



Labour Standards Policy

1. Introduction

Uniplex (UK) Ltd recognises our obligation to provide our customers with high quality, professional goods and services at a competitive price whilst ensuring that at no point is any person in any part of the supply chain exploited or treated in a way that breaks relevant employment legislation. We are fully aware of the responsibilities we bear to all parties involved in each of the stages involved in producing our products and have such developed this policy to outline the standards that we should seek to adhere to. Uniplex (UK) Ltd places a high priority on risk identification and management throughout our operations and has processes in place to assure the integrity of our Risk Management framework. This Framework is based on integrated policies, procedures, systems and controls and regular reporting that seeks to identify, assess, mitigate, and prevent risks involved in and/or arising from the conduct of Uniplex operations and business relationships.

2. Aims

The aim of this policy is to promote understanding and awareness of employment laws and ethical standards. By detailing our labour standards to all parts of our supply chain we hope to develop better ethical standards by motivating our suppliers to adhere to it. It also describes the standard required of potential future suppliers.

3. Policy Statement

Uniplex (UK) Ltd.'s policy in relation to labour standards is relevant to the company itself, its contractors, sub-contractors, suppliers and any other parties engaged through the supply chain is as follows:

- We shall comply to all Employment Laws relevant to our business
- We comply to the Health and Safety Act 1974 - as outlined by our Health and Safety Policy
- We comply with all other Employment legislation, as outlined in our Employee Handbook
- Our compliance with the above is kept up to date using an external HR company
- We comply to the Equality Act 2010
- We shall encourage all suppliers and contractors to adhere to Labour Standards as part of their respective contracts reiterating their commitment to understanding modern slavery risks and ensuring that there is no modern slavery in their supply chains.

4. Roles and Responsibilities

The Managing Director shall undertake the main responsibility of the LSAS and liaise with the Quality Administrator and departmental Mangers to develop the LSAS, implement training for staff involved with the LSAS and present any developments at regular intervals and during the annual Management review.

5. Management Representative

The Quality Administrator has the responsibility of implementing an effective Labour Standards Assurance System (LSAS). The responsibilities of the Management Representative are as follows:

- To develop procedures to meet policy requirements
- To communicate labour standards issues to the Managing Director
- To liaise with suppliers to undertake labour standard status reviews
- To regularly review and improve the Labour Standards policy

6. Minimum Labour Standards

Our defined set of minimum labour standards are:

- **Child Labour** - Uniplex does not tolerate the use of child labour and prohibits the use of child labour in its supply chain.
- **Forced & Compulsory Labour** - Uniplex has a zero-recruitment fee policy, meaning we do not require any of our employees (including foreign workers) to pay any recruitment fees or other related fees for their employment. Uniplex does not tolerate and will not engage in or support the use of forced or compulsory labour or bonded or involuntary prison labour and prohibits the use of the same in its supply chain. Uniplex does not require that employees surrender any government-issued identification, such as a passport, as a condition of employment.
- **Health & Safety** - Uniplex provides a safe and healthy workplace environment and takes effective steps to prevent potential accidents and injury to employees' health by minimising, so far as is reasonably practicable, and in co-operation with its employees, the causes of hazards inherent in the workplace. All employees receive health and safety instructions during their employment with the company. Employees have access to safe, clean sanitary facilities and drinking water.
- **Discrimination** - Uniplex does not engage in or support discriminatory practices in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, race, religion, gender, sexual orientation, political affiliations, age or other conditions that could give rise to discrimination, unless required by law. Uniplex has an Equality and Diversity Policy which is provided to all employees.
- **Disciplinary & Grievance Practices** - Uniplex is committed to treating all employees with dignity and respect. We do not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of employees.
- **Working Hours** - Uniplex complies with applicable national laws and regulations on working hours (including overtime and rest periods) and holiday entitlements as a minimum standard. Uniplex does not tolerate forced labour and will not compel any employee to work against their will, either by intimidation or threat, or by physical confinement, human trafficking, slavery, or any other means.
- **Remuneration** - Uniplex complies with applicable national laws and regulations regarding wages and benefits and seeks to ensure a fair wage for fair hours of work for all its employees.

7. Labour Standards Status Review

Uniplex (UK) Ltd shall commit to undertaking a comprehensive Labour Standards Status Review when contracting a new supplier, to ensure that labour standards throughout our supply chain are satisfactory and continually improving. We recognize that if any contractor or sub-contractor is found to be using unethical or illegal labour programs, this would have a profound impact on the reputation and integrity of the company. The timescale of the Labour Standards Status Review is subject to change, given the findings from previous reviews, as deemed appropriate by management during the Management Review.

8. Legal Requirements

Uniplex (UK) Ltd commit to remain up to date with changes to relevant employment legislation by an external HR Company. Relevant employment legislation with regards to the company's direct operations is outlined in the Employee Handbook and is signed by all employees once read and understood.

