

Ethical Marketing and Green Claims Policy





Purpose

At Axter, our core values of respect, integrity, service and collaboration are reflected in our actions every day. Our Ethical Marketing and Green Claims Policy reflects our commitment to these values and guides how we communicate with our stakeholders about our business, products, and services. to build long-term partnerships and trust with all our stakeholders.



Scope

This Policy governs how we communicate the benefits of our products and services. Ensuring accuracy, transparency, and honesty in the messaging of our copy, selection of imagery, and the logos or infographics we design and use. It also covers comparisons with other products or organisations, ensuring fairness and clarity. The Policy applies to Axter's employees, third parties, executives, suppliers, distributors, and agents. In the context of this Policy, third–party refers to any individual or organisation Axter works with, including but not limited to suppliers, contractors, distributors, agents, and customers.



Principles

Our Policy follows six fundamental principles for communicating with our stakeholders. It includes legal compliance, transparency, accountability, fairness and honesty, environmental impact, and diversity and inclusion.

1. Legal Compliance

We will always communicate in compliance with the law. We will respect our customers' confidentiality and protect them from any unwarranted infringements of privacy. We will ensure that no one is portrayed or referred to negatively or offensively. Furthermore, we will follow our <u>data and privacy policy</u> to ensure that all communication is GDPR compliant.

2. Transparency

Axter is dedicated to transparent communication regarding the benefits of our products and services. We will not conceal or omit information. The resources we use to support our claims, either around our sustainability or quality assurance, will be made available upon request or presented freely as evidence. We will ensure clarity in our communication while avoiding the use of ambiguous or vague statements and overstatements in advertising and public declarations.

3. Accountability

We are committed to providing accurate information that is always supported by evidence. Our claims will be cross-referenced and regularly evaluated for accuracy. We understand that we are not infallible, and if mistakes occur, we encourage our stakeholders to hold us accountable so that we can learn from them and avoid repeating similar mistakes in the future.

4. Fairness & Honesty

We are dedicated to using fair, concise, and simple language when comparing our products or services with other organisations or competitors. Additionally, we ensure that our sustainability efforts are communicated truthfully and that our actions align with our commitments as outlined in our Environmental Policy and Sustainability Strategy. Our goal is to deliver on our promises, and we will do so by remaining committed to integrity and transparency.

5. Environmental Impact

The meaning of all the environmental terms used in our messaging will be clear to our stakeholders, and we will not make unsubstantiated claims. When we make absolute claims, academic and scientific evidence will be used to substantiate them. Unless stated otherwise, we will base our environmental claims on the advertised product's Environmental Product declaration and clarify any limitations. We will commit to the stipulations outlined by the Green Claims Code released by the Competitive Market Authority UK.

6. Diversity & Inclusion

Our marketing should speak to and connect with our entire community. We strive to build inclusivity through our actions and it's important that our marketing reflects that. We will respect all cultures and avoid any offensive marketing communications. We to listen to and learn from our community and be self-reflective on our journey to continuously improve.



I. Use of Language

Terms like "eco–friendly", "green", "conscious", and "responsible" can be ambiguous and unclear when the word lacks context and specific criteria, making the statement potentially misleading. We prioritise using precise and well–defined terms that provide clear and measurable indicators of our social and environmental efforts. Additionally, some of the terms we use are defined further in our Green Dictionary (link to last page).

II. Verifying Our Claims

We use third-party validators to ensure our sustainability and quality claims are back by evidence, as outlined in our principles. These third party validators include B Corp, ISO14001, ISO9001 and Environmental Product Declarations. In addition to this, our quality assurance certificates, carbon footprint analysis report and sustainability strategy are publicly available on our website.

We use the research, resources and data these third parties provide to inform our communication of sustainability benefits or facts. For example, when communicating about our Solar PV Roofing system, we will specify what the benefits are as outlined in the technical guides accompanying the system. "Axter Solar PV uses high performance power output modules with efficiency ratings greater than 19% in accordance with The Department for Education roof mounted Solar PV output specification".

III. Use of Imagery & Colour

We observe clear principles regarding imagery and colours in our marketing to ensure authenticity and avoid deceptive or offensive depictions.

We use imagery showing genuine products and initiatives and avoid using misleading stock photos. We are responsible with our use of colour, using green tones that suggest sustainability only when the design is for a product, service or campaign that is backed by genuine positive environmental efforts.

When representing society, we ensure that all visual content is socially diverse and inclusive, respecting cultural differences, and ensuring that we avoid stereotypes that may be offensive.



IV. Editorial Processes

Our Marketing Manager will review every piece of content, followed by a final check with our Managing Director before publication and distribution.

V. Training & Education

During the onboarding process, new hires receive in-house training that acquaints them with Axter's business mission, Staff Handbook and polices, and commitment to sustainability. This provides an overview of Axter's practices and decision—making, including the Ethical Marketing and Green Claims policy. Additionally, each new employee will also complete a carbon literacy course within their first six months. At the start of employment, every employee is provided the Axter Staff Handbook and we ensure we provide annual updates to the team outlining any policy updates.

VI. Customer Engagement

We understand the importance of being transparent and honest with our customers about our environmental and quality assurance claims. Therefore, we actively engage and communicate with our clients and local communities on sustainability issues, our commitments, and initiatives. We will conduct frequent user research to ensure our claims are clear to our customers and we promise to respond to any inquiries regarding our claims within three business days.

VII. Partnerships and Collaborations

We promote sustainable and ethical marketing practices with our partners.

We provide guidance and share knowledge to enhance their understanding and implementation of responsible marketing practices. Transparency is essential, and we prioritise clear communication regarding our sustainability efforts.



VIII. Regular Reviews

Axter will review our content annually to ensure it aligns with industry best practices and that all references remain up to date. Additionally, we will review our marketing practices annually and seek feedback from our stakeholders on ways to enhance this policy and our practices.

IX. Governance & Reporting

Our Marketing Manager will oversee quarterly reviews to ensure compliance with this Ethical Marketing and Green Claims Policy. Instances of non-compliance are reported to the Managing Director, who will determine further actions.

Business area Managers are tasked with implementing practices, instructions, and operating models consistent with the Ethical Marketing and Green Claims Policy. The Marketing Team is responsible for reviewing and updating all marketing policy guidelines.



If you have any inquiries or concerns about Axter's communications around the quality of our products or services or our sustainability claims, or if you feel that we are not upholding the standards outlined in this Policy, please reach out to Jamie Watt at jwatt@axterltd.co.uk.

We value your feedback and are committed to continuously enhancing our communications.