

Ethical Labour Policy

Document control

Document title	Ethical Labour Policy
Document author(s)	Management
Policy owner	MD
Document owner	MD
Document status	Final
This version number	2
Review date	

Document amendment history

Version	Date	Amendment summary	Approval
1	4/6/2018	Final and complete	MD
2	29/6/2020	Updated to new layout and format of DK	MD

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1.0 SCOPE

- 1.1 This Policy applies to all the Company's own premises and in particular to all staff that have a managerial or supervisory responsibility for employees.
- 1.2 All business partners, including suppliers, service providers, subcontractors and labour providers are also required to adhere to the standards set out in this Policy.
- 1.3 The requirements in this Policy constitute minimum and not maximum standards and should not be used to prevent the exceeding of these standards. Where the provisions of law and this Policy address the same issues, we and our business partners must apply whichever provision affords the greater protection.

2.0 CODE

- 2.1 This code is based on the Ethical Trading Initiative (ETI) Base Code, the Fundamental Conventions of the International Labour Organisation (ILO), national and international laws, and the requirements of the Fast Forward labour standards improvement programme.

3.0 EMPLOYMENT IS FREELY CHOSEN

- 3.1 There is no forced, bonded or involuntary prison labour. Workers are not required to lodge monetary deposits or their identity papers with their employer and are free to leave their employment after reasonable notice.
- 3.2 Jobseekers must not be charged, either directly or indirectly, in whole or in part, any fees or costs at any point in the recruitment or employment process.

4.0 FREEDOM OF ASSOCIATION, THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED AND ACCESS TO REMEDY

- 4.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 4.2 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder the development of parallel means for independent and free association and bargaining.
- 4.3 Workers shall be provided with appropriate and effective access to remedy in accordance with natural justice and without fear of detriment.

5.0 WORKING CONDITIONS ARE SAFE AND HYGIENIC

- 5.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.
- 5.2 Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable the causes of hazards inherent in the working environments.
- 5.3 Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers. Workers shall be provided with access to clean toilet facilities and to portable water, and, if appropriate sanitary facilities for food storage shall be provided.

5.5 Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers. The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

6.0 CHILD LABOUR SHALL NOT BE USED

6.1 There shall be no recruitment of child labour.

6.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend quality education until no longer a child; “child” and “child labour” being defined in the appendices. Young persons under 18 shall not be employed at night or in hazardous conditions.

6.3 These policies and procedures relating to Child Labour shall conform to the provisions of the relevant International Labour Organisation (ILO) Standards.

7.0 WAGES

7.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal or industry benchmark standards, whichever is higher. In any event wages shall always be enough to meet basic needs and to provide some discretionary income.

7.2 All workers shall be provided with written and understandable information about their employment conditions including information with respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time they are paid.

7.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

8.0 WORKING HOURS ARE NOT EXCESSIVE

8.1 Working hours must comply with national laws, collective agreements, and the provisions defined in the clauses below, whichever affords the greater protection for workers.

8.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following:

- the extent, frequency and hours worked by individual workers and the workforce as a whole.
- It shall not be used to replace regular employment.
- Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay, except where a consolidated rate of pay has been negotiated with worker representation.

8.3 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by the clause below.

8.4 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;

- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

9.0 NO DISCRIMINATION IS PRACTISED

9.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

10.0 REGULAR EMPLOYEMENT IS PROVIDED

10.1 To every extent possible work performed must be on the basis of recognised employment relationships established through national law and practice.

10.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting and home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

11.0 NO HARSH OR INHUMANE TREATMENT IS ALLOWED

11.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidations shall be prohibited.

12.0 ENTITLEMENT TO WORK

12.1 Only workers with a legal right to work in the country should be employed. For all workers, original documents should be reviewed and then returned to workers to verify right to work.

13.0 SUPPLY CHAIN DUE DILIGENCE

13.1 Businesses shall demonstrate sound commercial procurement practices, prior to appointment, to establish that suppliers, subcontractors, service providers, labour providers and homeworkers operate in line with all required legal and ethical labour standards. In particular, for labour providers ensuring that:

13.2 Relationships with Labour providers are covered by a contract and Service Level Agreement which meets all national legal and ethical requirements.