9. Objectives, Targets and Programmes

Uniplex commits to developing objectives and targets through Labour Standard Reviews, our Corrective Action process, Preventive Action process and suggestions for improvement. These will be reviewed by Quality Administrator and Managing Director during the monthly Quality Reports and the annual Management Review, to determine whether the company is on target to reach their objectives and to ensure these objectives are still appropriate. This will ensure that all relevant personnel will be kept up to date with the development of the LSAS programme.

10. Competence, Training and Awareness

Uniplex shall commit to the training of relevant staff to be competent with handling the labour standards programme. Relevant staff is those involved in purchasing and new product development. Persons involved with the LSAS should:

- Have a good understanding of how the company operates with knowledge of the supply chain
- Be able to contact suppliers and build a relationship with them
- Be trained in the LSAS requirements.
- We will ensure that all our key contractors, sub-contractors and suppliers are aware of our LSAS policy

11. Communication

Our LSAS Policy will be:

- Communicated to all employees by clearly displaying the policy throughout the business and supplying each employee with a copy of the policy, who will sign to say that they have read, understood and are aware of our commitment to LSAS.
- Included in our induction process for all new employees
- Will be made publicly available by displaying it on our website for all suppliers and customers to view.
- A copy of our LSAS policy will be sent to all contractors, sub-contractors, and suppliers.

12. Documentation and Records

Documentation and records in relation to the LSAS shall be kept using our Document Control procedures in line with our ISO Quality Management Systems.

13. Operational Control

Our Employee Handbook documents the procedures involved with controlling labour standards of our company and the actions taken should a breach in these standards occur. Uniplex has identified two critical control points for labour standards in the supply chain, Supplier Approval (Appointing a new supplier, Supplier Performance Review) and identifying Non-conformance and taking appropriate corrective actions. Results from LSAS Supplier Questionnaires are recorded and maintained in the Approved Supplier List.

14. Supply Chain Management

Uniplex (UK) Ltd will commit to monitoring and maintaining the labour standards in the company's supply chain through the distribution and communication of the company's labour standards policy along with ongoing assessments of whether these standards are being met. These standards are to comply fully with those required by the LSAS. Reviews shall be taken at routine intervals to ensure they continue to comply fully with the LSAS. The findings of supplier evaluation are recorded on our Approved Supplier List in line with our Purchasing procedure within our Quality Management System. Those parties that are involved in the supply chain are included on our Approved Suppliers List. Information has been collected relating to our supplier's labour standards performance utilising our Supplier Questionnaire Form. Any issues identified will be recorded through our corrective action

process and assessed to determine a suppliers' continued suitability. If necessary, any issues would be highlighted by the Quality Administrator at the management review meetings with a decision reached on further action.

15. Emergency Response

Uniplex identify and document any significant labour standards issues and risks. These are recorded on our Approved Supplier List in line with our Purchasing procedure within our Quality Management System. Information has been collected relating to our supplier's labour standards performance utilising our Supplier Questionnaire Form. Any issues identified are recorded and documented through our corrective action process and assessed to determine a suppliers' continued suitability. Any significant issues are highlighted to the Managing Director, who will ascertain whether the breach is major or minor and raise a non-conformance and discuss corrective actions with the supplier. If the supplier does not implement corrective action in a timely manner, the Managing Director will make a decision on whether further action is required and decide whether the supplier/contractor should be delisted from our Approved List of Suppliers and an alternative supplier to be sourced. No further orders will be placed with an existing supplier who is at risk of being delisted. The action taken will be appropriate to the issue and also the current risks.

Typical significant risks and issues can include:

- Migrant workers discriminated against
- Dormitories - sub-standard lodgings provided to workers with poor safety and hygiene
- Failure of minimum wage payment - being paid a lower wage than nationals
- Employees working long hours
- Unpaid internships, potential for forced labour
- Controlled trade unions, little freedom of collective bargaining
- Corruption, employees paid to "turn a blind eye" to unsafe practices
- Deterioration in the environment, pollution
- Breach in labour laws and standards

16. Performance Monitoring and Measurement

Uniplex (UK) Ltd will commit to monitoring the performance of the LSAS, assessing the progress of the programme against the latest version where appropriate and setting relevant targets, in addition to those stipulated in this policy, to ensure the progression of the LSAS against our objectives. Supplier status shall be measured through our supplier evaluation as per our Purchasing procedures and our Corrective Action procedures of any identified non-conformities.

17. Corrective Action

We will use our Corrective Action process as per Quality Management System to record and monitor any adverse allegations, complaints, a breach in labour Standards or alerts relating to the LSAS. During the verification of supplier performance, if any non-conformances are identified, the corrective action process should be followed

18. Management Review

Uniplex (UK) Ltd is committed to continually improving its Labour Standards Assurance Management System in line with this policy, and to meeting relevant targets to drive improved performance. The policy will be reviewed on an annual basis to ensure its continuing focus, relevance, and alignment to the legal requirements in the jurisdictions where we operate during the Management review meetings.

Authorised By: Adriaan Posthuma
Title: Managing Director

Signed:



Date: 07.12.2020

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