



# Ethical Sourcing Policy

LOKR Sports Ltd

Last updated: 28 April 2026

## Document Control

**Policy Owners:** CEO

**Approval Date:** 01/08/2024 \ **Effective Date:** 01/08/2024 \ **Review Date:** October 2026

**Note:** This policy must be reviewed annually or when significant changes occur to ensure its continued relevance and effectiveness.

- **01/08/2024** (v1.0, Claire Robinson) Create formalised Ethical Sourcing Policy based on existing Environmental Statements
- **10/08/2025** (v1.1, Claire Robinson) Annual Review
- **08/10/2025** (v1.2, Claire Robinson) Updates for LOKR.

## 1. Introduction

This policy outlines LOKR Sports Ltd (LOKR)'s commitment to environmental stewardship and recognises the importance of integrating sound environmental practices into our operations. This Ethical Sourcing Policy outlines our commitment to sustainable development, compliance with environmental laws and regulations, and the continuous improvement of our environmental performance.

## 2. Scope

This policy applies to all employees, contractors, suppliers, and other third parties working with or on behalf of our organisation. It applies to all employees, contractors, and stakeholders involved in the Company's operations. It covers all activities, products, and services provided by the Company and aims to integrate environmental considerations into decision-making processes. Suppliers are required to read this policy and confirm that they will abide by its aims and objectives as part of our onboarding and due diligence process.

## 3. Policy Statement

### LOKR's Commitment to Delivering on the Principles in this Policy

The Company is dedicated to upholding the principles outlined in this Ethical Sourcing Policy. It is imperative that all directors, employees, consultants, and business partners conduct themselves in accordance with the highest legal, moral, and ethical standards. Any breaches must be promptly reported to the Company's senior managers or directors for remediation and, if necessary, disciplinary action. These standards of conduct also extend to our business operations.

Specifically, we are committed to:

- Prioritising the health, safety, and well-being of our team members, customers, and suppliers.
- Ensuring fairness and transparency in all our interactions with team members, customers, and suppliers.
- Upholding principles of diversity, inclusion, and equal opportunity.
- Safeguarding confidentiality and privacy.

## Understanding the Ethical Sourcing Policy

### 3.2 Purpose

The purpose of this Ethical Sourcing Policy is to establish the minimum expectations that the Company has of its suppliers.

These expectations are guided by international human rights and labour standards frameworks, including:

- The United Nations Guiding Principles on Business and Human Rights.
- The Ethical Trading Initiative (ETI) base code.
- The International Labour Organisation (ILO) fundamental conventions

concerning rights at work.

### 3.3 Application

The Company recognises its community responsibilities beyond employment and wealth creation activities.

We are committed to making positive economic, social, and environmental contributions in the communities where we operate.

Good corporate behaviour is integral to all aspects of our operations.

While we acknowledge that some suppliers may need time to achieve compliance with this policy, we are dedicated to working collaboratively with them to ensure adherence. Non-compliance may result in termination of business relationships, and we reserve the right to request information and conduct social audits to assess compliance.

### 3.4 Scope

This Ethical Sourcing Policy applies to all suppliers of goods and services to entities within the Company. A 'supplier' refers to any individual, company, or legal entity that sells products or services to the Company.

Suppliers are expected to have adequate policies and practices in place to ensure compliance with the spirit and intention of this policy. All sourcing on behalf of the Company must be from suppliers who also adhere to this Ethical Sourcing Policy.

## 4. Business Integrity and Ethics

**4.1 Legal Compliance** Suppliers must comply with the laws and regulations of the jurisdictions in which they operate. In cases where this Ethical Sourcing Policy conflicts with local laws or regulations, the stricter requirement shall apply.

**4.2 Bribery and Corruption** Suppliers are prohibited from engaging in bribery, corruption, or any other unethical practices to influence business decisions or gain an unfair advantage.

**4.3 Intellectual Property** Suppliers must respect the intellectual property rights of the Company and third parties. The transfer of technology and know-how must be conducted in compliance with relevant laws and regulations.

**4.4 Grievance Mechanisms** Workers should have access to grievance mechanisms for addressing complaints in a fair and equitable manner. Procedures for reporting non-compliance with this policy should be communicated to workers, with provisions for anonymous disclosure and protection against retaliation.

**4.5 Responsible Sourcing** Suppliers must exercise due diligence in sourcing raw materials to minimise the risk of human rights and environmental violations.

**4.6 Data Protection and Privacy** All personal and sensitive information must be handled in accordance with relevant data protection laws. The Company, as well as all directors, employees, consultants and business partners must behave in accordance with the highest legal, moral, and ethical standards. Any breaches must be reported to the Company's senior managers or directors to enable the remediation of any harm caused and if warranted, disciplinary action.

These behavioural standards also extend to the way we conduct business.

