our Finance team will maintain appropriate procedures to ensure all relevant transactions including entertainment and hospitality costs are recorded and any abnormal expenses identified and scrutinised (see Annex 1).

### POLICY APPROVAL

- This policy has been considered in line with the new UK GDPR principles and all paperwork kept in strict accordance of timelines, the right to rectify errors, the right for information to be forgotten (after the designated timelines) and the right to privacy throughout the process.
- This policy has been produced by HR and authorised by CEO
- This policy will be reviewed on an annual basis to ensure that it continues to meet the needs of imageData Group and ensure compliance with current legislation.
- This policy applies to all employees of ImageData Group.

VERSION CONTROL	
Policy Number: HR/AB1/2026	Version: 1
Authorised by: <i>On behalf of CEO</i>	Authorised by: <i>On behalf of HR</i>
This policy is issued and managed by HR	

# GIFTS, HOSPITALITY, & ENTERTAINMENT REGISTER

This form should be completed by employees before offering or receiving gifts, hospitality or entertainment to third parties (*over £30 in value*).

Employee Name	
Job Title	
Location/Department	

Description of Gift/Hospitality/ Entertainment	Name of contact and organization	Date	£ Value

Reviewed by: (Senior Manager)	Reviewed by: (Compliance Officer)/MD/CEO
Date:	Date:
Comments:	Comments: