



Corporate Policy Handbook

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Fileder Filter Systems Ltd

Corporate Policies

Fileder Filter Systems Ltd is an ambitious and forward-thinking SME with over 40 years of expertise in the filtration industry. As independent specialists in the supply of liquid filtration and treatment solutions, we are proud to serve a diverse range of industries. Our filtration systems are widely used across sectors such as food and beverage, pharmaceuticals, engineering, automotive, beauty, aquatics and healthcare. They are trusted by some of the world's most prestigious brands and organisations, including Coca-Cola, McLaren, Neal's Yard, Britvic, Lush and the NHS. At Fileder, we take pride in being a company that's *'easy to deal with'*, offering tailored solutions and exceptional customer service. Our reputation for excellence has been earned through our commitment to quality and global business partnerships. Our dedication to ensuring the highest standards for our clients is reflected in our £6 million stockholding, technical support systems, comprehensive training programmes and state-of-the-art laboratory facilities.

Located in Maidstone, Kent, our modern and open-plan offices are equipped with an exceptional range of amenities, including free on-site parking, a chill-out room, a fully equipped kitchen, a gym and wellbeing suite, and changing rooms with showers. We're also committed to sustainability, with solar panels installed in 2022 and a fleet consisting of 95% electric vehicles with free to use on-site rapid EV charging facilities. Fileder has achieved ISO 14001 Environmental Certification, underscoring our commitment to reducing our environmental impact. Our typical office hours are 9:00am to 5:30pm, although some departments operate on flexible schedules. We offer a range of employee perks and place a strong emphasis on professional growth and development, as well as a welcoming and positive working environment. It is important to us that our employees feel valued and have access to continuous learning, excellent benefits, and career progression opportunities.

Fileder consists of three entities: A UK Holding Company and two subsidiaries (UK and Poland) across 3 facilities.

Business Ethics Overview

Filerder Filter Systems Ltd expects that all of its employees and directors carry out their business and perform their duties to the highest ethical standards and in compliance with all relevant legislation. This standard of behaviour and performance is maintained throughout the Company's handling of employees, customers, suppliers and stakeholders. Filerder consistently strives to create a safe and welcoming work environment and uphold excellence in all of its dealings.

General Principles

- Filerder and its employees will, at all times, demonstrate the highest levels of **integrity, truthfulness and honesty** to uphold corporate reputation and inspire **confidence and trust**. Filerder will conduct its business in a competent, **fair, impartial and efficient** manner and recognises the importance of ethical business conduct and fostering positive business relationships.

Health and Safety

- Filerder is committed to providing a safe and healthy working environment for all its employees both on and off its sites. There is a programme of regular **health and safety audits and safety training**. Filerder applies its standards to all visitors to its sites.

Environment

- **Filerder respects the environment** and recognises the need to protect it and minimise the impact its operations have on it. It is engaged in a continuous programme of improvement on environmental issues and opens itself to independent **third-party verification, inspection and certification** of its progress.

Employees

- All employees are treated with **dignity and respect**. Equal employment and promotional opportunities are given to all, irrespective of their race, religion, gender, sexual orientation, parental duties, marital status, disability, age or national origin. Employees are offered a safe and healthy workplace and Filerder will **not tolerate any form of harassment or discrimination**.

Customers

- Filerder will take all reasonable care to **avoid misleading statements**, concealment and overstatement in all of its advertising and public statements. It will seek to build long-term partnerships with its customers by being **honest and straightforward** in its dealings at all times. It will respect the **confidentiality** of any information that it might obtain in relation to its customers.

Suppliers

- Suppliers will be chosen based on factors such as price, quality, delivery, service and integrity. Filerder's choice of suppliers will be made objectively. Honesty and openness will be paramount in Filerder's dealings with its suppliers. In line with the **Modern Slavery Act 2015**, Filerder is committed to ensuring that there is **no slavery or human trafficking** in the supply chain or any part of the business, therefore, all major suppliers are visited personally by a member of the senior management team to ensure that their business ethics are to the standard required by Filerder.

Competitors

- Filerder will build its reputation based on its performance alone. It will compete **lawfully and and fairly**, without seeking to damage the reputation of its competitors either directly or by implication.

Government Regulators and Legislators

- Filerder will comply with all **international, national and local legislation** affecting its operations. It will strive to follow the best practice in corporate governance and meet its tax obligations. It will not make any financial contributions or offer support to any political party.

Giving and Receiving Gifts and Entertainment

- Employees will neither seek nor accept, for themselves or others, gifts, favours or entertainment without a **legitimate purpose** from any person or business organisation that does or seeks to do business with, or is a competitor of, Filerder. Gifts, favours and entertainment may be given to others at the expense of Filerder as long as these are consistent with customary business practice and are not excessive in value.

Bribes and Corrupt Practice

- Filerder does not allow the direct or indirect offer, payment, solicitation or acceptance of bribes in any form. Filerder has a **Bribery and Corruption Policy** in place, which examines in detail the procedures all employees must follow to avoid involvement in any situation, which might lead to the offer of bribes. The policy makes it clear that any employee found to be involved in any kind of corrupt practice is likely to be immediately dismissed and may well have committed a criminal act, which could lead to prosecution. All employees in relevant roles are required to partake in **anti-bribery and corruption training**.

Money Laundering

- Filerder is committed that its people and products are not used to facilitate the flow or conceal the origin of criminally derived funds or the financing of terrorism, which is collectively money laundering. To ensure Filerder does not partake in any activities that could facilitate this, the Company will only make and accept payments from business partners which are drawn from a bank account under the same name. All employees in the relevant roles are required to partake in **anti-money laundering training**.

Bribery and Corruption Policy

Filerder Filter Systems Ltd is committed to working in accordance with the Bribery Act 2010. The Company supports a culture of openness and transparency in all business transactions and, accordingly, all employees are required to comply with this policy and all relevant employees are required to complete anti-bribery and corruption training at the start of employment. Any employee breaching this policy will be in breach of Filerder's disciplinary rules and could result in dismissal, as well as legal prosecution.

Filerder works in accordance with **Chapters I & II of the Competition Act 1998** and **Articles 81 and 82 of the EC Treaty**, which prohibits anti-competitive behaviour. These laws prohibit anti-competitive agreements between businesses and the abuse of a dominant position in the market, including but not exclusive to bid-rigging, market sharing, sharing information, agreeing with competitors to reduce production or to increase prices and long-term exclusive contracts with customers and suppliers.

- Employees are **not permitted to use their employment for personal gain** and must seek to uphold and enhance the standing of the Company by maintaining an unimpeachable standard of **honesty, impartiality and integrity** in all their business relationships.
- Should employees be offered, regardless of acceptance or not, bribes, gifts, hospitality, or expenses, they are to inform their line manager immediately.
- Employees responsible for, or involved with, procurement on behalf of the Company should take particular care to ensure that **there can be no criticism that unequal treatment has been given** to external organisations involved in a tender process, which may influence the outcome of business transactions.
- Hospitality, gifts or expenses must not be offered or perceived to be offered to employees of other companies with the promise or giving of an advantage. Hospitality and gifts from Filerder employees given to customers, suppliers, or others, **must not influence the outcome of business transactions.**
- Filerder will continue to provide legitimate business hospitality and carry out proportionate and reasonable promotional activities. These, however, are controlled by the **Marketing Department** and overseen by the Managing Director to ensure **compliance with current legislation.**
- The payment of donations to political parties or charities to obtain a business advantage is prohibited. All charity **payments are to be disclosed** to senior management.
- Should an employee be unsure about accepting an offer of a gift or hospitality, they should refer to their Line Manager in the first instance.

Business Continuity Policy

The Business Continuity Policy refers to established procedures relating to risk assessment, planning, emergency preparation, and change management. These form the foundations of Filerder's ISO integrated management system, providing a structure for mitigating risks and implementing controls for disaster recovery.

