

The Polyco Healthline Ltd Labour Standards and Ethical Trade Policy forms part of our overall social compliance strategy.

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| 1 | Purpose | 1 |
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- 1.1 The purpose of this policy is to set out Policy Healthline’s approach and commitment to labour standards and ethical trade as part of our overall social compliance strategy.

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| 2 | Scope | 1 |
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- 2.1 The scope of this policy covers all personnel within Polyco Healthline’s control and influence, including employees, home-workers and suppliers.

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| 3 | Definitions | 1 - 2 |
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For the purpose of this policy, the following definitions apply:

- 3.1 **Child**  
Any person under the age of 15, unless the minimum age for work or mandatory schooling is higher by local law.
- 3.2 **Forced or compulsory labour**  
All work or service that a person has not offered to do voluntarily and is made to do under the threat of punishment or retaliation or that is demanded as a means of repayment of debt.
- 3.3 **Human trafficking**  
The recruitment, transfer, harbouring or receipt of persons, by means of the use of threat, force, deception or other forms of coercion, for the purpose of exploitation.

### 3.4 Living Wage

The remuneration received for a standard working week by a worker in a particular place sufficient to afford a decent standard of living for the worker and their families. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs including provision for unexpected events.

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| 4 | Policy | 2 - 3 |
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At Polyco Healthline Ltd we are committed to working towards integration of labour standards, ethical trade principles, social responsibility and good stewardship throughout our supply chain. These are key business practices that enable us to work with our suppliers and contractors to ensure that working conditions and labour practices employed in the manufacture of our products are socially acceptable, taking into account local laws and regulations.

Polyco Healthline Ltd has implemented the following ethical code of conduct.

1. All employment is freely chosen. There is no forced, bonded or servitude labour. Modern slavery is a criminal offence (Modern Slavery Act 2015); it is exploitive and deprives basic human liberty and freedom.
2. All staff are entitled to belong to trade unions and collective bargaining is respected, to the extent permitted by local law.
3. Human rights (Human Rights Act 1998) are respected, and workers are provided the means to report grievances to management.
4. Working conditions are safe, healthy and hygienic.
5. Child labour is not used.
6. Wages are fair and comparable to other company's and wherever possible exceed the minimum wage.
7. Equal pay for equal work is established on the basis that employees that perform the same role using the same skill, effort and responsibility are given the same pay level.
8. Deductions from wages as a disciplinary measure shall not be permitted.
9. Working hours are not excessive and will not exceed any employment legislation.
10. No discrimination is practised.
11. Regular employment is provided for those who are employed on a permanent contract.
12. No harsh, cruel or degrading treatment or practices are allowed.
13. No bribery, corruption, blackmailing or bullying is permitted.
14. Good environmental stewardship is practiced.
15. Suppliers and buyers are both free to sell and buy from any number of other businesses. No trading restrictions as a way of guaranteeing business are allowed

Our Ethical Code of Practice is based on the International Labour Organisation (ILO) code of practice and Ethical Trade Initiative (ETI) base code and follows the SMETA (Sedex Members Ethical Trade Audit) audit and best practice guidance.

We actively support suppliers to integrate and acknowledge this code of practice within their own supply chain helping to guide improvement for the wellbeing of all employees.

Our social compliance process is managed through Internal Associate’s BRAND Integrity Management programme.

Social compliance audits are based on the International Labour Organisation (ILO) code of practice and follow the ILO Indicators of Forced Labour; these include:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

Additional information can be found in the Ethical and Social Responsibility statement PH-TLD-039.

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| 5 | Responsibility | 3 - 4 |
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## 5.1 Board

The Board and non-executive directors provide support and strategic direction for the company’s social compliance strategy.

## 5.2 Departmental Managers

Departmental managers are responsible for ensuring:

- Staff understand the process and policies in each of their departments.
- That any social compliance training (including induction and policy training) is recorded on the company Papaya platform.
- Educating and working with staff, suppliers and contractors to ensure their wellbeing, safety and social compliance.

## 5.3 Technical Department

The technical department is responsible for:

- Collation of social compliance data from suppliers and uploading to the BRAND Integrity Management software platform.
- Data analysis and reporting of the social compliance performance.
- Arranging third party audits where required.
- Tracking and follow up of social compliance corrective actions

**5.3 Employees**

Employees are required to comply with the company’s policies and procedures as set out in their employment contract, handbook, and training plans.

Reporting of social compliance incidents and concerns is the responsibility of every member of staff.

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| 6 | Raising Concerns | 4 |
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6.1 Polyco Healthline will provide clear routes by which concerns can be raised by employees. These include:

Internal Routes of Communication:

- Immediate Manager
- Company HR - [people@polycohealthline.com](mailto:people@polycohealthline.com)
- Company Director
- Through the HR secure drop box located on the internal rear wall of DC5 warehouse.
- IT helpdesk for data breach / privacy policy issues - [helpdesk@polycohealthline.com](mailto:helpdesk@polycohealthline.com) or by calling extension 2004

External Route of Communication:

- Protect for public interest disclosure (whistleblowing):
  - » Protect Website: <https://protect-advice.org.uk/>
  - » Protect Telephone: 020 3117 2520
  - » Protect E-mail: <https://protect-advice.org.uk/contact-protect-advice-line/>

6.2 Employees are an important element in the company’s stance on social compliance. They are positively encouraged and expected to raise any concerns that they may have on these issues where they are associated with the company’s activity.

6.3 Employees should normally raise concerns through their immediate manager; however, it is recognised that they may feel inhibited in certain circumstances. In this case, employees should approach HR or one of the directors directly.

6.4 Interested parties can raise concerns through our ‘contact us’ page, on the website (<https://www.polycohealthline.com/contact-us/>)

**Signature:** 

**Place of Issue:** Bourne, PE10 0DN, UK

**Name:** Andy Blewett

**Date:** 30<sup>th</sup> January 2023

**Position:** Executive Director