



UK Modern Slavery Act

Response 2019

Digital Projection Ltd Modern Slavery Act **Response 2019**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Digital Projection Ltd. has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business and supply chain.

Company Overview

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Digital Projection Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically, and with integrity and transparency in all our business dealings, and putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Digital Projection Limited designs, develops, manufactures, markets and sells, premium displays to customers who value the very best images for a wide range of applications. Our strategy is to satisfy our wide ranging customers' needs through the combined application of our UK based design and manufacturing resources, and also our design and manufacturing partners. We strive to ensure that our products reflect our brand values and we take care of our customers in a manner of which we are proud.

The philosophy of open communication applies to all aspects of our operation and also to our relationships with our supplier partners, many of whom are critical to our success and with whom we have been working with for many years.

We employ a skilled workforce dealing with 60 countries worldwide, working closely with these partners to ensure ethical and effective development and supply.

Our main partner, Delta, is our Associate Company and as such shares our values in this respect. Delta takes the issue of Modern Slavery very seriously as well, both within its own workforce and further down its supply chain. A copy of Delta Group Human Rights and Employment Policy can be found in Appendix A at the end of this document.

Code of Conduct

Our Code of Conduct, covering staff, workers and intermediaries lays out our expectations and guiding principles for appropriate workplace behaviour. It also covers relationships between employees, service users and clients. It is our belief that our reputation and work environment are based on the actions and behaviours of our employees. We require compliance with all applicable legislation and expect the use of good judgement.

Digital Projection is committed to the principle and practice of diversity in employment. Its employment policies are therefore designed to be fair, equitable and consistent with the skills

and abilities of its employees. Our procedures and practices will embed diversity in recruitment, training and promotion and equal terms and conditions of employment in all jobs of equal value. All Management are made aware of our policies.

We aim to act with fairness, honesty, integrity and openness, and respect the opinions of others, and treat others with fairness and integrity, without regard to gender, sex, race, colour, creed, ancestry, beliefs, religion, place of origin, marital status, disability, age or sexual orientation.

The organisation will not condone or tolerate the victimisation or harassment of any current or prospective employee, worker or any member of the public on any of the above grounds. As a result, any evidence of discrimination carried out by an employee of Digital Projection or any of its subsidiaries will be viewed extremely seriously.

Personal harassment means any conduct whether verbal or physical that is discriminating in nature, based upon another person's personal characteristics.

Digital Projection Ltd has a zero tolerance policy with respect to harassment which, in any form, is prohibited.

Whistleblowing Policy and Procedure

Digital Projection Ltd is committed to conducting its business with honesty and integrity. Digital Projection Ltd expects the highest standards from all workers and employees, and will treat seriously any concern that is made about illegal or improper conduct.

Digital Projection Ltd is committed to the highest possible standards of openness, probity and accountability, as detailed in our Whistleblowing Policy. The procedure enables all workers and employees to notify senior colleagues of any reasonable suspicion of illegal or improper conduct which may include neglect of duty and maladministration. It provides an avenue to raise those concerns and receive feedback on any actions taken

Recruitment Policy.

Effective recruitment and selection of employees is important to Digital Projection Ltd. Our Procedure covers both staff employed directly, through an agency or self-employed.

- Only approved recruitment agencies are used.
- Candidates are checked for right to work in the UK.
- For employed staff references are required from at least two people, normally the most recent employers.
- For certain positions a Disclosure and Barring Service check is carried out.

Procurement and Supply Chain.

We work with over 380 direct suppliers around the world. Our relationship with most suppliers is long term. We purchase a wide range of products that are either integrated into the products we manufacture in the UK or are bought in as finished products branded as Digital Projection.

Purchases can be ‘off the shelf’ catalogue items such as electronic components or fasteners. Indirect purchases can include travel, consumables or contract labour.

Our ISO9001 system and in particular our ‘Material Procurement and Receiving Procedure’ sets out our policy and processes of how we establish a new supplier; how they are approved for the ‘Approved Supplier List’; and how we audit and monitor the supplier.

Supplier Chain Selection Process

Prior to approval, each supplier is evaluated and due diligence is carried out, both financial and non-financial:

- Management Systems – ISO9001 etc.
- Environment / Health and Safety – usually a site visit
- Responsible trading practices – ethics, legislation
- Second opinion and authorisation by our major trading partner to ensure they agree and have no issues with a chosen supplier.

We use Dun & Bradstreet to carry out financial check on any proposed suppliers

On Going Supplier Management

Directly contracted suppliers are regularly audited as part of the Material Procurement and Receiving Process. Audits are done on site where possible, and depending upon the level of risk. Alternatively it can be done via supplier completed Audit forms, or data as supplied on the website, such as catalogue suppliers.

What would Digital Projection Ltd do if Modern Slavery were found in its Supply Chain?

If modern slavery or human trafficking were found within any of its supply chain Digital Projection Ltd would act immediately with the supplier and relevant authorities to understand the circumstances of what has been found. If found to be proven and the supplier was unable or unwilling to take corrective action, then Digital Projection would terminate supply contracts, seek alternative supply and would raise the matter with the relevant authorities .

Monitoring.

Each year we will review how our processes and audit mechanism can be improved and put in place any actions to further our commitment to the principles of avoidance of Modern Slavery

This statement was approved by the board of directors of Digital Projection Ltd on 9th December 2019

Dermot Quinn.
Chief Operating Officer
Digital Projection Ltd.



