

THE ARISTOCRATE GROUP

Ethical Trading / Code of Conduct Policy – September 2019 V2

The Aristocrate Group is committed to trading relationships which are both commercially and ethically viable. We will support fair trade and only operate with suppliers, manufacturers who comply with our ethical trading policy. We will appraise suppliers to ensure our standards are met.

Primarily all our suppliers shall comply with all local laws applicable to their business. Our suppliers are expected to adhere to the principles of the United Nations Global Compact, UN Declaration of Human Rights, UN Conventions on the Rights of a Child as well as the 1998 International Labour Organisation's "Declaration on Fundamental Principles and Rights at Work" in accordance with national law and practice.

This policy sets out the minimum labour standards that we expect our suppliers to comply with: If this Code of Conduct is breached we will work with them to improve and remediate any issues whether this is business standards or employee welfare. We take any breach to our code of conduct very seriously, we are within our rights to terminate our arrangement immediately for any appropriate failures to adhere to the policy or where there is no willingness to make the necessary changes.

Our Ethical Trading / Code of Conduct is a compulsory requirement and in addition to 3rd party audits we will also verify that this is being adhered to by conducting our own internal audits periodically.

Severe Risks

- 1) There is no forced or bonded labour.
- 2) Child labour is not used.
- 3) No forms of discrimination is accepted.
- 4) Working hours comply with local law.
- 5) Wages meet the minimum local law.
- 6) Human and civil rights are respected.
- 7) Bribery either to customers or from suppliers is not acceptable.
- 8) Non transparency of factory conditions and records.
- 9) Denied access.
- 10) Un-authorized subcontracting.
- 11) Unauthorised disposal and Illegal dumping of chemicals, waste water and sludge.

1. Forced, bonded or involuntary labour

- 1.1. Any work or service that is extracted from any person under the threat of a penalty or where they have not entered voluntarily into an employment contract. Examples include slave or indentured labour, bonded labour, involuntary labour, involuntary or unpaid prison labour. Workers should not be required to lodge "deposit" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Child labour

- 2.1. There shall be strictly no recruitment of Child Labour.
- 2.2. A child is defined as any person less than 15 years of age unless local minimum wage law stipulates a higher age for work or mandatory schooling, in which case the higher age applies. If local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention 138, the lower will apply.
- 2.3. Young person is classed as below 18 but no less than 15.
- 2.4. No person under the age of 18 shall be employed at night, or in hazardous conditions.

3. Discrimination

- 3.1. There is no discrimination in treatment of a worker/prospective worker less favourably than any other worker/prospective worker in relation to hiring, compensation, access to training, promotion, termination or retirement on the grounds of their;
 - a) Age
 - b) Gender reassignment
 - c) Being married or in a civil partnership
 - d) Being pregnant or on maternity leave
 - e) Disability
 - f) Race including colour, nationality, ethnic or national origin
 - g) Religion or belief
 - h) Sex
 - i) Sexual orientation

4. Working Hours

- 4.1. Working hours must comply with the national laws and benchmark industry standards, whichever affords greater protection. Workers should not be required to work more than in accordance with national laws.
- 4.2. Standard working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week.
- 4.3. All overtime hours 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 hours shall always be compensated at a premium rate. Workers shall be provided with at least 1 day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

5. Remuneration

- 5.1. Workers should be paid at least the national minimum wage for a basic working week and this should be sufficient to cover basic needs and allow some discretionary income.
- 5.2. All workers should be provided with written and understandable information about their pay before they start employment and should be given a pay slip or other understandable information about their wages for the pay period concerned each time that they are paid.
- 5.3. All remunerations should be paid in timely manner, without undue delay.
- 5.4. Deductions from wages as a disciplinary measure shall not be permitted or shall any deductions from wages not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures should be recorded.

6. **Human and Civil Rights**

- 6.1. The right of everyone to form trade unions and join the trade union of his/her choice, subject only to the rules of the organization concerned. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 6.2. Unacceptable disciplinary practices such as those based on corporal punishment, physical or mental coercion, verbal abuse or deducting money from wages due to a worker will not be tolerated in any form.
- 6.3. Workers will be free from abuse, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are not allowed.
- 6.4. Fair wages and equal remuneration for work of equal value without distinction of any kind, in particular women being guaranteed conditions of work not inferior to those enjoyed by men, with equal pay for equal work;
- 6.5. Safe and healthy working conditions;
Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 6.6. Access to clean toilet facilities and to potable water, and if appropriate, sanitary facilities for food storage shall be provided.
- 6.7. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 6.8. Equal opportunity for everyone to be promoted in his employment to an appropriate higher level, subject to no considerations other than those of seniority and competence;
- 6.9. Rest, leisure and reasonable limitation of working hours and periodic holidays with pay, as well as remuneration for public holidays

7. **Bribery**

- 7.1 Bribery, the practice of offering something (money, gifts, hospitality or services) in return for or in expectation of more favourable treatment. Suppliers must conduct their businesses in an ethical manner and must not seek to gain competitive advantage by means of unethical or dishonest practices including without limitation; bribery, corruption, kickbacks, the provision of gifts, favours or services.

8. **Non-Transparency of Factory Conditions / Records**

- 8.1 We expect our suppliers to have an open door policy and fully be transparent in all monitoring activities, whether this be 3rd party audits, customer audits or internal audits. We expect full cooperation at all times, and failure to be transparent in terms of factory conditions and records will be taken very seriously.

9. **Denied Access**

- 9.1 We Aristocrate pride ourselves on having an open door policy, therefore should we or our customers wish to visit at any time whether this be for an audit or a spot check, access should always be granted. Denied access will be deemed as a breach of our policy and will be taken very seriously.

10. **Unauthorised Subcontracting**

- 10.1 Unauthorised subcontracting of any production processes without our written agreement is strictly prohibited; any instances or findings of this will be considered a breach of our code of conduct and will have serious consequences for the factory including permanent exclusion.

11. Unauthorised Disposal and Illegal Dumping of Chemicals, Waste Water and Sludge

11.1 The unauthorised disposal and illegal dumping of chemicals, Waste Water and Sludge is strictly prohibited. If there is any evidence that this has not been adhered to it will have serious consequences including penalties / fines and in the worst case immediate termination of our agreement.

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