Filerder demonstrates its commitment to business continuity in the following ways:

- Ensuring a **strong leadership and team confidence** by cross-training staff and providing documented procedures and clear employee responsibilities. Policies, procedures and job descriptions are stored on Cloud-based systems.
- Training employees on fraud, payment card protection, data protection and IT best practices. The Company upholds its **IT Governance and Information Security Policy** and is **Cyber Essentials certified**.
- Maintaining close relationships with freight forwarders, bulk purchasing and conducting regular stock and freight logistics reviews.
- Working with multiple international and quality suppliers who have their own business continuity plans.
- Conducting daily backups of the complete system with copies retained on and off-site.
- Using battery power support of servers to protect from power surges.
- Using a website purchasing portal.
- Insurance covering business interruption with an indemnity period of 12 months.
- First aid: team, training, kit and meetings.
- Fire: marshalls, alarm, extinguishers, emergency lighting, sectional roof venting to limit fire damage, fire drills and procedure. Scheduled maintenance inspections of equipment and the building.
- Building security alarm, CCTV and biometric entry.
- Video conferencing and established home working practices.
- Storing substances in fire-proof cabinets with spillage and handling procedures.
- Conducting a legal register review and audit.
- Continuously monitoring health and safety.
- Implementing robust waste management procedures.
- Conducting a risk assessment, crisis management procedure and recovery plan for natural and man-made disasters/events.

Copyright Policy

Filerder Filter Systems Ltd recognises the Copyright, Design and Patents Act 1988, and supports the moral and legal obligation to respect intellectual property rights. The aim of this policy is to outline the general principles and supporting procedures, upheld by all Filerder employees.

- The Company provides training on **copyright protocols** to minimise infringements.
- **Proprietary content** is created through the Marketing Department and holds licenses for images from Adobe Stock and Presenter Media. Original content for blogs and social media is produced by a third party, with ownership retained by Filerder.
- External content should be **shared via links** rather than copying or screen grabbing. Downloading or saving Google Images is prohibited unless **labelled for reuse**. If licensed images are used, credit the source.
- Company logos or trademarks must follow branding guidelines. Permission to use supplier logos and datasheets is granted by existing suppliers. New suppliers must provide **copyright permissions** through an assessment form.
- Scanning or photographing external content, including images and journal extracts, is prohibited. Use of external images requires approval, especially if there are associated costs. Any permissions should be documented in the **permissions log**.
- ICT manages font and software licenses. Employees must review **licensing terms** before purchase, with support from Business Services.
- All work created during employment at Filerder is owned by Filerder and protected by **copyright law**.
- Filerder may include a copyright notice in image file properties to clearly identify its ownership. This may not apply to the Spectrum product range.
- Employees must **report any copyright infringement**, whether related to Filerder's or external content.
- Content from government sites (e.g., gov.uk, hse.gov.uk) can be copied under the **Open Government License**, but must include a link to the source.
- Brochures, ads, and the website should include a copyright notice to remind users of legal expectations.
- The Filerder website is updated with copyright protection controls, such as disabling right-click, onscreen keyboard copy, shortcut keys, and access to source code.
- The Filerder website terms of use outline copyright protection for website and brochure content. For commercial use, written permission must be requested via **marketing@filerder.co.uk**. Any provided materials should include the statement:
"Filerder permits this intellectual property (insert material reference) for commercial use. Filerder retains full intellectual property rights, and permission may be revoked at any time. Clients are responsible for ensuring the content remains up-to-date."
- Filerder uses AI to generate content but always adjusts and enhances it to ensure relevance and remove copyright concerns. Any changes in AI legislation will be communicated through this policy.

Data Protection and Retention

The **Data Protection and Retention Policy** reflects **Fileder Filter System's** commitment to protecting the rights and privacy of personal data, and compliance with the **General Data Protection Regulations (GDPR)**, **Data Protection Act 2018**, the **Privacy and Electronic Communications Regulations (PECR)** and the **Payment Card Industry Data Security Standard (PCI DSS)**.

Fileder is a data controller registered with the **ICO (Information Commissioner's Office)**. The Company Secretary is the point of contact for all personal data queries or concerns. Personal data refers to any information that can identify an individual, and the legislation affects how the Company handles information collected from employees, clients, suppliers, temporary staff, contractors and prospective clients. Data processing involves any operation performed upon personal data, such as collection, recording, organisation, storage, retrieval, dissemination or otherwise making available and the destruction of.