Delta Group Human Rights and Employment Policy

I. Overview

Human rights are fundamental rights, freedoms, and standards of treatment to which all people are entitled. Respect for human rights is rooted in our values and applies wherever we do business. Delta's Human Rights and Employment Policy (the "policy") is intended to succinctly express Delta's communication to respect human rights on a worldwide basis. It embodies common principles reflected in the United Nations (UN) Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises, Social Accountability 8000 Standards, Responsible Business Alliance Guidance, and the laws of the countries in which we operate.

II. Scope

The scope of the policy applies to all employees, subsidiaries, business partners, suppliers, and contractors of Delta Electronics, Inc.

III. Our Principles

1. Diversity and anti-discrimination

The makeup of our staff is large and diversified. We respect the diversity of our Board of Directors, workforce, and the versatility of our value chain. We do not tolerate discrimination and strictly forbid any discrimination against any employee based on ethnicity, nationality, region or social class, origin, lineage, religion, disability, gender, sexual orientation, pregnancy, family responsibilities, marital status, group membership, political affiliation, age, or other status protected by the local laws or laws of other countries.

2. Working hours, wages and benefits

All employment must be in full compliance with all applicable laws and apply international standards where laws are less stringent, including working hours, overtime hours, minimum wage, overtime pay, and legally mandated benefits. Employees shall be allowed at least one day off for each seven working days.

3. Freely Chosen Employment

Employees have the right to terminate the employment contract in accordance with local laws or the reasonable notice period as agreed upon in the contract.

4. Prevention of forced labor and human trafficking

We require ourselves, third party employment agencies, suppliers and our business partners to ensure that all work is freely chosen. As an employer and global

corporate citizen, we do not accept any type of forced labor, slavery, or human trafficking. These include the transportation, transfer, harboring, recruitment, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to anyone for the purpose of control.

5. Child Labor and Young Workers

We prohibit the employment of child labor. We support the elimination of improper and illegal business transactions related to child labor and operate in accordance with relevant legal requirements and ethics. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

6. Humane treatment

We are committed to treating our employees humanely and do not allow any form of violence or harassment in the workplace. This includes sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse of workers, or threat of any such treatment.

7. Freedom of association

We recognize that all employees in many of our operation locations have lawful rights to associate with others, form, and join, or refrain from joining organizations of their choice, and bargain collectively. We support freedom of expression and are committed to creating an environment where employees can share their concerns or suggestions freely without interference, discrimination, retaliation, or harassment.

8. Workplace health and safety

We are dedicated to providing all workers with a clean, healthy and safe working environment. We maintain an occupational health and safety management system to achieve greater protection, where appropriate. It is our policy to comply with applicable regulatory requirements, reduce health and safety risks, and strive to achieve zero injury and incidents.

9. Ethics

We request that all Delta members should uphold the highest standards of business ethics, including, but not limited to, maintaining business integrity, using no improper advantage, anti-corruption, avoiding conflicts of interest, protecting intellectual property rights, anti-trust, and assuring conflict minerals in products are from responsible sources.

10. Value chain responsibility

We expect all suppliers to uphold these same values and comply with our supplier code of conduct, and conflict mineral requirements (Supplier CSR Policy, Supplier Code of Conduct, Declaration of Compliance with RBA Code of Conduct, Metal Origins and Declaration of Conflict Metal Free). All suppliers shall follow up on the above request and implement practices under an effective mechanism. Suppliers shall pursue actions to identify, monitor, and mitigate any adverse impact along the value chain.

IV. Policy Compliance

The Delta Human Right Policy is governed by a procedure that demands full compliance. Compliance with this policy will be reported to the Board of Directors annually. Daily practices and regular monitoring are implemented by each site through various tools, such as self-assessment sheets, audits, periodic evaluation, and system tools. Grievance and remedy processes will take place on a continuous basis. Concerns from employees, partners, suppliers, and contractors can be communicated through various channels anonymously. Appropriate documents and records should be maintained to ensure compliance. To ensure the effectiveness of the policy, principles are reviewed annually and updated as needed. Training will be provided accordingly to employees and relevant stakeholders.

V. Grievance and Remedy Processes

We have put in place a formal grievance channel to enable anyone, including employees, Delta's suppliers, and other external stakeholders, to report human rights concerns. We will promptly investigate allegations and pursue action to mitigate any adverse human rights impact based on policies and regulations in each region. Delta does not tolerate retaliation against anyone who in good faith reports possible violations of laws, the Delta Code of Conduct, or other company policies or procedures.

| Scope of Application | | Mailbox |
|--|-----------------|-------------------------------|
| Employee Other External Stakeholders | Taiwan | HR.GRIEVANCE@deltaww.com |
| | Southern China | 5399.CNS@deltaww.com |
| | Eastern China | 5399.CNE@deltaww.com |
| | Shanghai Region | 5399.SH@deltaww.com |
| | Americas | HR.GRIEVANCE.DAL@deltaww.com |
| | EMEA | HR.GRIEVANCE.EMEA@deltaww.com |
| | SEA | HR.GRIEVANCE.SEA@deltaww.com |
| | NEA | HR.GRIEVANCE.NEA@deltaww.com |
| | India | HR.GRIEVANCE.DIN@deltaww.com |
| Supplier | Global | 885@deltaww.com |

VI. Compliance Effective Date

This policy is effective September 1st, 2019

VII. Edition History

The first edition in July 1st, 2019

The first amendment September 1st, 2019