13.3 Labour providers undergo an independent, third-party social compliance audit on a regular basis to ensure compliance with all legal and ethical requirements.

14.0 BUSINESS MANAGEMENT

14.1 Businesses will operate to well developed and integrated ethical labour standards policies and procedures as stipulated in this Ethical Labour Standards Policy. In particular:

- Ensuring an anti-bribery and corruption policy is in place, is constructed in accordance with globally accepted good practice and is applied and complied with in arrangements with potential and current suppliers, service providers and clients.
- Ensuring key decision-making managers act at all times in a fit and proper manner;

- Ensuring that the business has the competence, capability and management processes to enable it to comply with all applicable legislation and ethical standards related to the recruitment and employment of workers.

15.0 TAX

- 15.1 Businesses shall ensure that all employment and business taxes are accurately calculated and paid in accordance with national law.

16.0 ENVIRONMENT

- 16.1 At a minimum, companies must comply with the requirements of all local and international environmental laws and regulations including having necessary permits.

17.0 ACCOUNTABILITIES AND RESPONSIBILITIES

- 17.1 This Policy has been approved by Management and will be reviewed annually. The Company is responsible for creating this Policy and ensuring there are appropriate systems in place to manage compliance with the Policy and all relevant legislation, and maintaining records to monitor and demonstrate compliance.

18.0 IMPLEMENTATION AND MONITORING

- 18.1 Internal: the Company will implement supporting management systems to ensure this Policy is embedded throughout the business. We will undertake regular, internal audits and set necessary targets and objectives to monitor and measure our own progress on ethical compliance. We will undergo regular independent audits, commissioned by our customers, to monitor our own compliance with this Policy.
- 18.2 Labour providers: We expect labour providers to undergo an annual, independent third party social audit or equivalent external scrutiny through an independent, labour provider social compliance certification scheme.
- 18.3 Suppliers, service providers and sub-contractors: We expect all suppliers, service providers, sub-contractors and any other business partners to agree as part of their contract to adhere to the standards set out in this Ethical Labour Standards Policy and to all relevant legislation and international labour standards. Where necessary, we may request further evidence of compliance to these standards for example through an independent, third party social compliance audit.

DEFINITIONS

Child - Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.

Homeworker - Our definition of homework is based upon the ILO definition (1996, C177, Article 1) which states:

- a) the term home work means work carried out by a person, to be referred to as a homeworker,
 - i) in his or her home or in other premises of his or her choice, other than the workplace of the employer;
 - ii) for remuneration;
 - iii) which results in a product or service as specified by the employer, irrespective of who provides the equipment, materials or other inputs used, unless this person has the degree of autonomy and of economic independence necessary to be considered an independent worker under national laws, regulations or court decisions;
- b) persons with employee status do not become homeworkers within the meaning of this Convention simply by occasionally performing their work as employees at home, rather than at their usual workplaces;
- c) the term employer means a person, natural or legal, who, either directly or through an intermediary, whether or not intermediaries are provided for in national legislation, gives out home work in pursuance of his or her business activity.

Labour provider - A term interchangeable with "labour recruiter" as expressed in the Forced Labour (Supplementary Measures) Recommendation, No 203, which refers to both private and public entities that offer

labour recruitment services. Private entities may be formal (e.g. registered under commercial or other law) or informal (not registered, such as informal sub-agents), profit-seeking (e.g. fee-charging agencies) or non-profit.

Labour providers operating as private entities are defined by ILO Convention No. 181 Article. 1.1 as private employment agencies as "a natural or legal person, independent of the public authorities, which provides one or more of the following labour market services:

- (a) services for matching offers of and applications for employment, without the private employment agency becoming a party to the employment relationships that may arise therefrom;
- (b) services consisting of employing workers with a view to making them available to a third party, who may be a natural or legal person (referred to below as a "user enterprise") that assigns their tasks and supervises the execution of these tasks;
- (c) other services relating to job-seeking, determined by the competent authority after consulting the most representative employers and workers organizations, such as the provision of information, that do not set out to match specific offers of and applications for employment."

A labour provider may be referred to by various terms including but not limited to labour broker, labour recruiter, gangmaster, employment business, private employment agency, recruitment agency or agency.

Young worker - Any worker over the age of a child as defined above and under the age of 18.