## **5. Labour Standards and Human Rights**

### **5.1 Voluntary Employment**

The use of forced or involuntary labour, including debt bondage, human trafficking, and prison labour, is strictly prohibited. Suppliers must refrain from employing deceptive practices, threats, fraud, or abduction in the recruitment, transportation, or retention of workers. Workers' freedom of movement shall not be restricted by withholding property, such as identity documents, passports, or licences. Employees have the right to terminate employment with reasonable notice.

## **6. Child Labour Prohibition**

Children under the age of 15 shall not be employed. Suppliers are required to verify the age of workers before their employment. Workers under 18, referred to as 'Young persons', shall receive appropriate training and supervision to protect their physical and mental well-being. The right to education for workers under 18 must be respected. Any instances of child labour must be addressed promptly, with the child's best interests prioritised.

## **7. Legal Labour Requirements**

Suppliers must verify the legal entitlement of their employees to work in the country of employment.

## **8. Freedom of Association**

Suppliers shall acknowledge and uphold employees' rights to freedom of association and collective bargaining in accordance with local laws and regulations. Workers have the right to elect a representative without fear of discrimination.

## **9. Working Hours**

Employee working hours must comply with local laws. Overtime should be voluntary and not exceed 60 hours per week. Workers must receive at least two days off for every seven days worked on average. Suppliers should consider workers' health and well-being when assigning overtime.

## **10. Fair Wages**

Suppliers must provide wages and benefits that meet or exceed minimum standards set by local jurisdictions. Employees must receive written information, in a language they understand, regarding their employment contract and wages for each pay period. Deductions from wages as a disciplinary measure are prohibited.

## **11. Employment Practices**

Suppliers shall not circumvent their obligations and benefits to employees through subcontracting, apprenticeship schemes, or fixed-term contracts.

## **12. Non-Discrimination**

Suppliers must not discriminate against employees based on race, gender, age, religion, disability, sexual orientation, marital status, or union membership status at any stage of employment.

## **13. Harassment and Abuse**

Employees must be treated with dignity and respect, free from physical, sexual, psychological, or verbal harassment or abuse. Suppliers must ensure a work environment free from harsh or inhumane treatment.

## 14. Migrant Workers

Migrant workers are entitled to the same rights as local workers as stipulated by local laws and regulations.

## 15. Healthy and Safe Working Conditions

Suppliers must comply with the relevant laws and regulations of the manufacturing country and establish systems to identify and address potential risks to the health and safety of employees and visitors. This includes:

- Identifying and mitigating occupational hazards by implementing measures to minimise risks in the workplace and providing necessary safeguards.
- Supplying personal protective equipment and ensuring employees are trained in its proper use.
- Maintaining a clean and hygienic work environment, including access to toilet facilities and safe food storage.
- Developing and maintaining a documented disaster recovery plan, including procedures for notifying workers and emergency services, identifying emergency exits, and providing access to first aid equipment.
- Providing annual health and safety training to workers, covering emergency procedures, disaster recovery plans, and evacuation drills, with records of training maintained.
- Assigning responsibility for managing workplace health and safety to a senior officer.

## 16. Environmental Protection

### 16.1 Minimising Environmental Impact

Suppliers must take reasonable measures to minimise the negative impact of their operations on the environment and encourage their suppliers to do the same throughout their supply chains. In addition to complying with relevant laws and regulations, suppliers must maintain current permits and licences as required and ensure proper disposal of solid, liquid, and hazardous waste.

### 16.2 Environmental Planning and Management

Suppliers must develop and maintain appropriate environmental management systems or plans for all operated production facilities. These plans should identify the key environmental impacts of each facility and document measures to manage these impacts, including waste reduction, recycling, air and water pollution control, and safe handling of hazardous chemicals.

### 16.3 Reporting and Further Information

For enquiries or clarification on any aspects of the company's Ethical Sourcing Policy, or to report suspected or actual breaches, please contact us at [dpot@headtoLOKR.com](mailto:dpot@headtoLOKR.com)

## 17. Responsibility

- **Board of Directors:** The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- **Chief Executive Officer (CEO):** The CEO has primary and

day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

- **Management:** Management at all levels are responsible for ensuring those reporting to them is made aware of and understand this policy and are given adequate training on it.

## **18. Enforcement:**

- All employees, contractors, and suppliers are expected to comply with this policy. Non-compliance may result in disciplinary action or termination of contracts, depending on the nature and severity of the breach. Persistent or deliberate breaches may be escalated to the Board for further action. LOKR reserves the right to audit compliance and require corrective measures where deficiencies are identified.

## **19. Review**

All policies are reviewed on an annual basis automatically. Additional specific criteria for review include:

- Changes to local or national policy or service provision or legislation.
- Incidents prompting policy review (e.g., where policy was not followed, or proved inadequate).