Fileder carries out the following practices to ensure data security:

- Cross-shredding paper documents that contain financial/HR information.
- Removing personal data from systems (e.g., **SAP BP**) when inactive or no longer needed.
- Clearing network folders and emptying the Recycle Bin.
- Assessing the **security of third-party data processors**, especially those outside the EU.
- Securing personal data with **role-based access** and **non-disclosure agreements**.
- Mapping personal data according to a **GDPR** lawful basis.
- Practicing **data minimisation**, accuracy, security and transparency with data subjects and works in accordance with proper **retention periods** and **intended purposes**.
- Using links instead of attachments to **avoid duplicate data**.
- Avoiding storing personal data in folders such as Downloads or Recycle Bin.
- Setting annual reminders to review and delete unnecessary personal data.
- Using **BCC** for confidential recipients.
- Deleting emails with payment or bank details from Inbox and Deleted Items.
- Avoiding excessive details (e.g., personal reasons for absence).
- Not leaving personal information unattended or in unsecured locations.
- Employees may only share data with proper **authorisation**.
- Not storing or sharing **cardholder data** unnecessarily.
- Notify the Company Secretary for assistance with **Data Protection Impact Assessments (DPIAs)**.
- Group, shared, or generic accounts, passwords or other authentication methods are prohibited. Generic user IDs and accounts are disabled or removed.

Telephone Payment Card Information

- Using the pause function when recording calls to avoid saving card details.
- Verifying changes in bank details by phone.

Marketing and Communication

- Using **explicit opt-ins** for marketing communications and include opt-out options in email marketing.
- Cross-checking telephone leads with the **Telephone Preference Service (TPS)**.
- Sending marketing mail only to corporates or opted-in individuals, sole traders, partnerships, or residentials who have not previously bought from Filerder.
- Website forms, and **SAP** marketing preference tick boxes, support the monitoring of solicited (requested) marketing which is not affected by **PECR**.

Employee Information Retention

- Providing employment references up to six years post-employment with consent, including start/leaving dates and positions. Follow retention periods and dispose of personal data securely.
- **Sage Payroll** is backed up to a network folder and all network folders are synced to a second **NAS** box nightly for backup purposes. Two backup NAS boxes are also synced to **Synology Cloud Backup** on a nightly basis.
- Access for any terminated users is immediately deactivated or removed.

Technology and Data Security

- New technologies are subject to the **IT Department's approval**. Wherever personal data is held, whether electronically or physically, a documented security risk assessment of Filerder's personal data locations is available for audit purposes and should be added to if new methods of storing personal data are considered.
- Ensure data security aligns with Filerder's **Business Continuity** and **Data Recovery** policies.

Environmental Policy

Fileder Filter Systems Ltd supplies filtration equipment across industries, offering technical solutions for removing contaminants and recirculating water, promoting natural resource conservation and safe pollutant disposal. Products are approved by the Drinking Water Inspectorate (DWI) and Water Regulations Advisory Scheme (WRAS), and Fileder is a member of the Water Quality Association (WQA). All employees, including homeworkers, must follow this policy and will otherwise face disciplinary action.

Environmental Commitment

Fileder aims to minimise environmental impact by:

- Complying with all environmental legislation.
- Preventing pollution where possible.
- Reducing waste and promoting recycling.
- Incorporating energy efficiency into facilities and activities.
- Raising staff awareness of environmental impacts.
- Using ethical manufacturers with shared environmental values, where feasible.
- Continuously improving **ISO 14001 certification** and related objectives.

Waste and Energy Management

- Products do not fall under **REACH** or contain harmful biocides.
- A **COSHH** register ensures safer chemical alternatives are used.
- Compliance with **WEEE Directive and Packaging Waste obligations**.
- Waste is managed to be disposed of; licensed providers ensure zero landfill and provide annual **Waste Transfer Notes**.
- Stock is managed to reduce over-purchasing and waste.
- Bulk purchasing and delivery consolidation minimise transport emissions.
- High stock holdings reduce greenhouse gas emissions by enabling container shipments over air freight.
- Stock rotation prevents waste.
- LED light bulbs are replaced by fluorescent lights, controlled via sensors or timers.
- Monitors, air conditioning, and computers are centrally managed or set to standby.
- All company cars are electric, except the van, with a plan for full conversion.
- Spectrum brand packaging is 80% recyclable. Packaging is increasingly made from recyclable materials.
- Company phones are reused or recycled.
- Damaged/non-conforming stock is re-purposed to minimise waste.
- Pallets are reused for deliveries.
- Packaging waste (cardboard/plastics) is baled and recycled.
- Staff use office recycling bins as trained.
- Electrical equipment is stripped for reusable parts, with redundant devices recycled.
- Lightbulbs, toner cartridges, batteries, and tyres are recycled.

- Non-recyclable, non-hazardous waste is incinerated for energy recovery.
- All staff complete recycling and environmental awareness training.
- 33% of electricity is generated via solar panels.
- Transition to a 100% electric fleet by 2030, replacing remaining fossil fuel vehicles when viable alternatives emerge.

Equality, Diversity and Inclusion Policy

Fileder Filter Systems Ltd is committed to encouraging equality, diversity and inclusion in its workforce, and eliminating unlawful discrimination in relation to both employment and the service that Fileder provides. This policy ensures a respectful work environment that is free from direct and indirect discrimination.

Policy

- **No one is to receive less favourable treatment** on the grounds of physical or mental disability, age, gender, sexual orientation, parental status, marital status, race, religion, or national origin.
- **No one is to be disadvantaged** by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified, or victimised for taking action against direct or indirect discrimination or harassment.
- The Company is free of unwanted conduct that violates the **dignity of workers** or creates an intimidating, hostile, degrading, offensive or humiliating environment.
- Selection for employment, promotion, transfer and training, and access to benefits, facilities and services, will be **fair and equitable, based solely on merit**.

Procedure

- The Company Secretary will be responsible for the day-to-day operation of the policy.
- The policy will be communicated to all employees and job applicants and can be found on **Workplace**.
- **Training** on the policy, and on an employee's rights and responsibilities under the policy, will be provided where necessary and continually developed.
- Grievances regarding discrimination will be regarded seriously.
- Suspected discrimination is to be reported to management immediately.
- Policies, procedures, requirements, conditions, provision and practices will be reviewed regularly to ensure compliance.
- The Managing Director has overall responsibility for the effective operation of this policy, although it is the responsibility of all staff to uphold it.

Health and Safety Policy

Fileder Filter Systems Ltd is committed to ensuring that all the legal requirements of Health and Safety legislation, including the Health and Safety at Work Act 1974, are fulfilled and that any risks to employees and visitors, including temporary workers, customers and the public, are eliminated or controlled. Fileder has taken every precaution to minimise the occurrence of an accident in the workplace.

In the event of an accident, it is your responsibility to report the incident to a member of the First Aid Team and your line manager. The Health and Safety Law poster is displayed on Humand. Employees can access the Company's Employer's Liability Certificate on Humand and the Fileder Website (Employer's Liability Act 1969). Risk Assessments are accessible via Humand and Business Services.

Protocol

- To provide adequate control of the health and safety risks arising from work activities and consult with employees on matters affecting their health and safety, including training requirements.
- To eliminate hazards and reduce risks, where possible, with the aim of continual improvement.
- To comply with and keep up-to-date with all national and international health and safety legislation and standards.
- To provide and maintain appropriate personal protective equipment.
- To ensure safe handling and use of substances.
- To provide clear instructions, information, supervision and adequate training to ensure employees are competent to do their work.
- To maintain safe working conditions and equipment to prevent accidents, incidents, and cases of work-related ill health.
- To implement emergency procedures, including evacuation in case of fire or other significant incidents.
- To provide first aid arrangements, including trained first-aiders and maintained first-aid supplies.
- To review and revise this policy annually.

All employees have a legal duty to take care of the safety of themselves and others and to cooperate with the Company in complying with statutory requirements. The Company takes every precaution to eliminate hazards that might cause harm. All employees must familiarise themselves with the Company's Health and Safety Policy. It is the responsibility of all employees to perform their assigned duties safely by following established, safe working practices, the correct use of personal protective equipment and control measures and by reporting and, where it is within their job role to do so, correcting unsafe actions or conditions. Fileder takes every precaution to eliminate hazards that might possibly harm the employee, and it is the employee's personal responsibility to do nothing to harm themselves or any other member of the staff, contractor or visitor to site.

Quality Management Policy

Filerder Filter Systems Ltd takes a dedicated approach to ensure that it can efficiently and accurately interpret business partners' needs, and therefore, reliably tailor solutions to each application. The Quality Management Policy underpins Filerder's commitment to upholding the Company's standard of excellence.

Filerder is a specialist organisation focused on providing filtration solutions across industries by stockholding and supplying liquid and air filtration products from quality assured sources, without lot traceability. Filerder has been certified under **ISO 9001:2015** since 1992, demonstrating its commitment to quality management and exceeding partner expectations. The ISO 9001 standard serves as a framework for continuous improvement, helping the Company to align its quality management system (**QMS**) with its goals.

Celebrating 40 years of independence in 2021, Filerder has earned a reputation for being '**easy to deal with**'. The Company **maintains high standards of legal, quality, and health and safety compliance**, all while offering a flexible, professional service. This approach is supported by continuous **investment in training** for field, office, and technical personnel, along with utilising the **latest information technology**, enabling business partners' filtration processes to run smoothly.

Quality Assurance

- Filerder has established a **standard of quality** for its products and services, primarily to achieve a level of performance that will protect and enhance its reputation within the market sector. This enables the Company to satisfy the demands and requirements of its business partners to both national and international standards, whilst supporting the financial needs of the business.
- To ensure that those requirements are met, it is Filerder's policy to emphasise quality awareness and assurance in all aspects of company activities. The aim is to achieve the following quantifiable goals:
 - A profitable, sustainable and growing business (where market conditions allow), through the identification and satisfaction of business needs.
 - Financially justifiable **continuous improvement**, in both business partner satisfaction and in-house performance/improvement targets set by senior management.
 - Establishing an environment in which the commitment of all individuals to achieve the desired excellence is not only expected, but also encouraged and recognised.
 - Close liaisons with suppliers to ensure only materials and products, which fully conform to requirements, are available to business partners and encourage suppliers to join in committing to a **zero-defect environment**, both in terms of product and service quality.
 - Close liaisons with all business partners to ensure **business partner satisfaction** and company development.
 - To support this policy, and comply with **ISO 9001:2015**, documented and management information systems controlling the services and operations are integral to the company structure. This provides assurance to business partners that all activities, including procurement, inspection and testing, conform to specified standards, and that materials and services supplied conform to contract and regulatory requirements.

- Filerder recognises that all employees have an input to, and responsibility for, the quality and performance of its products. Therefore, selection, training and employee development hold a position of high importance within the Company, for all aspects of its activities.
- The documented quality policy, system and procedures are subject to senior management review of their effectiveness and are improved as required. Other working practices that strengthen the **quality assurance programme** and Filerder's business partners' perception of the Company shall also be reviewed, subject to financially justifiable and proportionate improvement as required.
- Customers receiving the correct products within the expected time frame has not dropped below 99.90% in the past 3 years.
- Filerder provides **product and channel training** to develop staff expertise.

Sustainable Procurement Policy

Filerder Filter Systems Ltd is committed to sustainable procurement practices, prioritising environmental responsibility, ethical sourcing, and commercial viability. This policy supports the Company's Environmental and Business Ethics policies and aims to reduce the environmental impact of Filerder's activities while engaging with manufacturing partners.

Key Principles

- **Product Selection:** Favouring recyclable, biodegradable, or recycled products, conforming to environmental standards, where commercially viable.
- **Local Sourcing:** When feasible, prioritising local suppliers to reduce carbon footprint.
- **Lifecycle Consideration:** Assessing the total cost, energy use, carbon emissions, and disposal methods of products.
- **Collaboration:** Working with partners, including the **Environmental Agency**, to improve sustainable practices.
- **Net Zero Commitment:** Filerder is committed to becoming **Net Zero by 2050**.

Filerder's Responsibilities

- Assessing the need for products or services.
- Reporting on packaging and waste compliance.
- Considering the environmental, social, and ethical credentials of manufacturing partners.
- Consolidating shipments to reduce carbon emissions and transportation mileage.
- Ensuring all suppliers comply with relevant environmental, social, and ethical standards.

Manufacturing Partner Expectations

Manufacturers must:

- Demonstrate credible environmental and corporate responsibility policies.
- Collaborate to reduce packaging and plastic usage.
- Comply with relevant legislation and **International Labour Organisation** conventions.

Continuous Improvement

- Manufacturing partner audits
- Staff sustainability training
- Energy efficiency
- Electric fleet expansion
- Freight reductions